

**T H E   K I N G S   C R O S S**  
**RAILWAY LANDS GROUP**  
working for a community development

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)

8<sup>th</sup> October 2004

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

KXRLG, 5 Caledonian Road, London, N1 9DX  
tel: 020 7837 6824    email: [office@kxrlg.org.uk](mailto:office@kxrlg.org.uk)  
fax: 020 7278 0444    [www.kxrlg.org.uk](http://www.kxrlg.org.uk)

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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.

## **SECTION A: 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 718,275m<sup>2</sup>) 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.

### **11.4. 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.

### **12.5. 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.

### **43.6. 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.

#### **14.7. 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.

#### **15.8. 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.

#### **16.9. 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.

The following text presents a detailed analysis of these and other aspects of the development proposals with occasional reference to the adopted Planning and Development Brief, Chapter 13 of the Camden UDP, the London Plan and current and emerging London and Central Government policy and guidance notes. In the process, it endeavors to set out how the King's Cross Railway Lands Group would like to see the application revised to meet the views of its' members.

## **SECTION B. SUMMARY OF APPLICATIONS**

Summary of "above the line" outline applications:

- a. Outline applications to develop:
  - The Main Site (26.1 ha – 64.5 acres) not including the "Linear lands" between CTRL and the North London Line
  - Islington Triangle (1.1 ha – 2.7 acres)
- b. Listed Building Consent applications to demolish:
  - Gasholder No 8 and re-erect opposite Camley Street Park
  - Stanley Buildings North
  - Small additions, railings etc to Great Northern Hotel. (Hotel kept)
  - One bay at northern end of east and west Handyside Canopies
- c. Conservation Area Consent applications to demolish/other works to
  - Western Goods Shed
  - Plimsoll Viaduct
  - Culross Buildings
  - Many other buildings/structures within the two Conservation Areas e.g. Regents Canal walls, Petrol filling station.

b. and c. above are accompanied by a Heritage Baseline Study and Illustrative Highway Proposals.

### **B. 1 DEVELOPMENT OF MAIN SITE**

Outline approval sought for siting, access, landscaping as described in:

- Planning application form and covering letter
- Development Specification
- Parameter Plans (KXC 001 – 016)
- Landscaping Proposals Plans (broad disposition and layout only)
- Specifications of works to retained historic buildings and structures

Approval is not sought for Design or External appearance.

#### **B.1.1 Proposed Land Use (Table 1 Development Specification)**

KING'S CROSS RAILWAY LANDS GROUP

response to the King's Cross Central planning applications by Argent St George

MAXIMUM FLOORSPACE WITHIN THE TOTAL THAT MAY BE DEVELOPED (m2)									
TOTAL APPLIED FOR M2	OFFICE / EMP BI	RESID	HOTEL Etc C1	SHOPS CAFES A1,2,3	CMTY USES D1	LEISURE RECR D2	CINEMA	M/St CAR PARK	OTHER
South of canal 238,545 M2	219,010	3,900	32,625	15,460	3,180	975	0	0	525
North of canal 479,730 M2	267,270	172,925	14,600	30,465	72,585	30,575	8,475	23,850	525
GRAND TOTAL 718,275 M2	486,280	176,875	47,225	45,925	75,765	31,550	8,475	23,850	525

- Further Zone detail in Annex B Development Specification
- The only certain figures in the application are the Grand Total and its subdivision north/south of the canal. The maximum (“up to”) figures will not be exceeded either, but in total they amount to 896,470 m2 so if one is built to the maximum – eg. 486,280m2 of Offices (B1), then only (718,275m2 – 486,280m2 ) 231,995 m2 would remain for all other land uses.
- This flexibility reflects uncertainty surrounding construction of the LUL Northern Ticket Hall/King’s Cross Station Western Concourse and many other risk factors. “Unless economic conditions are favourable throughout the lifetime of the development, it is likely to take longer than the 12 – 15 years” from start in 2007.
- A further 32,000m2 basement south of the canal and 51,500m2 basement north of the canal is also applied for in the Development Specification (i.e. total of 801,775 m2).
- The maximum residential floorspace applied for could provide approx 2300 units (flats). A committed minimum of 125,000m2 would provide 1600 units: 40% of studio/ 1 bed; 37% of 2 bed ; 18% of 3 bed and 5% of 4 bed. Any additional units over 1600 would comprise 45% of studio/ 1 bed; 40% o f2 bed and 15% of 3/4 bed. Thresholds for delivery of these, including a significant proportion of affordable/low cost housing, would be agreed with the Planning Authorities.
- Some 40,000 m2 of D1 relates to current discussions with London Institute for relocation of Central St Martins into Granary Complex by 2009. Other Community, Health, Education uses that could be provided, if necessary and appropriate, include: Library, Primary Care and support facilities, Primary School, Art Galleries, enhanced facilities for boat users.

### **B.1.2. Development Zones**

Table 1 indicates almost entirely Office development south of the Canal with little or no housing at all. The main development zones are (A) and (B) (with basement services, storage, access etc below).

North of the Canal, the developers broadly envisage: -

- residential and play in the re-erected gasholders (N)
- leisure/cultural/educational activities (L and K).
- hotel or serviced apartments plus offices (P)
- central band of office development (Zones P, R, S ) from Copenhagen Street either side of new road west to, and including all of, Zone T.
- Multi-storey car park at southern end of T adjoining the canal
- Residential in far north of the Main Site (opposite Islington Triangle) and along the York Way frontage, with shopping etc (S, R, J, Q)
- Basement area under major Development Zones N, L, P, R, S, T

Boundaries of the major Development Zones can vary + or – 1-5m .

### **B.1.3. Density and Urban Form (Urban Design Statement)**

New building would be extremely dense. For reference, the top of St Pancras clocktower spire is 74.7m above Ordnance Datum (AOD). The height of the approx 12 storey wall of offices along the southern edge of Goodway would be 70 - 72m. (Zones A and B).

North of the Canal, land rises towards the Islington Triangle. Infill of the Shed behind the Granary would create a new building 2m higher than the Granary itself. At 65m, the re-erected Siamese Triplets (Zone N) would be 17m higher than the Granary. Zones P, R, S and T are particularly dense, rising from approx 15 storeys and max building height in Zone P of 72.5m, to max building heights in Zones R and S of 78.5m AOD and 84.0m AOD respectively, with approx 19 and 17 storey residential towers opposite the Islington Triangle. Zone T has a landmark office building 76m high terminating the westward extension (called Goods Street) of Copenhagen Street into the site. Generally Zone T will be twice as high as the adjoining CTRL embankment.

Parameter Plan KXC 012 indicates a range of limits of deviation for finished site levels across the development area

### **B.1.4. Public Realm and Movement**

The Public Realm is effectively all the land between and beyond the Development Zones. Several new public spaces are proposed - e.g. Station Square and Boulevard south of the Canal, and Granary Square and the Long Park (0.4 ha) north of the Canal. It also contains a considerable new primary, secondary and tertiary vehicular

network in addition to the realigned Goodsway, Pancras Road and York Way. "With no HGV parking, the site could readily accommodate 1800 car parking spaces."

## B.2 DEVELOPMENT OF ISLINGTON TRIANGLE

Outline approval for siting and access as described in:

- Planning application form and covering letter
- Development Specification
- Parameter Plans

Approval is not sought for landscaping, design or external appearance.

### B.2.1. Proposed Land Use and Layout

<u>TOTAL FLOORSPACE APPLIED FOR</u>	<u>SHOPPING, FOOD AND DRINK, A1 A2 A3</u>	<u>RESIDENTIAL</u>	<u>MEDI CENTRE, CRECHE FITNESS CLUB, D1 D2</u>
<u>24,000 m2</u>	2,500 m2	18,000 m2	3,500 m2

- 2,500 m2 shopping etc is part of the 45,925m2 max figure contained in the Main Site application. No shop unit more than 2000m2.
- Residential – max 250 flats (123 of 1 bed; 112 of 2 bed and 15 of 3 bed) in two Blocks A (max 19 storeys – approx 158 units of market housing) ; and B (average 8 storeys – approx 92 units of affordable key worker housing - 35% of total).
- Block C: Health and Fitness Centre could provide either a Swimming Pool or Sports Hall. Medi-Centre could provide surgery plus Community room/space.
- Possible Management Centre in either Blocks B or C.

Access is via a cul-de-sac off York Way over the Thameslink tunnel, with connection down to lower ground floor level containing 185 car parking spaces (125 residential, 60 for the Health and Fitness facilities, plus lifts up). At Ground floor level, the three Blocks A enclose an inner triangular court of private (keyholder) amenity space which would provide gardens, play area, etc.

## B.3 IMPLEMENTATION

The applicants are not committed to any particular Development Programme.

They are committed however to:

- Station Square (between Great Northern Hotel and German Gym) being finished no later than completion of Zone B
- Boulevard being finished no later than completion of Zone A
- Market Square and Long Park substantially finished when over 1000 housing units are completed.
- Each major development phase would contain a mix of uses including market and affordable/low cost housing.

“Unless economic conditions are favourable throughout the lifetime of the development, it is likely to take longer than the 12 – 15 year development programme” referred to in the application.

### **B.3.1 Notional First Major Phase (Implementation Strategy)**

- Enabling works e.g. realignment of Pancras Road, demolition of Culross Buildings.
- One or more office buildings in Zone B
- Housing (minimum 150 market units) in Zone R
- Refurbishment of Coal Drops and Granary complex

### **B.3.2 Second Major Phase**

- Complete First Phase refurbishment
- Continue enabling works
- Multi-storey car park
- Office development in Zones B, P, R, S, T.
- Housing in Zones R, J/Q.

### **B.3.3 Subsequent Major Phases: unspecified**

Note: The Implementation Strategy indicates Zone A would be unbuilt by end of Second Major Phase as would half of Zone B, much of Zone T, the Zones fronting York Way and the northern part of the Main Site (R/S). Equally unspecified is the Islington Triangle development.

## **B.4 MANAGEMENT/MAINTENANCE OF THE PUBLIC REALM**

The Public Realm Strategy advocates the creation of customised Management or Neighbourhood Trusts, which could allow some areas of the Public Realm to be publicly adopted whilst others remain private. These trusts would be a partnership between LB Camden, Argent St George, Community representatives and relevant stakeholders.

## **B.5 “BELOW THE LINE” SUPPORT DOCUMENTS**

These are not part of the Planning Applications but will be used to assess them, and in negotiations between the developer and LB's Camden and Islington: -

### Evolution of the proposals

- Urban Design Statement
- Urban Design Guidelines
- Initial Conservation Plans (for retained heritage buildings)
- Statement of Community Involvement
- The Triangle Site: Explanatory Statement

### Policy and Assessment

- Environmental Statement (including 11 specialist Topic Reports)
- Transport Assessment and Green Travel Plan
- Retail Impact Assessment

- Planning Statement

Future Implementation

- Implementation Strategy
- Environmental Sustainability Strategy
- Public Realm Strategy
- Code of Construction Practice
- Regeneration Strategy

## **SECTION C: DETAILED ANALYSIS**

### **C.1 FUNDAMENTAL CONCERNS**

King's Cross Railway Lands Group (KXRLG) have raised a number of fundamental concerns with both LB's of Islington and Camden regarding: -

- The manner and procedure for revising/adopting the Planning and Development Brief
- The legitimacy of the King's Cross Central Planning Applications
- The considerable lack of clarity and thus the difficulty of effective and genuine public consultation/determination.

The KXRLG considers that no permission should be given for a total office/commercial floorspace exceeding the 300,000 m2 envisaged in the DRAFT Camden Planning Brief. The Draft was heavily criticised by individual and group members for being too massive, especially in its office content. The revised (adopted) Camden and Islington Brief, far from scaling down the office content, increased it by 33%, at the request - we are given to understand - of no-one other than the present applicant. This fundamental change was not drawn to the attention of consultees and was not even drawn to the attention of Councillors before they adopted the revised text. The KXRLG considers that this higher figure entirely lacks legitimacy and may well lack legality.

A fundamental objection to the applications is to the very large maximum floorspace sought and to the extreme flexibility sought in the land-use composition. These points have been made powerfully by many speakers in every meeting we held, and in almost all the written submissions from individuals and member-groups. In particular:

(i) Consent to these applications 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, a far longer time-scale than the Mayor's *London Plan*. The planning authorities, if they approved applications of this type, would be failing in their responsibility to regulate the development as time unfolds - in response to the development's own performance, the actual growth of transport capacity, changing environmental imperatives, market demands and social needs. The continued growth of demand for large corporate office blocks is highly controversial; public transport's safe capacity at King's Cross may not reach the level required to accommodate over 30,000 jobs on the site alongside all the other users; massive long-distance commuting may come to be seen as un-sustainable and the environmental imperatives may force us to maximise housing in central London in order to reduce such flows, or require that office buildings have narrow enough floors to convert to housing with natural ventilation.

