

KINGS CROSS CENTRAL OUTLINE PLANNING APPLICATION

APPLICATION FOR:

XXXXXXXX

FORMAL RESPONSE BY KINGS CROSS DEVELOPMENT FORUM

SUMMARY

In principle the Forum strongly supports the broad vision for regeneration proposed in the application which seeks to ensure that the Kings Cross Central site plays a pivotal role in the revitalization of the kings Cross area and surrounding communities.

To aid both Councils and applicant, the Forum has prepared a joint response on the Outline application. These comments are summarised more fully below. Some comments appear in more than one category reflecting the overlapping impacts and the need to consider all aspects comprehensively. It is made clear where there is strong support across the Forum on an issue, and where there are individual suggestions or debate.

This response is based on the submissions made by the Kings Cross Development Forum at an agreed programme of topic based workshops. Individual organisations of the Forum will submit separate responses on issues specific to their organisations.

PAL NOTE: We have highlighted areas below where there are further questions or explanation for you to provide. This is very much a first draft and we will be doing more work on it over the next week. Please ensure that your amendments, additional comments etc are provided to us no later than Monday 4th Oct. We will be submitting the Final response on the 8th Oct and cannot guarantee to include any further response received after the 4th. Please return your comments by email preferably using Track Changes (see Tools Menu in MS Word) if you can, or by cutting and pasting just the relevant section you are concerned about and sending it to us amended.

Send to info@planningaidforlondon.org.uk FAO 'Kings Cross Response'

HOUSING/ REGENERATION/ COMMUNITY FACILITIES/ BUSINESS, EMPLOYMENT & TRAINING comments to follow

DETAILED RESPONSES

SECTION 1 – CONSERVATION, LAND USE & DESIGN

CONSERVATION AREAS AND BUILDINGS

- In general there is a reluctance to see heritage buildings demolished. Buildings – especially Culross and Stanley North - and natural heritage should be sustained because it would strengthen the area's identity and uniqueness.
- The premise of creating 'cultural' areas needs greater consideration, in order to avoid exclusive 'culture' for some. There is general agreement with culture, events, museums and the heritage heart as long as it also includes the residents (from both on site and surrounding areas)
- A small number expressed the opinion that the gasholders are misplaced in zone N. Some of them would want gasholder no 8 to remain where it is, and some others wish to avoid having the gasholders in the site altogether.
- A small number suggest keeping the Western Transit Shed or at least the western wall and the basement.

CULROSS AND STANLEY NORTH BUILDINGS

- There was strong support for retaining Culross and Stanley North building. They argue that successful design and development can incorporate significant buildings to the development's advantage
- Introducing residential or community uses to the South part of the site would be safer and livelier in the evening.
- In relation to possible uses for Culross, proposals include social housing, with a nursery on the ground floor which would be convenient supporting residents and workers on site, and those working elsewhere using public transport.
- For Stanley Building North, community uses were suggested such as community offices or start-up community groups. Community facilities on the site proved a strong theme throughout the responses – see Community Section.
- For many, an issue strongly related to the retention of these two buildings, is the route of St Pancras Way. There is deep concern about this road and the traffic – a realigned road around the retained buildings would slow traffic.
- It was unclear from the documents and plans as to the routes to be followed by buses – see Transport Section.

COMMUNITY BENEFITS

- Safety – for residents and visitors – is a major concern. Safety is mainly related to two issues: firstly to the use of spaces (such as accessibility to the canal, housing and activities besides offices at the South part of the site), and secondly to traffic safety (changing routes of roads, taking precautions about traffic and speed). In residential areas a spread of private / council owned within the same building will assist security problems.
- Provision of jobs is also important. The heritage buildings in question are located in zone B where the major use is business and employment. Potential benefits might come to the community via job provision in the area of food and drink, hotels and serviced apartments or by increasing D1 uses in the specific zone. They would like further clarification of how this could be achieved.
- Using the Canal as a key resource – as affordable transport - was supported; community bus, freight or developer-funded transport.
- There was some acceptance that tall buildings would be needed on part of the site to generate funding for community benefit.

LAND USES GENERALLY

- The Forum found the requirement for flexibility of uses (the given maximum without minimum in some cases and varying ranges for a combination of uses within zones) very unhelpful and they wish to see fixed limits in order to have a clearer picture.
- The outline planning application makes it extremely difficult to make sensible points on urban design / public realm when the documents relating to these issues do not form part of the application.
- In general, people wish to see more housing and community D1 / leisure uses and more community space in the site and a reduction of office development.
- In regards to the south area of the site, there was strong support for some residential elements, in order to achieve mixed use and to increase safety of this part of the site during the evening.
- The Goods Yard complex is in general considered fine, although some argue that the suggested uses take too much