(ii) The multiple possible combinations of building mass, height and usage in the outline planning application make it impossible for citizens and the Councils to consider the impacts on listed buildings, conservation areas and views which are the subject of full planning applications. It is far from conventional practice to entertain an outline planning application for very substantial development in two Conservation Areas affecting

numerous Grade 1 and 2 Listed Buildings. (It may also be contrary to the advice of English Heritage and CABE on tall buildings.) To do so sets a serious precedent for the future throughout the UK.

(iii) Instead, permission should only be given for a development at the small 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.

(iv) In case the applicants respond that a smaller scheme would be "not financially feasible", we should point out that (a) a more modest scheme would require less finance to be raised, (b) a more genuinely-mixed scheme would be more financially robust through reduced exposure to the volatile office market (c) if, in the end, the scheme had a lower money value than the applicants would like, the main losers would be HM Treasury, who would have to increase their subsidy to LCR somewhat.

**For example:**

The arrangements proposed for Station Square extending to the southern end of the proposed boulevard are recognised in the application as "transitional" pending a clear decision on the future funding, planning and programming of construction of the new Western Concourse to King's Cross Station and inter-linkage with the LUL Northern Ticket Hall.

The total "up to" m<sup>2</sup> applied for in Table 1 of the Development Specification represents 896,470 m<sup>2</sup> - i.e. 125% more than the actual total floorspace applied for. Even the total amount of floorspace applied for in Table 1 of the Development Specification does not include the additional 32,000 m<sup>2</sup> basement area proposed south of the canal and the 51,500 m<sup>2</sup> basement area proposed north of the canal. I.e. the development for which planning permission is actually sought amounts to a grand total of 801,775 m<sup>2</sup>.

The recent decision of the Secretary of State in respect of the Stanhope Croydon Gateway development may well be material in securing further detailed information/revisions before considering and determining the current Argent St George proposals.

Under these circumstances, the application is not only highly controversial but lacking in sufficient detailed information, and may well also be premature. **Wherever possible, revisions should be effected 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.**

## **C.2 MASTER PLAN: OVERALL LAND USE, URBAN DESIGN AND DENSITY**

KXRLG and many other groups consider that the proposed development is far too large, far too dense and far too dominated by offices. The proposals would dwarf the surrounding areas and be intrusive both into views from outside and within the site.

### **C.2.1 Densities and Building Heights**

These vary across the site, from approx 5-12 storeys south of the canal to approx 15–19 storeys eg in Zones P, S, R and the Islington Triangle (all to the north –east of the View Corridors). This is contrary to the assumptions made in para 2.2.4. in the Planning and Development Brief (where the highest densities are envisaged to be in the southern part of the site).

The factors set out in para. 2.2.4. such as the sensitive environment of the canal and the listed buildings, merit careful treatment in terms of urban design and density. The present proposals are widely considered by KXRLG and others to be careless in their treatment of these distinctive features of the Opportunity Area. Eg the top of the St Pancras Clocktower spire is 74.7m AOD: Maximum building heights shown on Parameter Plan KXC 014 indicate Zone B at 70.0, Zone A at 72.0, Zone T at 76.0, Zone P at 72.5, Zone S at 84.0 and Zone R at 78.5m AOD.

At these densities, even as striking and unique a local feature as St Pancras Clocktower spire is likely to be submerged and nearly invisible in views from both inside and outside the new King's Cross Central development.

KXRLG member groups' views on the proposed urban design and density/building heights include: -

- Does not match that of surrounding area – the urban grain of Camden Central, Bloomsbury and West Islington has relatively few tall buildings, has wide roads and streets and spacious squares;
- Building heights will impact on views in the wider area (e.g. views of the grade 1 listed Barlow Shed, which are very important, will be obscured);
- Block T, which is twice as high as the adjoining CTRL on embankment, will intrude into views from Elm Village and the north west including Agar Grove and Maiden Lane Estates and even further beyond;
- Extremely detrimental effect on Camley Street Natural Park, the canal, and the wildlife in the Regents Canal conservation area;
- Proposed building heights will swamp the Conservation Area to the north of the canal.

The current development of the P& O site south of the canal has been consistently praised as a model of how to carry out sensitive development under such circumstances. It is widely held that this is a model that should inform development of the Opportunity Area, both in terms of retention of heritage buildings and even smaller features, as well

as an appropriate mix of uses including residential development and a range of new building none more than 6 or 7 storeys high,. By contrast, the Argent St George proposals appear insensitive and on occasion monolithic, certainly far from being “well integrated with surrounding areas” (UDP Policy SKC2)

The proposals for the Islington Triangle represent considerable over development of the site (584 hab rooms per ha). The 200 units specified in the Joint Planning Brief should be the absolute maximum number allowed on this small and severely constrained site.

Accordingly KXRLG would wish to see the following revisions: -

- Building heights should be halved/limited to 7 storeys (approx. 21m).
- Buildings alongside the Canal and Camley Street should not be maximum 12 storeys high. They should respect the recent decision by Camden to reject the proposed development at Star Wharf and Pratt Wharf (application number 2003/1098/P) because they were higher than 4 floors, and these buildings should be stepped back from the canal floor by floor to avoid overshadowing and local domination of an extremely sensitive environment
- Buildings should generally be stepped back, e.g. from the boulevards, which would also reduce canyon effects and provide more space for green roofs.
- Development on the Islington Triangle reduced to an absolute maximum of 200 units as specified in the Joint Planning Brief

### **C.2.2 Land Uses**

Land Uses are equally perceived by KXRLG and others to be seriously imbalanced in favour of office (B1) development and deliberately designed to create a large footplate inflexible and unsustainable office “ghetto” on all the land south of the canal. If the maximum office floorspace applied for is permitted, only one third of the total is left for all other uses.

This is not mixed development as advocated in Planning Policy Guidance Note 1, adopted UDP policies SKC 2 and 3, and paras 2.2.5 and 2.2.6 of the Planning and Development Brief. Nor is it properly integrated into the surrounding predominantly residential areas.

A lower level of development altogether - with better balance allowing for more residential and community, cultural, leisure and recreational uses - would command considerable support.

As on the P & O site, there is strong support for a significant residential element to be included south of the canal – including development directly overlooking the canal from

the south – so that the canal towpath would be permanently overlooked, encouraging “eyes on the street” at weekends and in the evenings

KXRLG is concerned at the extent of Basement usage applied for. We consider it could become additional office and/or car parking floorspace, as well as adding to the construction impact of the whole scheme

Many concerns have been raised at the intention to provide the main residential components of the scheme in the northern-most high-rise zones. Families are not normally housed above the fifth floor and these blocks rise from 12 to 19 storeys. The subdivisions of eg Zones P, S and R show small internal courts, potentially overshadowed by high density development all around, within smaller sub blocks defined by the primary and secondary road network. The environments created – particularly during the early incomplete phases of the development, have been generally considered unsatisfactory for families with children, the elderly etc.

There is strong support for a range of business and office floorspace, including space for small and medium sized enterprises which are considered more likely to employ local people, and for cheap accommodation (ideally at a peppercorn rent) for the many community and voluntary sector organisations in the area.

There is already an oversupply of office floorspace in the City and West End of London. Office working may well be superceded by homeworking and “hotelling”, and office floorspace is likely to be used more intensively in the future.

A variety of views have been expressed about the proposed London Institute (Zone L). On the whole Higher Education uses such as this are considered valuable but not at the expense of much needed community uses such as a Primary School. The kind of environment created would be valuable culturally and also for keeping the area alive all the time. Equally the employment provided would be better staggered and diversified, when compared with corporate offices.

Accordingly KXRLG would wish to see the following revisions: -

- Reduction in total floorspace
- Better balance between office development and residential, community, cultural, leisure and recreational development
- Better range of small medium and large sized business/office accommodation, with some specifically reserved for local community and voluntary sector occupation.
- Residential accommodation provided south as well as north of the canal. Residential accommodation provided in the north of the Opportunity Area should be laid out to create an environment suitable for a wide range of population including the elderly and families with children

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- Basement floor space should be included in the overall figures for the development (maximum 718,275m<sup>2</sup>) and not be in addition
- Inflexible large footplate developments should be avoided as far as possible. Building forms should allow for flexibility and adaptation to changing circumstances.

## C.3 MASTER PLAN: PUBLIC REALM AND LAYOUT

### C.3.1 Overall Completed Layout

Many concerns have been expressed about the kind of environment/image being created in the Public Realm – more “marketable” to new office employers and workers – often young single people – and less attractive to residents in the surrounding communities. This could become a polarized “us and them” development. This may be further compounded by the style of management proposed and even potentially by the style of architecture (see 4.5 “Places” – Urban Design Statement). Very few civic spaces are indicated in the current plans for the development, and those that are proposed are small and lacking in any vegetation. Only 250 new trees are proposed to be planted within the whole development. Residents, workers and visitors would have to cross busy roads to get to the few civic spaces, which, anyway, in this high density development, are inadequate for the numbers of people projected to be in the area, or wishing to come in from the surrounding communities.

KXRLG is concerned that since the Second Phase of implementation is not completed until around 2017/2018, and this does not appear to include the Islington Triangle development, the demolition of the Plimsoll Viaduct and creation of the northern boulevard remains a seriously illogical element of the whole proposal. There will be nowhere/no reason to walk through the site north eastwards from Zone N and the canal, to the realigned York Way. The Plimsoll Viaduct could be put to temporary use. For residents of Maiden Lane and beyond to the north east, it would be far safer to stay on the refurbished York Way until one got to the realigned Goodsway or King's Cross itself.

Members of the Canal Group are concerned that the current proposals for the Primary Route over Goodsway and the Canal will prejudice the long-term opening up of the Canal Basin and its connection to the canal. Similarly, several KXRLG member groups are involved in drawing up alternative options to retain Culross Buildings, for the Gas Holders, to protect and enhance Camley Street, for the Long Park etc. The nature and even layout of the Public Realm could well change radically if any or all of these options are seen to have some real merit.

### C.3.2 Street Environment

There is much concern that existing and future streets make up too much of the public realm and that this together with the proposed number of parking spaces (approx 1800) will mean that

- the development will not be people or cycle friendly
- the level of emissions from vehicles would be unacceptable.

Public transport use, walking and cycling are not sufficiently facilitated but are necessary to create a healthy, environmentally friendly development.

### C.3.3 Parks

The extremely small park in the proposals is inadequate. It is nowhere near the 1ha specified in the Planning and Development Brief. There should be at least two more, one of which should form a setting for the re-erected gas holders (see Gas Holders below)

and the other an extension to Camley Street Natural Park (see Camley Park below).

### C.3.4 Squares

Apart from Station Square (which is transitional and eventually will be substantially occupied by the Western Concourse to King's Cross Railway Station) and Granary Square, the squares are very small.

- **Canal Square** is situated at a major traffic junction, which will be dangerous.
- **North Square** is tiny and it is proposed to consist predominantly of shops/food and drink/community and leisure uses at ground level as part of sub area U in the middle of it, not the common conception of what a square is in Central London. It is not "... a focus for the long view up York Way..." and it does not "... define a northern gateway to King's Cross Central" as called for in the Joint Planning Brief.
- **Market Square** has a sub area in the middle of it, which makes it less applicable as public realm.
- The status of the **Midland Yard** is ambiguous in the plans because it is hatched and part of the hatching is the colour used for public realm, but the hatching appears to give it a separate status without indicating what that status is.
- **Granary Square** appears to be set to become a particularly hard-edged area of public realm. This hardness should be softened by the addition of trees and shrubs. A water feature would not be unwelcome at Granary Square as long as it is not large enough to overwhelm the view of the south face of the Granary.
- It is extremely important to bore exploratory holes into Granary Square before work starts on any refurbishment to discover the nature of the materials used for infilling of the basin: if these materials are toxic or noxious then mitigating action would have to be taken. This is a 'worst case' scenario, which has not been considered.

The plans show the very small pavilions (Zones G, H and O) to be predominantly shops/food and drink/community and leisure uses, and it is difficult to see that any developers would want to see anything other than shops and food and drink outlets in them. Where then do other community uses go?

In the only plan where **Market Square** is actually named, there is no indication that the pavilion (zone O) is a part of it. It is not a square in the traditional sense that London Squares have been laid out. Zone O should be removed and the 'long park' should be extended southwards through Market Square and zone O. The 'boulevard' could then be extended uninterruptedly along one side of it for pedestrians only.

The Joint Supplementary Planning Guidance for York Way has yet to be published, and it would not be appropriate to determine this application until adequate opportunity is afforded to assess it in the light of that Guidance. (NB Implementation Strategy suggests much new development would not be completed along York Way until after 2017 /18,

assuming "economic conditions are favourable" throughout the intervening years.)

### **C3.5 The Long Park**

KXRLG is very concerned about the proposed 'Long Park'. Landscape Proposals Plan LPP 110 indicates that it is approx. 0.4 ha. It is 168 m long and between 35m wide and 15m wide at its narrowest point at the north-eastern end. It is adjoined on both sides by pedestrian/vehicular sealed gravel access ways 7m wide. It is subdivided into four separate soft landscaped/paved areas/planters. It does not appear to have any defined equipped play area. As such, it is more an elongated square than a park and will not be safe for young children in particular and pedestrians in general.

In this predominantly commercial area, with thousands of residents and workers, the proposed 'long park' does not provide nearly enough capacity or amenities. It is so small that only a very small percentage of the workers and residents on/off site will ever be able to use it at one time, let alone visitors or tourists.

The Long Park should be of equal width from York Way in the north to the northern part of Sub Area M, uninterrupted by roads, and full of trees and greenery except in those spaces where seats and benches are provided for people to sit.

Provision of well landscaped, green public open space within the Public Realm does not appear to have been adequately addressed by these proposals. There is less green space proposed here than exists at Canary Wharf (at Jubilee Gardens and Canada Square).

Accordingly KXRLG would wish to see the following revisions/action:-

- More of the proposed Public Realm should be designed and provide facilities that positively encourage families with children, the elderly and others from both the new housing areas and surrounding communities to use and enjoy it.
- Unless development of the Islington Triangle is brought forward into the first phase or early in the second phase of development, the Plimsoll Viaduct should not be demolished. It should instead 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 which is well located and equipped for safe use by residents and others living/working both on and off site
- No determination of these proposals until they have been assessed in the context of Joint Supplementary Guidance for York Way

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- Marked reduction / rationalisation of vehicular routes throughout the new development and increased priority for pedestrians and cyclists (see also Transport 7 below)

## C.4 CONSERVATION / HERITAGE

### C.4.1 Overall

Heritage buildings and heritage small works should be conserved since:

- The character of King's Cross Central has already been changed substantially by the CTRL works and further change will take place before 2006/7. It is important that some reminders of the past are left intact
- The conservation of the few remaining Victorian buildings and smaller works would enhance the status of the new buildings and public space (e.g. the recent restoration of the western wall of the German Gymnasium shows how impressive Victorian brick buildings can look after restoration)
- Environmental Sustainability: Heritage buildings contain embodied energy - that is all the energy it took to build them including bring the materials to site - and that energy should be conserved rather than wasted
- Pancras Road should not be realigned to isolate the German Gym and Stanley Buildings from St Pancras Station

Public opinion is very strongly behind conservation (particularly of Stanley and Culross Buildings and the Gasometers). The developers' assessment of 'low to moderate' sensitivity is a serious underestimate. Small details scattered around the site (eg. gates, cast iron structures, walls) are also very important, and should be conserved/incorporated into the new development.

### C.4.2 New Buildings in proximity to old

The new buildings should be on a similar scale to the retained buildings where they are close to retained buildings. E.g. north of the canal, the proposed tall buildings will swamp the existing - the new build should start at 4 storeys. Para 2.14 of P.P.G. 15: - "In general it is better that old buildings are not set apart but woven into the fabric of the living and working community. This can be done, provided that the new buildings are carefully designed to respect their setting, follow fundamental architectural principles of scale, height, massing and alignment and use appropriate materials."

If a sub area is built in one massed block near retained buildings, then that sub area should be stepped back in stages of one floor at a time, so that the retained buildings are not dwarfed by the new ones and some sense of appropriate scale is retained

The proposed plans for the Southern Character Area with the current footprints of sub areas A and B should be rejected.

### C.4.3 Public Access

Concerns were raised not just about retaining but how the buildings will be used...

There should be public access to Listed buildings and Conservation Areas as stated in the Planning Brief. We do not want our heritage to be appropriated for purely commercial purposes. In the proposals, the Granary, Eastern and Western Goods Sheds, Midland Good Shed and the East and West Handyside Canopies appear to be outside the public realm - ie. not publicly accessible. This should be rectified.

#### **C.4.4 Sight Lines / Visibility**

Two of the most important local landmarks are the Grade 1 listed railway stations (King's Cross and St Pancras). The views to these stations should be maintained from as many parts of the site and beyond as possible.

From the illustrative pictures provided to support the outline planning application, only a very tiny part of the Granary facade will be visible from the south of the site, and only the very top part of the historic train shed of St Pancras will be seen from all over the site if the development goes ahead to the maximum heights proposed. This is unacceptable. The scale and layout of the new development needs to retain and capitalise upon these views

#### **C.4.5 Heritage Centre and Route**

The unique Victorian railway/canal/transport heritage of King's Cross should be set out, illustrated and celebrated in a Discovery or Heritage Centre in the Southern Hub, and possibly connected to the Granary Complex (Zone I) and the canal by a Heritage Trail.

#### **C.4.6 Stanley and Culross Buildings**

KXRLG and other local groups are strongly of the opinion that the remaining Stanley and Culross Buildings should be retained in their entirety (NB already 3 of the 5 Stanley buildings have been destroyed) since:

- They have been in place for over a hundred years, they are enormously important in the character of the south of the site since they are intimately connected with the development of the railways and they are one of the very few features remaining in the south of the site which indicates its social history.
- The buildings have been designated as social housing, and could be brought back into use as social housing.
- The developers admit that the value of the Grade 2 listed Stanley Buildings at 2006/7 is High and that of the Culross Buildings, even though they are not listed, is equally high.
- The space is just as important as the building, and an important illustration of the alleyways of another age. Therefore both North and South Stanley Buildings must be retained. (The replacement Conservation Area Statement for King's Cross (2003) speaks highly of the space between the two Stanley Buildings and of it being of equal importance of the buildings themselves). Similarly it will be

important to include a visual/movement connection between Stanley Buildings and Culross Buildings.

- It is unsustainable to demolish houses and then rebuild somewhere else. They can provide much needed additional social housing at a critically important point south of the canal
- Open balconies should not be blocked in (as proposed for Stanley Buildings South) since these are a historic feature, being among the first of their kind in the country and one of the major reasons that the Buildings were listed in the first place.

Alternative proposals are being prepared by the King's Cross Conservation Area Advisory Committee. These include:

- Resisting the realignment of Pancras Road alongside the extension to St Pancras Station since this will isolate the German Gymnasium and Stanley Buildings South from their original context, and their meaning and relationship to the stations would be lost.
- Plotting an accurate position for the proposed boulevard cutting across the existing Culross Buildings (this appears to be at the eastern end, close to Culross Hall). Thus potentially to just demolish eastern tip or to knock through part of the ground floor to allow for a pedestrian boulevard
- Putting forward alternative proposals for the 'southern hub'

Some members have questioned the logic of the southern boulevard (and thus the argument for demolishing Culross) and the need for a sight line through to the north of the development – “things don't have to be so obvious and it's nicer to discover things for yourself”.

#### **C.4.7 Other Heritage Buildings / Structures:**

- **Great Northern Hotel**

Temporary uses should be found for the Great Northern Hotel as soon as possible so that it is not left to fall down but negative effects should be guarded against.

- **Goods Yard**

The Regent's Canal Conservation Area Statement (2001) stresses the intactness and group value of the Goods Yard.

- **Regeneration House**

This looks isolated. Possibility of 4 storey development alongside.

- **Gas Governor**

The Gas Governor should stay where it is, because it too contributes to the group value of the Victorian structures and gives the complex much of its character.

- **Western Goods Shed**

Remnants of important and unusual walls should be kept, such as those on the west end of the Western Goods shed.

- **Plimsoll Viaduct**

Should be retained and refurbished to capitalise on the unique potential of the stables, the coal drops and the huge open spaces on the lower level. Also important to be able to see it!

(see revisions/action recommended in 3 above)

- **Regents Canal**

This dates from 1820 and predates all the above mentioned heritage buildings. It should be embraced by the scheme, to become a feature rather than a side issue. The Regents Canal Group are trying to get English Heritage to classify it as an Ancient Monument. There is a possibility of reopening the Granary Basin. Need to safeguard possibility of future reopening by aligning proposed new bridge for primary route so as to permit it. (High voltage cable could be moved when next rewired). (See revisions/action recommended in 3 above)

- **The Gas Holders**

The plans suggest that the guide frame for gas holder no. 8 be removed and re-erected as a free-standing structure on the north side of the canal, between the proposed multi-storey car park at the southern end of Zone T and the re assembled Siamese triplets (proposed residential Zone N). It would provide a focus for the proposed Cultural and Visitor Attractions Cluster and would enclose new play facilities for 1–8 year olds and 8–16 year olds together, with possible low level rock climbing.

A range of ALTERNATIVE PROPOSALS are being considered by KXRLG and its member organisations. The reasoning is as follows: -

- The gas holder guide frames have been actual landmark structures for a very long time, and not potential ones, as Argent St George claim. They perform this function far more effectively with their lattice construction exposed. In the future, the gas holders should have their structures exposed or enhanced.
- Gas holder No 8 is the only remaining gas holder in situ. If kept in place, Gas Holder No 8 could provide added character to otherwise conventional office development south of the canal and could provide a distinctive feature in any future revision to the alignment of the southern boulevard. E.g. it could be used for markets, fetes, festivals, fairs and performance spaces, thus enhancing the viability and vitality of this part of the development and creating a lively, colourful feature along a realigned boulevard from the Southern Hub to Granary Square, and not far from the CTRL concourse.
- New playspace, particularly for 1–8 year olds, ought to be located as near as possible to the proposed new housing on site. The proposed location is some

distance from Zones S, R, Q and J (the principal residential areas apart from Zone N). It adjoins a multi-storey car park and the canal, and is a focus for tourist and visitor attractions, not entirely compatible with children's play!

- The Siamese Triplets (Zone N) could form the basis of a reasonably sized public park, large enough to accommodate them without having anything inside them to restrict views of the stark lattice structures. They could also accommodate public viewing platforms which would be at the tops of the gasholders as it is unlikely that there will be public viewing platforms on the other, taller buildings.

**Other uses suggested for the gas holder frames were:**

- left empty and regarded as a sculpture
- a wildlife gardens (Külturlandschaften - a hybrid of culture and nature)
- a focal point of a new park
- used as a community arts space
- used for rollerblading
- be used as a nature reserve
- for community uses or play area
- be an integral part of the boulevard (not unanimous agreement here )

Use for housing and/or shops was generally opposed

Accordingly KXRLG would like to see the following revisions: -

- Retention of Culross Buildings and Stanley Buildings North
- 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
- Creation of Heritage Centre and Heritage Trail
- Future public access ensured to Goods Yard Complex of buildings, including Granary, Assembly Shed, Handyside Canopies etc (Zones L and K)
- Appropriate temporary uses for all the heritage buildings left standing 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 and assessed with their promoters

## C.5. HOUSING AND COMMUNITY FACILITIES/OPEN SPACE

The overall view from KXRLG is that there should be more housing provided and thus fewer offices.

### C.5.1 Numbers of new housing units

Para 2.9.5. of the adopted Planning Brief expects the “provision of at least 1800 homes within the Area and the Triangle.

The minimum residential component proposed in the Planning Application on the Main Site (LB Camden) would be 1600 units up to a maximum of 2300 units, with a further 250 units on the Islington Triangle - i.e. a range of 1850 up to 2550 new dwelling units. These are to be high density to reflect the excellent public transport accessibility within the site – i.e. 30 to 50 dwellings per hectare.

In principle, KXRLG would support maximum numbers of new dwelling units, particularly family housing, on the Main Site and within the Triangle.

Reasoning:

- Great housing need / demand in the surrounding area and in LBC and LBI in general. Within LB Camden this is by far the biggest “brownfield” development site - building 2,300 new homes here will still leave Camden with a shortfall of 14,640 on its Housing Waiting List to make up.
- Community Safety: More homes = more people = more eyes on the street around the clock = increased safety for all people on the site, residents, workers and visitors alike.
- More residents will keep the site alive at weekends and encourage shops to stay open 7 days a week rather than shut up for weekends. This is especially important north of the canal.
- More residents = less commuting - i.e. more people who live within easy walking/cycling distance of their work.
- More residents, particularly families with children and the elderly, the more chance of a vibrant sustainable community developing with a real stake in the future of King's Cross, its services and amenities.
- More residents – particularly families with children – the more demand/need there will be to provide the kind of community, cultural, social, health education, leisure and recreational infrastructure on site required in Sections 2.10 – 2.13 of the adopted Planning and Development Brief.

### C.5.2 Housing Tenure

Para 2.9.16 of the adopted Planning and Development Brief requires that:

“Of the first 1000 additional units in the Area, 50% should be affordable, apportioned as 35% social housing for rent and 15% for essential workers and other intermediate occupiers. For units over and above the first 1000, the Councils have a target of 50% affordable housing, including a significant element of social housing for rent and housing for essential workers but may also include other forms of low cost housing.” This is very

much in line with the 50% requirement for affordable housing contained in the Mayor's London Plan.

The amount of affordable housing to be provided is NOT specified in the Planning Application. However there is a clear indication in paras 12.7.73 – 12.7.91 that the developers would prefer to provide more intermediate and less social rented housing to get people onto the housing ladder and due to the existence of high levels of social rented housing already in the surrounding areas. Para 12.7.75 notes the potential problems associated with social rented housing including lack of long term care of property, health, crime, pressure on services and educational under-achievement.

The developers propose 35% of housing in the Islington Triangle as Key Worker accommodation (approx 92 units). It should be noted however, that as it stands, development of the Islington Triangle will not occur until the final phase of development (earliest 2017). No affordable housing is proposed in current planning applications to develop the St Pancras Chambers, although off-site contributions may be available depending upon a final independent financial appraisal.

KXRLG considers that, in line with the London Plan, all homes should be adaptable to accommodate adjustments for mobility impairment over the lifetime of the occupants. There should also be a proportion of residential properties for all income levels and household sizes, which are wheelchair accessible, habitable, of high quality and with adequate space for a good quality of life.

Phasing : Triggers should be included in the consent that require provision of housing and affordable homes at each phase of the development before work can start. The provision of affordable housing is one thing that has nothing to do with market trends. Housing of both types should be provided north and south of the canal from the first phase to encourage the early growth of a viable community.

Other: The 12 residential moorings at Goods Way should be retained and extended with improved canalside facilities for the boatowners. The extra moorings should not be sited opposite Camley Street Natural Park. The Stanley and Culross Buildings should be renovated for residential use - to demolish these two buildings and replace the number of residences in them in the wider development is unsustainable practice.

### **C.5.3 Social Housing mix**

Para 2.9.13. of the adopted Planning Brief requires 20% 1 bed; 30% 2 bed; 30 – 35% 3 bed and 15 – 20% 4 bed or larger.

On the Main Site the developers propose: "Of the first 1600 units, 40% would be studio/1 bed units; 37% 2 bed; 18% 3 bed and 5% 4 bed.

KXRLG would require a specific commitment to affordable housing (numbers, tenure, mix, location and phasing) and, in particular, to social housing for rent as required by the

adopted Planning & Development Brief, before any applications are determined. We support the stance taken in the adopted Planning Brief on housing tenure and mix. We would prefer to see more family than single person housing, of all tenures, because that would help create a truly sustainable community with a real stake in the future regeneration of King's Cross, its services and amenities. It would also help to fully (socially) integrate the new development into the surrounding areas.

"Sustainable Communities" commissioned by the Office of the Deputy Prime Minister (2004) states that sustainable communities require a mix of social (rather than affordable) and private housing.

KXRLG members have asked for much more detail on the Applicants' proposals for affordable housing - e.g. are they intending to set up their own Registered Social Landlord? how will they deal with nomination/allocation rights? Who are going to be the managing agents of the housing?

#### **C.5.4 Housing Design and Construction**

KXRLG Members would like to see a strong emphasis placed upon lifetime homes and ecological housing design and construction. Social Housing projects such as BedZed show this can be successfully achieved. Housing design and construction should meet the highest BREEAM standards. In terms of Environmental Performance, the applicants state that "At least 15% of the roof area of the new buildings constructed within the development would be 'green'/'brown' roofs (or equivalent systems)." This should be higher.

Accordingly KXRLG would wish to see the following revisions/action: -

- Support provision of maximum 2550 new dwelling units, but we wish to see a far greater emphasis within this, towards provision of more family accommodation – 2, 3,4 bed units and fewer studio/1 bed apartments
- This new housing should be on top of the exiting social housing units in Stanley and Culross Buildings and the canal boat dwellers.
- A specific commitment to affordable housing (numbers, tenure, mix, location and phasing) and in particular social housing for rent, 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 which is 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 to encourage the early growth of a viable community.
- 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
- Design and construction of new housing should meet the highest BREEAM standards
- The aspirant figure for green/brown roofs should be increased and these roofs should contribute, along with trees and other green spaces, to the development of a wildlife corridor from south to north through the site.

## **C.6 HEALTH; EDUCATION; CULTURAL AND COMMUNITY FACILITIES (D1); LEISURE, RECREATION (D2) AND OPEN SPACE**

### **C.6.1 Introduction**

Sections 2. 10–2.13 of the adopted Planning Brief set out requirements based on the anticipated demand from new workers, visitors and residents anticipated in the Brief. Some are more specific (“will”) than others (“may”), and quite rightly the option of mixing and matching new development on site with upgrading existing facilities in the surrounding areas is canvassed.

In referring to these elements of the regeneration package put forward by Argent St George, it is worth remembering that some 40,000 m<sup>2</sup> of the max 75,765m<sup>2</sup> D1 uses applied for is allocated to the proposed London Institute University of the Arts campus within Zone L. Other D1/D2 uses referred to in the Main Site application could be provided IF NECESSARY AND APPROPRIATE.

KXRLG believes that wherever possible the new development should include new state-of-the-art facilities, affordable and accessible to all, rather than just upgrading already hard pressed and often ill-housed existing facilities. New state-of-the-art facilities will be used by the new population as well as the existing population, whereas upgraded existing facilities might not appeal to the new population and thus real social integration and stake holding might not occur. Ideally both new build and upgrading should take place. This whole subject does however require far more local consultation and debate.

In the Specialist Socio Economic Report of the Environmental Statement, much emphasis is placed upon crèche / health centre facilities to be provided in the Islington Triangle – but these may not appear until 2017 at the earliest! If the proposed Medi-Centre and crèche are to have any local value, the Islington Triangle element of the development needs to come forward for implementation to Phase 1 or very early Phase 2 in the Development Programme.

While broadly welcoming the proposed higher educational element of the proposals (see 2 above), this should not be at the expense of a Primary School and other D1 uses within the new development.

### **C.6.2 Health**

Para 2.10.7 expects that the new population will require: -

- Integrated Primary Health Care Centre and support facilities
- Residential care places
- Day Centre for the more active elderly
- Residential, day-centre, respite and outreach services in accordance with Government Community Care policies.

Apart from a specific commitment to a Health and Fitness Centre, Medi-Centre and crèche in the Islington Triangle, there is no/limited commitment to any/all of these health facilities within the Main Site.

KXRLG considers there is a need for an NHS Walk-In facility in Phase 1 of the development to cope with passengers and tourists/visitors rather than overloading UCLH Casualty Dept. and local GPs. The kind of densities and environment created in the proposed new development could well be intimidating to many elderly and disadvantaged people. KXRLG are seeking revisions to change this situation - revisions of the kind that would open the development up to the widest demographic and socio economic profiles – reflecting indeed the surrounding communities themselves. Under these circumstances, we would expect to see more of the kind of facilities set out in the Brief included in the new development.

### **C.6.3 Education**

Paras 2.11.4. of the Planning Brief indicates the following may be required within the Area and the Triangle or accessible to it :-

- Two form primary school age provision with attached Sure Start, Children's Centre and health and social care for 0 –11 year olds
- Provision for secondary school age provision eg by adding to South Camden Community School and including adult and community learning provision with childcare
- Additional Sure Start funding and enhanced 0 –19 benefits such as bursaries
- Appropriate provision for youth activities, facilities and services such as Connexions.

It is estimated that the completed development (max 2550 units), including the Islington Triangle, would create a child population of between 757 and 1025 across the site. Para 12.7.116 of the Environmental Statement makes it clear that no Primary School or indeed very little else set out above is to be provided within the new development. In this event, para. 12.7.114 indicates that this could result in increased pressure on local schools of up to an additional 123 places in existing Primary Schools and 470 additional places in existing Secondary Schools.

Concomitant with wanting to see more family and less studio/1 bed housing on the site, KXRLG recognises that the child population would increase to a point where a new Primary School and other support services would have to be provided on site. Many of the existing education and youth facilities accessible to the Area are aged and on constricted sites with sub-standard facilities.

### **C.6.4 Leisure, Culture and Community facilities**

Paras. 2.12.2 and 3 of the Planning Brief indicate opportunities for new facilities which should include: -

- Youth facilities and very high quality indoor/outdoor play areas
- Community Centres(s) possibly associated with places of worship
- Indoor recreation and sports hall

- Swimming pool(s)
- Library and tourist information points
- Visual arts centre
- Contributions to arts programmes and public art works
- Enhanced facilities for canal users

The proposed development includes a range of Health Clubs and other indoor sports facilities, scope for low level rock climbing in Zone N, boule, tennis, wall tennis, 5 a side football and possible ice skating, outdoor performance areas etc within the public realm – principally Granary Square and the Long Park. A Visitor/Exploratory Centre is also proposed – initially in a temporary building. Other facilities may emerge as discussions with the London Institute unfold.

KXRLG has long advocated the need for high quality Leisure, Cultural and Community facilities of the kind canvassed in the Brief. There is certainly a need to recognise the multicultural quality of the area e.g. through provision of a new Multicultural Centre on the site. In principle, we would prefer to see more new facilities of this kind incorporated into the new development rather than just upgrading existing, often limited, facilities. Such facilities need to be affordable and accessible to all.

### **C.6.5 Open Space**

Para 2.13.8 of the Planning Brief indicates that open space provision is likely to include: -

- Minimum 1.0 ha local park – green space that is accessible, safe, secure, and designed for both active and passive recreation
- A range of children's play areas and facilities
- Different public open spaces

The proposed Public Realm contains many of these features, including the Long Park, Granary Square, re-erected Gas Holder No 8 (Zone N) and Station Square. KXRLG member/Working Group comments on these are set out in Section 3 above. One further comment has however been received regarding Camley Street Natural Park: -

“The southern/eastern end of the park should be conserved and enhanced. The district gas governor should not be located there. Instead, the park should be extended into the available space”.

Accordingly KXRLG would wish to see the following revisions/action: -

- Wherever possible the new development should include new state-of-the-art D1 and D2 facilities, affordable and accessible to all, rather than upgrading already hard-pressed and often ill-housed existing facilities. New state-of-the-art facilities will be used by the new population as well as the existing population, whereas upgraded existing facilities might not appeal to the new population and thus real social integration and stake holding might not occur.
- This requires much further local debate once more information is known about the kind of additional pressures likely to be placed upon existing facilities and what standards of upgrading will be achieved.

KING'S CROSS RAILWAY LANDS GROUP

response to the King's Cross Central planning applications by Argent St George

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- 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/elderly population increased within the new development, and thus new health and education as well as community, cultural and leisure facilities accessible and affordable to all, incorporated into the new development.

## C.7 JOBS AND TRAINING

### C.7.1 Jobs / Floor Space

The developers estimate that 32,500 new jobs are likely within firms moving to the proposed development. This appears to be based on an assumed 16m<sup>2</sup> per worker (max 486,280 m<sup>2</sup> B1 applied for) plus other employment generated from A1-3, C1, D1, D2 etc uses. This level of job creation is nearly 3 times the London Plan projection for the King's Cross Opportunity Area (11,400 min). While the Group is in favour of new jobs and training for local people, the strong consensus is that this is too much – we think it should be reduced to 17,000 new jobs i.e. 150% of the London Plan target, the reduction being entirely effected from the proposed B1 (office) element.

#### Reasoning

- There is strong agreement throughout the consultation (see 2 above) that the present proposals constitute grave overdevelopment of the site and are seriously imbalanced in favour of B1 office floorspace.
- A far more sensible way of proceeding would be to estimate the “holding capacity in terms of gross floorspace” of each development area, given certain Conservation, Urban design, townscape, transport and other constraints. A similar approach was adopted by LB Camden in relation to the earlier LRC development proposals.
- If the maximum amount of major employment uses - A1–3 (shopping, food and drink, 45,925m<sup>2</sup>), B1 (offices, 486,280m<sup>2</sup>), D1 and D2 (cultural, educational etc, 107,315m<sup>2</sup>) applied for, were granted, then 89% of the total 718,275m<sup>2</sup> would be taken up with employment type uses!
- If the absolute scale of the development (718,275 m<sup>2</sup>) is to be reduced and a more mixed, balanced and sustainable profile of land uses obtained, then the office component is the obvious candidate for reduction. The more business floor space provided, the less, within a finite total, is available for other uses (e.g. housing, community, leisure and recreation etc) all of which have commanded strong support and if anything most people would like to see increased.
- Office employment tends to leave single-use office areas empty at night time and weekends. The resulting environment can be unpleasant. In a place like King's Cross, this can only encourage potential crime and anti social behaviour.
- There is evidence of current over-supply of office floorspace in central London and the West End. GVA Grimley (Central London Office Commentary) report, “ at the end of Q4 (2003), the central London office vacancy rate had increased to 13.7% of total stock – up from 12.7% at the end of the previous quarter. A year ago the vacancy rate was 10.7% and two years ago it was 7.8%”.
- Office working practices are changing dramatically (“hot desking” “virtual office”, homeworking, “hotelling”). There is clear evidence from Gerald Eve (Consultants to the Mayor and the source of the 20m (gross) figure in the London Plan) that office floorspace ratios per employee, particularly in new large office schemes, are likely to come down from 16m<sup>2</sup> (net) to 12m<sup>2</sup> – 11m<sup>2</sup>(net) – certainly well over the predicted lifetime of the Argent St George development.
- Evidence that large footplate office development (as proposed south of the canal) is less flexible for change and adaptation to new uses.

- European and other HQ/large office schemes tend to bring their employees with them – given the relatively limited new housing on site (i.e. walking to work) – this can only lead to heavy commuting pressure on the local and metropolitan transport systems
- Present transport capacity within and around the site will not meet the demands placed on it. (see 7 below)

### **C.7.2 15% Target of Jobs for Local People**

Although the adopted Planning and Development Brief contains a clear commitment/target of jobs for local people, there is no specific reference in the application to the Developers accepting this target and entering into a constructive partnership with the Local Authorities to ensure it is delivered. The full plans for showing how the developers will ensure that this will be achieved should be made public, approved by the community and the Councils and committed to by the developers before consent is given.

### **C.7.3 Range of Business Uses**

- Needs to be a range of small and medium sized business accommodation as well e.g. small craft workshops and studios, business start up units, accessibly priced offices for non-commercial operations e.g. Voluntary Organisations, Community Groups, charities, exhibition and display space, performance space etc. Cheap office space would be a major community benefit

### **C.7.4 Training and other Local Economic Development Initiatives**

Reference is made to an Employment and Training Strategy. KXRLG Members would like to see: -

- Involvement of the King's Cross Development Forum, Camden Central Community Umbrella, King's Cross Community Development Trust and other similar community based organisations directly involved with the Local Authorities, the developers, Training providers and others in the planning, management and delivery of this Strategy
- The Strategy should include:
  - Local Labour Initiative: Construction recruitment and training, job matching, customised training/bursaries
  - Lifelong learning, education and training: Investing in Schools and Higher Education (both on and off site), Youth support and development projects, Adult education, career advice and counselling, good quality local training providers etc
  - Local Business support: Local supply chain, Local purchasing, retail support, access to finance, technology transfer, Enterprise Centre(s) and small business support/incubators
  - Job Search/Clubs/Information: to local people and equal opportunities to BME's and others.
  - Childcare provision
- Delivery of this Strategy and other elements of the regeneration could be through a Community Development Trust or a Community Land Trust

Accordingly KXRLG would like to see the following revisions/action: -

- Office jobs provided within the scheme reduced to an overall 17,000 jobs within the development
- A range of small, medium and large business units including affordable premises for small scale and start up units, social enterprises, local charitable, voluntary and community based organisations.
- A 15% target of jobs for local people delivered through a broadly based mechanism which is legal, accountable and has enforcement powers
- An Employment and Training Strategy along the lines set out, planned, managed 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

## C.8 TRANSPORT

### C.8.1 Background: Strategic and Local Planning Policies

One of the objectives of the London Plan is to secure a closer integration of transport and spatial development. This is taken forward through policy to improve public transport capacity and accessibility at areas of greatest demand, and to support high trip generating development only at locations with both high levels of public transport accessibility and capacity..."

Camden council's policies include a requirement that development proposals provide high levels of accessibility, facilities and safety for pedestrians, cyclists and people with disabilities; and to encourage development proposals where proposed car usage and car parking provision is at minimum levels necessary..."

The Transport Assessment is prepared by Ove Arup as a supporting document to the ASG planning application. The KXRLG have the following comments:

### C.8.2 Transport Assessment: Errors

- Typographical errors include mis-spelt street names can make the report difficult to follow
- Some of the graphs are ambiguous and again had the document been proof read it would be a lot easier to follow
- More seriously, present transport provision has variously been understated and overstated. The rail service to North Woolwich is understated (para. 3.2.6), as is the capacity of bus route 10 and the current frequency of bus route 73. Conversely, the capacity of buses on route 274 is overstated.
- A temporary diversion to route 17 is also represented as a long-term capacity constraint.
- It is not possible to relate the capacity tables in chapter 11 to the Dispersal Study figures published in 1995, even though both are projections for the same year, 2011.
- The effect of these errors is to understate the present level of bus service on routes which actually serve King's Cross and to over-state provision nearby. The routes described as coming nearby are the 274 (wrongly stated as double-deck) and routes 31, 153 and 394 whose links with King's Cross are tenuous. Routes like the 24, 29, 253, 168, 134 and 27 could all be said to bring people nearer to the development site. The understating of the service to North Woolwich may be anticipating a future reduction in service not yet agreed.
- The point about the Dispersal study is that the numbers of people changing trains or modes are critical to the capacity of the station, as well as the capacity of the trains themselves.

### C.8.3 What the Transport Assessment reveals

Although designed to downplay the need for public transport improvements, the report does identify pressure on York Way and Pentonville Road.

- **York Way:** given this concern, and the proposal to develop the triangle site to a high density, it is surprising that the Assessment suggests that route 390, the only bus to serve York Way, be diverted into the development site. We have already indicated a preference for terminating routes rather than an attempt to run routes through the site. There can be no question of losing the only route from York Way.
- **Pentonville Road:** The report suggests that present provision will be inadequate and there need to be yet more buses on Pentonville Road. The trouble is that there is already a bottleneck at the bottom of Pentonville Road because King's Cross Bridge is too short to accommodate all the buses that need it - and that is before Bendy Buses make it much worse. The road layout is being altered to try to accommodate Bendy buses, making it even more difficult to cross the road from Thameslink station and despite the fact that Camden is supposed to be committed to improving pedestrian provision at this point. The outcome may be renewed pressure to close the extremely useful bus lane in Pentonville Road, before the ASG development even starts. The long-term solution is another rail link - CrossRail 2 (né Hackney-Chelsea line). We need in the shorter term to find an acceptable road lay-out, and one which incorporates two-way working on York Way.

#### **C.8.4 Impact of an additional 32,500 new jobs on the local and strategic transport networks**

The main purpose of the Transport Assessment seems to be to seek to convince readers that the King's Cross Central development can be created without the need for any enhancements of the transport system such as Phase 11 of the LUL works, improvements to King's Cross Mainline station, Thameslink 2000 and possibly the East London Line extension, the Chelsea-Hackney Line, and the Cross River Transit (tramway scheme). Two or three of these schemes may well not be in place even by completion of the King's Cross Central development. At the very least the developers themselves recognise the importance of completion/operation of the KX Western Concourse/LUL Northern Ticket Hall to the viability of their scheme.

The level of daily commuting needs to be confirmed, but on top of the coming into operation of the future CTRL St Pancras/King's Cross (being described as equivalent to Heathrow Terminal 1), the KXRLG Working Group is clear that much of the existing tube and highway network has a finite capacity which has already reached saturation point. Major developments should not be allowed to take place in areas where the transport infrastructure to support them is not in place before the developments begin. This is of most concern in the north of the site but tube and train capacity in the south of the site will very quickly be unable to support the level of use required, to the detriment of existing and new communities, visitors, workers etc. It is partly for these reasons that the Group has proposed a reduction to 17,000 in employment generated by new development on the Railway Lands.

The idea that everywhere is within ten minutes walking time of the Northern ticket hall (planned as LUL works, phase II) needs to be addressed. Euston Road is the main focal point and the centre of gravity. Walking distances should be measured from there. Where it exceeds 10 minutes, the plans will require improved internal public transport in place before completion.

KXRLG has considered how this transport need should be met. The Working Group considers that existing through bus routes should retain their current routeing. Buses terminating at King's Cross - routes 10, 45, 63 and 259 - could be extended through the railway lands to a terminus at the northern end. A space should be found in the Linear Land for a bus turning and resting point. Together with routes 274 and 390, they would provide links with the west end, and to the north-east, north, north-west and south-east. Further enhancement could be achieved with an extension southwards of route 31 (without which it has no right to be included in ASG's assessment). This proposal has the added merit of removing parked buses from York Way, thereby facilitating its return to two-way working, and from the residential Swinton Street.

If the Cross River Transit tram link ever happens, or a guided bus route, the Working Group considers it should run around the perimeter of the development site on main roads which are already difficult to cross, rather than further compromising the new pedestrian environment. There is very strong support for the backing given in the Planning Brief for the routeing of this tram link along Euston Road rather than through Somers Town.

### **C.8.5 Proposed Transport Network**

Parameter Plan KXC 007 indicates a network of new walking, cycle and vehicular routes in a hierarchy of Primary, Secondary and Tertiary routes. These are in addition to the realigned Goodway and Pancras Road, and Camley Street, Wharf Road and the realigned York Way

- **Vehicular Movements**

Primary Route: Together with the existing roads this new Route comprises the primary distributor for vehicles within the site. It runs from the Southern Hub to a junction with the new access road into the Islington Triangle, via the proposed Southern Boulevard, Granary Square, Transit Street, Holder Street (between Zones P and N) and Canal Street (over new Thameslink tunnel). The carriageway 3.5 and 7.3m wide can handle cars, service vehicles, and articulated buses. It will have controlled parking and controlled pedestrian crossings. The boulevard will nevertheless be substantially pedestrian in nature.

Secondary Routes: These comprise 7.5m wide secondary distributors (e.g. non-articulated buses) principally within the main residential areas north of the Canal e.g. Goods Street – an extension of Copenhagen Street running westwards deep into the site across Market Square. Generous limits of deviation are allowed within the Development Specification as to where these can eventually be routed in detail.

Tertiary Routes: These are for access and drop off only (e.g. to Basement areas) and their surface treatment e.g. sealed gravel, reflects this lowest order of service. They are shown crossing Zones A and B and similarly crossing Zones S, R and Q, alongside the Long Park etc. i.e. they further sub divide the Zones. There are very considerable limits of deviation as to the eventual detailed siting of these routes and it is conceivable that in some instances they could in part be decked over by development above.

- **Pedestrian / Cycle movements**

There is only one through Cycle Route, which is an already existing route, East-West along the Canal towpath. It is felt that the canal towpath is wide enough as it is. A number of limited cycle routes are illustrated both north and south of the canal but no coherent segregated pedestrian/cycle network, or route is proposed North-South through the site. In addition to the new bridge over the canal to accommodate the Primary Route connection from the southern boulevard to Granary Square, two new pedestrian bridges are proposed over the Canal. One immediately to the east of the Fish and Coal Offices and one close to the existing Visitor Centre in Camley Street Natural Park

- **Canal**

Appears to play no part in the Transport strategy informing movement within and across the site. KXRLG considers that the canal is a perfectly serviceable historic transport structure and should be used to transport materials to, and waste and recyclable materials from, the area during the development period.

### **C.8.6 Car Parking on the site**

In addition to controlled parking along the Primary Route and basement parking, a multi storey Car Park is proposed at the southern (canal) end of Zone T. "With no HGV parking it is considered that the site could readily accommodate 1800 cars."

KXRLG Working Group and Members have expressed very strong concerns at the amount of car parking on site – noting also the CTRL car park on Pancras Road. Allied to this are grave concerns about the extent and degree of vehicular penetration and movement throughout the site e.g. the very siting of the multi storey car park in Zone T requires car movements along the proposed Canal Street, Goods Street, Holder Street etc. All of this, both north and south of the Canal will give rise to unnecessary vehicular/pedestrian/cyclist conflict, exhaust pollution, and an environment that could and should be far more pedestrian friendly. Potential conflict areas abound throughout the scheme eg Goods Street and Market Square, Canal Square, within the southern boulevard. The proposed pedestrian/cycle network is seriously inadequate. The development therefore appears to be in contravention of the Camden policies outlined above

As has already been noted, many KXRLG Members are opposed to the proposed realignment of Pancras Road and equal concerns have been raised at the proposed extension of Copenhagen Street across York Way into the site as Goods Street. A majority of the Working Group favour an off-set of any road leading out of the Railway

Lands, so that it does not directly face Copenhagen Street. A median strip in York Way was felt to be too restrictive. There is support in principle for a realignment of Goods Way to facilitate movement into Wharfdale Road, thereby relieving Copenhagen Street of traffic.

### C.8.7 Public Transport (Bus) Proposals

- diverting 390 into development site – KXRLG find this unacceptable for reasons set out above
- bringing the 31 into the site - KXRLG support this see above
- extending the 394 into the site - possibly, if the problems of Pentonville Road can be resolved, although some Islington residents believe there is a greater need for this route to go to Russell Square.
- bringing the 153 closer to the site - it is unclear how this could happen without disturbing existing links which no other route provides.
- extending the 10 beyond the site to Tufnell Park or Finsbury Park - KXRLG support taking it into the site – see above.

### C.8.8 Strategic Connections to the North and North-East

No new station is proposed on the North London Line at Maiden Lane nor is the existing York Road tube station to be reopened.

Although connections via proposed Canal Street, and the proposed North Square and northern boulevard (Long Park and Market Square), will add considerably to connections from and to areas to the north east of the site, it is not proposed to complete the built development either side of the realigned section of York Way until the final phases of the development programme. This could result in a particularly unattractive environment on the realigned York Way between and below the North London Line and CTRL bridges.

- **Maiden Lane station:**

As stated in our response to the local authorities' planning brief, the Group would welcome a proposal to reinstate a station on the North London Line at Maiden Lane but only if existing rail and tube stations on the Caledonian Road remained open.

- **York Road station:**

The Group would welcome a proposal to reopen the York Road station on the Piccadilly Line provided that 1) existing tube and rail stations on Caledonian Road remained open and 2) it did not unduly compromise the level of service currently offered on the Piccadilly Line. We welcome the recent proposal by LUL / PPP concessionaire to conduct a feasibility study into the reopening of York Road station on the Piccadilly Line.

KXRLG Members are concerned that the lowering of York Way to ground level without any new residential development on either side (eyes on street) for possibly 10-15 years could present as unpleasant and even more dangerous environment for pedestrians as

the present viaduct. They would want to see this situation improved either by bringing forward development of this area earlier in the Development Programme and/or by good lighting, security cameras and possibly temporary greening and public art (illuminations) of the area and the underside of new bridgeworks and other structures.

### **C.8.9 Strategic Connections to the North-West**

No new connections are achieved from the northern end of Camley Street to Agar Grove and Camden Square

KXRLG Members have expressed the following views: -

#### Access to and from the north and northwest

Because there has been no attention to this over the past 25 years by Government, Council or the various rail authorities, the site is isolated to the north by a crescent of dead land and the double barriers of the North London Line and the new Eurostar tracks. Both these are at high level and have no holes in their embankments to the North.

Possible links are:

1a. Central Bridge. The ideal solution would be a wide, secure, attractive pedestrian and cycle bridge, spanning from the Maiden Lane estate in the north to descend, on a long ramp, south of the new tracks. Agreed this would be expensive but it could form an extremely valuable gateway into the site from the North - high views down and over the tracks!

1b. Maiden Lane Station. If a new Maiden Lane station were built on the North London Line a pedestrian bridge could be provided over both tracks. This would have the added advantage of providing access to the North of the site from a major transport route. If there were to be central North/South tram or surface transport system it could terminate at this new station. (see KXRLG comments under Transport Assessment)

1c. Western Pathway. To the North West a clear and pleasant route for cycles and pedestrians could be constructed down onto the dead end of Camley Street, at the side of the Agar Grove Estate, along the Site 7 Industrial Estate (would need to be made more pleasant) and down onto the north canal towpath. This would make the proposed bridge over the Nature Reserve unnecessary. Estate privacy and security would have to be ensured.

### **C.8.10 Strategic Connections to the West (Somers Town)**

The proposed new pedestrian/cycle bridge over the canal and through the northern end of Camley Street Park will connect via Camley Street under the new CTRL/existing Midland Main line bridge into the footpath system across Pancras Gardens and pedestrian crossing at the entrance to Gardens across Pancras Road into Somers Town

KXRLG Members are very concerned at this proposal: -

The proposed new footbridge across the canal at Camley Street Natural Park (CSNP) would result in the loss of 10% of the area of the park. It would also:

- Create security problems for the park and the St Pancras Cruising Club

- encourage destructive overcrowding in a place "... not considered suitable for use as a local park"
- Create a haven for criminal activity in a very quiet section of Camley Street where few people have reason to go especially at night
- Cause light pollution which would adversely affect the breeding cycle of birds in CSNP.
- lead to a deserted and barely used street far from the main areas of population
- prejudice the security of Camley Street Natural Park and St Pancras Cruising Club
- Be designing crime in
- Provide too much opportunity for bicycles to enter St Pancras Gardens
- Cause too much disturbance to the wildlife in Camley Street Natural Park

Camley Street Natural Park will not be enhanced by the construction of a footbridge through, over or inside it, so the footbridge should not be built.

A perfectly serviceable bridge exists a few yards to the north where Camley Street itself crosses the canal. Access to the towpath could be enhanced at this bridge by the provision of a wide ramp for bicycles, wheelchairs and prams and by widening the steps.

Access from Somers Town is more logical across one of the two bridges in the south than it is via the proposed footbridge. Access from St Pancras would be safer, quicker and more logical.

#### **C.8.11 Strategic Connections to the East**

The proposals in the vicinity of "Randell's Junction" appear to be entirely unsatisfactory and could be much improved to invite pedestrian/cycle movement into and out of the site

The east-west tertiary route proposed south of the canal could eventually directly connect with the pedestrian bridge over the track inside King's Cross Station. All that would be required then to complete the connection would be an extension of this pedestrian bridge over York Way into the current P and O development site

Accordingly KXRLG would wish to see the following revisions/action:

- 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 for travel placed upon it by the new development
- Consideration, and if appropriate, incorporation of recommendations set out above, for bus services and routing through and around the new development
- Substantial reduction in parking provided on the site.
- If a multi storey car park is still required, its relocation to a position which does not necessitate such deep vehicular penetration into the site

- Substantial increase in provision for safe pedestrian and cycle movement within the site and to the surrounding areas
- Limited and sensitive improvements to the canal towpath particularly in the vicinity of Camley Street Natural Park
- Provision of a safe pedestrian /cycle only route north-south through the site
- No new pedestrian/cycle bridge as currently proposed at Camley Street Natural Park
- Retention of existing alignment of Pancras Road in the vicinity of Stanley Buildings
- Revision of proposals for Goods Way-Copenhagen Street junction
- Consideration, and if appropriate, incorporation of suggestions for improved connections between the site and the north west and to the east

## **C.8 ENVIRONMENT**

The KXRLG Working Group has thoroughly reviewed the developers Environmental Statement and associated documents and their views are as follows: -

### **C.8.1 EMAS and ISO Standards**

EMAS is the Eco-Management and Audit Scheme established by European Regulation in 1993 and subsequently replaced by Council Regulation 761 in 2001 (EMAS2): it is a voluntary initiative designed to improve companies' environmental performance. The International standard for Environmental Management Systems is ISO 14001 which was first adopted in September 1996.

Neither Argent St George, London and Continental Railways, Exel nor the company who prepared the Environmental Statement, RPS Group, are on the list of companies registered for EMAS2 certification. Furthermore, there is no mention on those companies' websites of being certificated for ISO 14001. Although it is not a legal requirement for companies preparing Environmental Statements to be registered or certificated on one or other of these schemes, the fact that they are not undermines their credibility.

It is stated on p. ix of the Implementation of the Environmental Sustainability Strategy that the Environmental Management System of the site would be modelled on ISO 14001 but no guarantee is given that the model would be an exact fit with the standard, and leaves the developers open to charges of cherry picking in which they only choose those parts of the standard they wish to apply.

Environmental performance should be measured against agreed International Standards.

Accordingly KXRLG would wish to see the following action: -

- If the applicants are going to use ISO 14001 they should make a firm commitment to the whole standard and to the certification scheme. These comments also apply to the Environmental Statement.
- The companies involved in the development at King's Cross Opportunity Area should be registered under EMAS2 and / or certified under ISO 14001. Under these circumstances the local communities could be much more confident that 'significant' impacts were being effectively addressed.

### **C.8.1 Ecological objectives of the London Plan**

1.2.25 of Environmental Statement states, "The London Plan recognises that in such a highly urbanised quarter, environmental quality is crucial..."

KXRLG considers that this includes the present biomass in the derelict land and this

must be conserved or a situation created where its replacement can develop.

1.2.26 [Camden] "... Council seeks development at King's Cross that achieves a successful balance of the protection of the historic environment: the enhancement of the canal's biodiversity; access to and along the canal for pedestrians; the use of the canal for recreation; and the use of the canal for transportation, especially during the construction of development..."

- The canal should be used for transportation during the construction process, both for removal of waste and for delivery of materials.
- 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 the Camley Street Natural Park should also be conserved and enhanced if possible by extending the park into the available space.

1.2.29 "The London Plan sets out the need for developments to embrace sustainable design and construction, including the need for applications to be accompanied by statements showing how sustainability principles will be met..."

These are dealt with in the Applicants Environmental Sustainability Strategy and Code of Construction Practice which set out the ways these objectives are planned to be met.

- Both documents, once amended in the light of the Consultation process, should become part of the application itself and the fulfilling of the practices contained in them should be a condition of planning consent with monitoring procedures in place before consent is granted.

1.2.30 "An important element is to design in future flexibility within the master plan and design, so that decisions made today [about energy efficiency, water management, waste management and recycling measures] do not prejudice future options as technologies mature..."

- A firm commitment should be put in place from the developer to use those 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).

## **C.8.2 Approach to the Environmental Impact Assessment**

1.3.38 of EIA states, "The purpose of EIA is to identify and mitigate the 'likely significant effects', not every conceivable effect, however minor or unlikely, of a major project."

1.3.40 of EIA states, "There is no universally recognised definition of what constitutes 'significant'. This differs according to the perspective of the stakeholder(s) and the topic under assessment. It is good practice to identify the degree of significance or

importance.”

(see KXRLG required action under EMAS above)

1.3.45 of EIA states, “An iterative approach has been adopted towards the design of the scheme, which has evolved alongside the EIA process.”

The EIA process should continue to be iterative over the whole timescale of the development with interested parties in the local community involved in reviews of the significance of possible effects, the monitoring of mitigating strategies, and the levels of performance. Using the amended Environmental Statement, Environmental Sustainability Strategy and Code of Construction Practice documents as planning documents specifically to address environmental issues, the continuing EIA process should be implemented and operated, checked and corrected, reviewed and continually improved incorporating new environmental and sustainability policies as they emerge.

### **C.8.3 Development Proposals: Islington Triangle**

The EIA states, “A central amenity space between the three ‘blocks’ at the Islington Triangle would be provided as part of the development, for the use of residents and users of the health and fitness and related facilities...”

- Proposed “Amenity space” between the 3 blocks in the Islington Triangle should be Public Realm.

The EIA states, “The far corner of the site, up to the point where the rail lines converge, would be retained as habitat area...”

- This should be the northern focus and final destination of a wildlife corridor from south to north through the site.

### **C.8.4 Development Proposals: Main Site**

These are included principally under Public Realm and Housing above.

### **C.8.5 Mitigation Strategy**

The EIA states, 3.3.4 “... Only those measures to which there is a clear commitment have been taken into account in the assessment of effects.”

This is one of the reasons that the EIA process should be iterative over the whole timescale of the development. In this way, clear commitments made by the applicants at later stages in the process can be addressed for their impacts on the environment and the adequacy of mitigation measures can be judged and negotiated if necessary.

### **C.8.6 Environmental Effects at the Construction Stage**

These are included in section C.10 Construction Issues, later

## **Environmental Effects at the Operational Stage**

### **C.8.7 Cultural Heritage and Townscape**

(see section C2 Urban Design and Density and section C.4 Conservation and Heritage above)

### **C.8.8 Visual impact**

(see also section C2 Urban Design and Density and section C.4 Conservation and Heritage above)

5.1.6 "The assessment of visual impact has focused on changes to views identified in scoping as important i.e. strategic views, views from Conservation Areas and (existing and proposed) local views of landmarks. No assessment has been made of the wider visual impact of the proposals on the basis that (in a dense built up area) the development would not give rise to significant effects beyond the immediate surroundings of the site."

The proposed heights of buildings in King's Cross Central far exceed those of the vast majority of those in the surrounding areas. Impact on views in the wider area should be considered.

### **C.8.9 Character of the area**

(see also section C.2 Urban Design and Density and section C.4 Conservation and Heritage above)

5.1.13 "... For King's Cross Central the character of the area has already been changed substantially by the CTRL works and further change will take place before 2006/7."

5.1.14 "It is inevitable that the character and appearance of the area would then experience further changes as a result of redevelopment..."

### **C.8.10 Building Groups**

(see also section C.2 Urban Design and Density and section C.4 Conservation and Heritage above)

5.1.31 "... South of the canal the context of the surviving buildings has been substantially degraded by the recent activities of the CTRL but salvaged materials await opportunities for reinstatement."

### **C.8.11 Trees and Vegetation**

A Department of the Environment (DOE) survey, 'Trees in Towns: a survey of trees in 66 Towns and villages in England' prepared by Land Use Consultants and published by HMSO in 1994 states:

“... in High Density Housing Areas, trees can play a major role in improving the quality of the environment. It is essential however, that community involvement and commitment is engaged from the outset and that tree planting, landscaping and external improvements are incorporated, wherever possible, in a package of social and economic improvements so that action is not seen as merely cosmetic. Otherwise great resentment and frustration can be caused. Close consultation with local communities over tree planting and management is vital ...”

The survey gives the figure for tree densities in towns in the South East as 47 per hectare (5.7, p. 18) and a table on p. 30 shows an overall increase of tree numbers from the late 1960's to the early 1990's of 4%.

Large development sites offer great opportunities for reinforcing the local distinctiveness of tree cover and creating lasting landscapes of quality.

- 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 Kings Cross Central (ie total 1278) with an aspiration for a higher figure to set a standard for increasing the numbers of trees in new urban developments.
- The trees already on site should remain undisturbed where possible and replaced within the site only when no other alternative is available. The trees in Camley Street Natural Park, along the canal frontage and in the area of St Pancras Cruising Club should remain undisturbed.

5.1.54 “... The existing maintenance regime appears sparse and therefore poor quality specimens that are displaying signs of environmental stress may deteriorate further by 2006/7.”

- The council should undertake a conservation programme for these trees at the earliest opportunity. If any of them do not respond they should be replaced by the developer and a maintenance programme put into place.

### **C.8.12 Buildings and Spaces / Contribution to the Conservation Area**

(see our comments and required Revisions / Action under Sections C.4 Conservation / Heritage)

### **C.8.13 Use of CTRL salvaged materials**

5.1.86: “The CTRL project has required that various parts of heritage buildings, structures and surfaces be removed to make way for the permanent works. It has been a requirement of the project that materials arising from the demolitions be salvaged for reuse within the CTRL works or, where this is not appropriate, made available for reuse by others ...”

This does not appear to be the case with the current proposals for St Pancras Chambers.

- 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.
- The more salvaged materials that could be re-used the better, especially in conjunction with interpretative signs and plaques.

#### **C.8.14 Sensitivity to the Proposed Changes**

(see comments and required Revisions / Action under Sections 2 , 3 and 4 above)

5.1.10: "At King's Cross Central the largely 'unused' nature of the land in the baseline year means that the area is not sensitive to change in the conventional sense ... (in the past the large areas of railway land and the gasworks have created barriers to movement).

5.1.101 "Within the site the character and appearance of Listed buildings and Conservation Areas are potentially more sensitive to change in general terms but their actual sensitivity would depend on the nature of the proposed development including the public realm."

#### **C.8.15 Assessment of Heritage and Townscape Effects**

(see comments and required Revisions / Action under Sections 2 , 3 and 4 above)

Difference in Effects without the Triangle Site Development

5.1.111 "Should the Triangle development not proceed ... the 'gateway' to the site would be weakened by the lack of definition to the east."

#### **C.8.16 Southern Character Area (Sub Areas 1,2 and 3): Summary of Effects**

(see comments and required Revisions / Action under Sections 2 , 3 and 4 above)

The overall assessment (without King's Cross Station Enhancement) as 'Low to Moderate' sensitivity to change with a 'Permanent Beneficial' effect and 'minor' significance is a serious set of miscalculations in regard to the group of Victorian structures and takes no account of local sensitivities in this matter. The same is true of the overall assessment (with KXSE) which they at least attach some 'moderate' significance to. There is no difference in the significance whether the KCSE is completed or not. The true sensitivity to change in both cases is a 'major' permanent adverse effect with 'major' significance.

#### **C.8.17 Regent's Canal Corridor (sub Areas 4 and 5): Summary of Effects**

(see comments and required Revisions / Action under Sections 2 , 3 and 4 above)

**C.8.18 Effects on Central Character Area : Granary Square (Sub Area 6)**

(see comments and required Revisions / Action under Sections 2 , 3 and 4 above)

**C.8.19 Effects on Northern Character Area : Market Square / Long Park (Sub Areas 7 and 8)**

(see comments and required Revisions / Action under Sections 2 , 3 and 4 above)

WE ARE CONSIDERING PUTTING FORWARD ALTERNATIVE DESIGNS FOR GENUINE SAFE AND ATTRACTIVE PUBLIC OPEN SPACE INCLUDING A 1HA PARK, NORTH AND SOUTH OF THE CANAL, IDEALLY IN CONJUNCTION WITH OTHER LOCAL ORGANISATIONS AND INDIVIDUALS IN THE AREA.

**C.8.20 Opportunities for Further Mitigation Measures**

5.1.151 "Further heritage mitigation could be provided through the publication of the site history and illustrative information about the construction process. This material could be presented in the form of a small permanent or temporary exhibition. Interpretative material could also be located on signs and plaques at viewpoints and places of interest..."

The publication of the site history would be welcome as would signs and plaques with interpretative information. This exhibition could provide the focus in the north for the site (at Sub Area U) and a possible item for inclusion in uses canvassed for the German Gym or the Great Northern Hotel. With the inclusion of one of the reclaimed features of the Western Goods Shed for example on the side facing York Way, it could provide a gateway feature that would be prestigious, heritage centred and acknowledging the site's history, and a link with the Goods Yard Complex surrounding Granary Square and the connected group of Victorian structures in the south.

- The exhibition should be permanent.

5.1.153 "Further mitigation of effects on views of landmarks could be achieved through the provision of public viewing opportunities in some of the taller buildings, though this is likely to depend on security and other matters ... Other opportunities for enhancement include a co-ordinated approach to floodlighting of key buildings ... and greater re-use of salvaged materials in appropriate locations."

Security matters will almost certainly preclude public viewing platforms on the taller buildings and greater mitigation of the effects on views of landmarks could be achieved through stepping back the frontages at lower levels (which would also reduce canyon effects and provide more space for green roofs).

Floodlighting would create more light pollution effects with negative effects on wildlife which would have to be encouraged to negate the sterile look and feel and the hard edges of the proposals.

## **C.10 CONSTRUCTION ISSUES**

### **C.10.1 Code of Construction Practice**

The Code of Construction Practice submitted, as a Supporting Document is inadequate. A proper regime requires much more than a COCP and should include:

- Assessment of impacts;
- A full Environmental Statement (ES)
- Prior control of construction arrangements
- Enforcement of construction conditions
- Consultation and involvement of community: residents, the developer, and the Council all meet as equal partners and jointly develop working methods in a way that benefits all parties.
- Complaints procedure

Accordingly KXRLG require the following revisions / action:

- 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
- The revised Regime should be part of the planning application rather than a supporting document.
- A formal process for Liaison / Consultation with local communities to be agreed before planning permission is granted and put in place before construction is begun.

### **Environmental Impacts during the Construction Process**

#### **C.10.2 Monitoring**

4.2.7 of Environmental Statement (ES) states, "... emissions to air, discharges into water and disposal of waste produced by the project, would all be subject to controls under legislation dealing with environmental protection and it may be assumed that those controls would be implemented competently by the responsible authority."

- The Applicants should make a commitment to assisting the responsible authorities in their implementation of these controls by allowing access and installation of monitoring equipment.

4.2.9 of ES states, "The criteria used to define the significance of the effects, both adverse and beneficial are:- Major: effects of the development of greater than local scale[;] Moderate: effects of the development that may be judged to be important at a

local scale (i.e. in the local planning context)[;] Minor: effects that are of low importance in the decision making process.”

This arrangement of criteria excludes the possibility that major effects can happen at a local scale and it is therefore unsatisfactory. Major impacts can take place at a local scale in both intensity in the short term, and the length of time that negative effects can have on the land, the biodiversity, and the water features such as the canal and the pond in Camley Street Natural Park, and according to the number of people they affect. It would not be responsible to refer to effects of these kinds as ‘moderate’. Under these circumstances and given the lack of certification or registration, local confidence in the Assessment process would be much improved if:

- The future decision making process should include Local Agenda 21 core groups and other sectors of the local communities concerned with sustainability and environmental matters including those groups represented on the King's Cross Development Forum.

### **C.10.3 Consultation**

4.3.2 of ES states, “The Applicants have also taken an active interest in how current construction projects are being managed in the King's Cross area, and has attended meetings of the London Borough of Camden's Construction Impacts Group. The monitoring of complaints from current construction processes by this Construction Impacts Group has provided an insight into the concerns of local residents.”

We wonder whether the insights are into the natures of the complaints, or simply into the numbers. Until very recently (August 2004) very few local people, if any, including those who most closely follow the planning process in Camden and Islington, were aware that this Construction Impacts Group existed. Local people have been extremely dissatisfied with complaints procedures such as the ‘hotline’ run by the CTRL project and many gave up on it because they were not convinced that their complaints were being taken seriously or even heard. The situation became so serious that one planning application submitted by CTRL was heard at a public enquiry especially convened by the Planning Inspectorate for the purpose.

We hope that the applicants took an active interest in the regular tri-partite meetings between CTRL management, the Environment Department of the London Borough of Camden and local residents and has plans to explore the possibility of setting up a similar arrangement when the King's Cross Central project begins. (see Implementation below)

4.3.4 of ES states, “... Also, mitigation measures should include an environmental management system and detailed environmental management plans to facilitate sound management of any environmental issues arising from construction.”

- The environmental management system should meet the required standards under EMAS2.

4.6.9 "The volume of spoil to be removed from site within any 12 month period is predicted, as 'worst case' to be 270,000 m<sup>3</sup>. This is based on two consecutive years of the highest volume being carried out in one year. The removal of 270,000 m<sup>3</sup> represents, therefore, the highest possible intensity of earthworks operations."

The volume of spoil to be removed from site within any 12 month period would almost certainly not take place at a constant rate throughout any one year - there would be peaks and troughs in the work process with corresponding peaks and troughs in the number of transport movements.

The worst case scenario presented here is the long term. The assumption has to be made therefore that predictions based on 'worst case' over one year are unlikely to be accurate when considering effects over the shorter time periods when intensities of activity are likely to be higher.

- Worst case scenarios should be provided over shorter time periods such as one quarter, one month and even one week.

#### **C.10.4 Transport / Vehicle movements**

##### 4.7.14 – 19 of ES

At no point in the material provided on assumptions made to assess environmental impacts is the possibility of transport by canal mentioned although it is specifically called for as the last bullet point in 2.3.9 of the Planning & Development Brief.

The worst case for the number of trucks associated with removal of excess material in any one year is given at paragraph 4.6.41 of the Environmental Statement as 31,500, and the worst case number of lorry movements associated with delivery of construction materials and plant in any one year is given in paragraph 4.6.43 as 73,000 trucks. Approximately 85% of trucks are assumed to be HGV's, and at 4.6.44 the assumption is given that 10% of 3,000 construction employees will travel to work by road. This is 104,800 extra vehicle movements in the Kings Cross area if there are any delays in years one to three when two worst case scenarios would overlap and these, even using the applicants' own criteria, would have be a "Major effect of the development of greater than local scale".

The figure of up to 31,500 vehicle movements in each of the years one to three and up to 10,000 vehicles per annum in subsequent years (which could easily number 16) associated with removal of excess material off site does not square with the applicants' intentions to use much of the spoil to level the site and to recycle masonry etc. as hardcore and foundation materials.

- Mitigation measures must be extensively explored and all possible measures taken to reduce this major impact.
- The canal and rail network should be used where possible for the transport of materials to be recycled.

If they are not then the potential for delays, accidents, and environmental deterioration in York Way, Seven Sisters Road, Pentonville Road and Euston Road as well as roads

which feed in to these such as Pancras Road and Grays Inn Road will become enormous.

### **Assessment of Effects**

4.7.25 "The peak level of activity would therefore generate some 340 vehicle movements in each direction during a typical weekday, and 35 vehicle movements in a typical hour. This level of hourly construction traffic represents a very small percentage of typical hourly traffic flows surrounding the site and would not significantly affect highway capacity."

The figure of 35 vehicle movements in a typical hour means that there will be more than one vehicle movement every two minutes: this is not 'worst case' but 'typical'.

- All steps should be taken to reduce that figure because it, in itself, is an impact.

4.7.26 "... Given the proximity of the site to mainline and LUL stations, it is envisaged that the vast majority of construction personnel would travel to the site by public transport or on foot or cycle."

The local rail infrastructure is already very close to capacity and, coupled with the tortuous nature of entrances and exits to King's Cross underground station, which are expected to continue in their present state for some time, the high number of construction personnel will inevitably have a considerable impact on the local public transport provision and convenience.

### **C.10.5 Socio-Economic**

4.7.31 of ES states, "... there is no other major construction activity proposed for the area post 2006/7..."

Subject to planning and funding approval, construction of the Northern Ticket Hall for King's Cross Underground Station and the Western Extension of King's Cross Mainline Station will go ahead. (indeed the applicants are relying on this going ahead).

4.7.32 of ES states, "... There are few residents in the Central Impact Zone and Wider Impact Zone currently employed in the construction industry, although recent attempts have been made to increase the proportion on CTRL, Regent's Quarter and station developments. If successful, these schemes would be finishing around the time of construction beginning on King's Cross Central possibly resulting in the transfer of local, trained labour..."

- Strong efforts should be made to train more local people in the construction trades and prepare them for employment at King's Cross Central, as this would reduce pressure on the public transport network, especially trains both below and above ground.

4.7.34 of ES states, "... it is estimated that around 5% of the total workforce would be sourced from within the Central Impact Zone and 25% would be sourced from the Wider Impact Zone ."

These are encouraging figures to see and will have demonstrable Health benefits too. An aspiration to increase them as much as possible would be welcome.

- These targets should inform the Employment and Training Strategy referred to in 6 above.

4.7.38 of ES states, "... the completion of the Channel Tunnel Rail Link is likely to reduce the attractiveness of the area for certain types of criminal activity (drug dealing and prostitutes in particular). It is difficult to quantify the extent of this effect but a reduction in criminal activity is expected..."

This is highly debatable as there may be increased supply and demand from Europe and Kent. The erection of a footbridge across the canal into Camley Street would create a haven for exactly those kinds of crime because of the quiet nature of that part of Camley Street at night.

The expected reduction in criminal activity would be greater, the greater the number of local people employed on the site and subsequently living on the Main Site, who could provide eyes on the street and enhance community safety.

4.7.47 "It is likely that the progressive provision of a range of social and community activities and facilities proposed in the development would have positive health effects, be it directly through social capital, or indirectly through reinforcement of positive effects on other determinants of health (such as crime and education). The significance of these effects is considered to be minor beneficial."

Clearly the authors of the EIA are unaware of how very little "social capital" the applicants are actually proposing! The more provided, the more beneficial the health and other effects would be.

- The applicants should aim for a major beneficial socio – economic outcome

### **C.10.6 Road Traffic accidents**

4.7.56 "Where practicable, existing public access routes and rights of way would be maintained and properly signposted during construction ..."

- This should include eye level signing for wheelchair users and aural signals at pedestrian crossings for the partially sighted to be audible above the noise of construction work and construction (HGV) traffic.

## **.10.7 Nature Conservation**

4.7.65 "The ecological resources that may be sensitive to construction are identified in Table 4.1..."

The ecology that has developed over the years on derelict land is not included in the Table and the effect of construction here is definitely going to be major adverse.

- Provision must be made for the opportunity for a similar amount of biomass to establish itself in the new development through a green corridor of parks, squares, trees, hedgerows and green roofs.

4.7.72 "... significant works ...are likely to include the relocation of the gas governor ... and relocation of dismantled guide frames for the linked triplet of the gasholders ... The other significant element of works in the immediate vicinity would be the construction of bridge BR3 and the footpath/cycleway"

- Ecological damage should be reduced through leaving the gas governor where it is and extending Camley Street Natural Park into the space in Zone V.

4.7.76 "Other than the canal frontage of Camley Street Natural Park, the section of the canal within and adjacent to the King's Cross Central site offers little cover for breeding birds or other species which would be particularly susceptible to disturbance. Thus the effects of such construction disturbance are likely to be largely restricted to the western section of the canal."

KXRLG disagree, there is cover for breeding birds from the southern end of Camley Street Natural Park all the way to the York Way Bridge interrupted only by the existing bridges. This is what makes it ideal for an extension to the park: the trees are already there.

## **C. 10.8 Air Quality and Climate Change**

4.7.146 "At present a register of complaints received about dust is maintained by the King's Cross Construction Impacts Group ... The CTRL help-line received 14 complaints about dust in the area between January and August 2003..."

Regularly updated versions of this register should be publicly accessible. By January 2003 local people had become sceptical about and apathetic towards the CTRL help-line so many did not bother to use it: they felt their complaints would not be responded to. It would be helpful to know how CTRL responded to those 14 complaints. How many complaints did Camden Council receive about the problem during the same period?

### **C.10.9 Opportunities for Further Mitigation Measures**

All further mitigation measures proposed are welcomed but it is stated only that they "... may be considered ..." This is not a firm commitment to use them and one should be made.

### **C.10.10 Noise and Air Quality Monitoring**

4.9.4 / 4.9.7. "The results of any noise / dust monitoring would be made available to the Construction Impacts Group."

The United Kingdom is a signatory to the Aarhus Convention on Participation in Decision-Making and Access to Justice in Environmental Matters agreed in Denmark on 25/6/98. Article 4, Access to Environmental Information addresses the issue. The Freedom of Information Act 2000 addresses the general right of access to information held by public authorities. Paragraph 3 (2) states "For the purposes of this Act, information is held by a public authority if- ... (b) it is held by another person on behalf of the authority.

If monitoring information is not held by the Construction Impacts Group on behalf of the local authority then there is no point in them having it. This information is environmental information (otherwise it would not have been addressed in an Environmental Statement) and, as such, should be made available to the public through the local councils.

Accordingly KXRLG would wish to see the following revisions / actions:

- a commitment to assisting the responsible authorities in their implementation of environmental controls (of emissions to air, discharges to water and disposal of waste) by allowing access and installation of monitoring equipment.
- The future decision making process should include Local Agenda 21 core groups and other sectors of the local communities concerned with sustainability and environmental matters including those groups represented on the King's Cross Development Forum.
- 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

- This should include eye level signing for wheelchair users and aural signals at pedestrian crossings for the partially sighted to be audible above the noise of construction work and construction (HGV) traffic.
- Strong efforts should be made to train more local people in the construction trades and prepare them for employment at King's Cross Central, as this would reduce pressure on the public transport network, especially trains both below and above ground.
- Provision must be made for the opportunity for a similar amount of biomass to establish itself in the new development through a green corridor of parks, squares, trees, hedgerows and green roofs.
- Ecological damage should be reduced through leaving the gas governor where it is and extending Camley Street Natural Park into the space in Zone V.
- Monitoring information should also be available to the general public through the local councils.

## C.11 PHASING AND IMPLEMENTATION

The Applicants do not (and say they cannot) make any commitments to a particular programme of works or sequence of development activity Zone by Zone. Though they are committed to:

- Station Square being finished no later than completion of built development in Zone B
- Southern Boulevard being finished no later than completion of built development in Zone A.
- Market Square and Long Park substantially complete before 1000 residential units are completed within the site.
- Thresholds for delivery of housing, including affordable housing, would be agreed with the Local Planning Authorities as and when Outline planning permission is granted.
- Each major phase of development would contain a mix of uses including market and affordable / low cost housing.

The Implementation Strategy provides illustrations of First Phase, Second Phase and the final Completed Scheme. The developers 'realistic' estimate of how long the whole scheme would take to complete from the first phased release of land in 2007, is 15 – 19 years i.e. between 2022 and 2026.

Subject to the above, it is clear that the Phasing and Implementation of this development is characterised by a number of risks – some conventional ones and some specific to this site.

In the latter category is the future Western Concourse to King's Cross Railway Station and allied construction site. Not only is it important to ensure these works are inter related to and carried out in conjunction with the LUL Northern Ticket Hall (see Transport 7 above) but they need to produce a "high quality solution to the area between the two mainline stations (NB. Station Square proposals contained within the Application are 'transitional'). Much of Zone A is taken up by the associated Construction site for the Western Concourse works and thus a substantial part of the critical Commercial hub south of the canal is sterilised by: -

- Funding and timing of completion of these works;
- Dependent upon completion of these railworks including a new tube / rail access point within the Southern Boulevard (NB. 10 minute walking distance referred to in 7 above) in a manner satisfactory to both Network Rail and the applicants.

Second Phase Implementation Plans indicate that only half of Zone B and none of Zone A is built in this phase. Under these circumstances, the applicants have looked towards the Granary Complex of buildings and the London Institute to give their scheme some much needed marketing and other profile. Thus the First Phase development is almost entirely concentrated on Zones L and K (the "Learning and Knowledge Cluster"). The Development Specification indicates a tight timescale associated with relocating Central St Martin's School of Art into an initial 30,000m<sup>2</sup> of new space in that Complex "open for use 2009."

It is for these reasons that the KXRLG Working Group have expressed "fundamental concerns" (see 1 above) not only about prematurity but viability.

The only element of housing indicated in Phase 1 is Zone R part built and isolated on the York Way frontage. Even by the end of Phase 2, not only is none of Zone A and only half of Zone B built but much of the northern part of the site (much of Zones P, T, S, Q and the Islington Triangle) remain unbuilt as well. It could well be therefore that much land and those buildings that are retained, in both the south of the site and the far north of the site will not realistically be developed until 2017. This places the first two developer commitments in context and it must surely be in everyone's interest to have Station Square and an interesting connection between the southern hub and the Granary completed before 2017!

It is clearly not in the interests of surrounding communities to have a state of dereliction and uncertainty lasting any longer than is absolutely necessary. All are agreed that King's Cross needs regeneration. Two practical ways forward might well be: -

- Temporary uses of land and buildings,
- Changing the development programme.

Accordingly KXRLG would wish to see the following revisions /action: -

- Support inclusion of Housing Triggers within any consent 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 Applicants commitments on Station Square and a major pedestrian connection between the Southern Hub and the Granary Complex.
- Avoid isolation of first phase housing in Zone R as illustrated.
- Bring forward completion of Islington Triangle in the Development Programme.
- Find permanent or temporary uses for buildings and open spaces which are otherwise predictably likely to remain empty / derelict for say 5 years.
- 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 in conjunction with community consultations which should include the King's Cross Development Forum.
- More legible and understandable phasing illustrative plans should be produced.

## C.12 Community Involvement in Regeneration

There is relatively little in the Regeneration Strategy as to how the applicants intend to apply their “commitment to joint working with Central, London – wide and Local Government, service delivery partners and the local community towards optimising regeneration benefits.”

Most KXRLG Members are equally concerned to see minimisation of construction and other (see Phasing above) impacts. Tri – partite working of the kind being developed between Coopers Lane TA, CTRL Contractors and LB Camden appears to many Members to be a sensible approach and one which could have much wider application.

Para 4.4 of the Development Specification for the Main Site refers to a “collective ownership structure envisaged for the development as it progresses. This would allow the ongoing development to be owned and managed as a whole, with the Companies and Organisations involved taking a direct and active role in the future of King’s Cross.”

Paras 5.2 – 5.4 of the Public Realm Strategy put forward options for management of the Public Realm ranging from adoption by the Local Authority, to Private Management, to a Management or Neighbourhood Trust comprising a partnership between LB Camden, Argent St George, Community representatives, and relevant stakeholders. This is the applicants preferred option.

Many Members of KXRLG strongly support adoption of the Public Realm by the respective Local Authorities. On the other hand there is widespread support for the concept of a Community Development Trust / Community Land Trust to ensure direct local involvement in the planning, implementation, management and even delivery of certain aspects of the regeneration. It is worth noting that there already is a Community Development Trust in King’s Cross. One Member has cited the example of Covent Garden where developers agreed to lease land centrally located in the area to a Community Development Trust over a 100 year period, plus 2% return from the central market. This provides the invaluable asset base which all such Trusts need to have.

KXRLG has already expressed in Jobs and Training (Section C.7 above) support for broadly based accountable Community Umbrellas and Forums to be directly involved in the Employment and Training Strategy.

Likewise the Environmental and Construction Sections above has highlighted how the EIA process, in iterative fashion expects to see interested parties in the local community involved in reviews of the significance of possible effects, the monitoring of mitigating strategies, and the levels of performance.

The potential need for temporary uses for example as identified in Phasing above would also suggest the need for Community Umbrellas and Forums to come more directly into the regeneration process. It is in everyone’s interests to see maximum benefit and minimum disbenefit accrue to all stakeholders – not least the surrounding communities - from regeneration of King’s Cross Central.

Accordingly KXRLG would wish to see the following action: -

- 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.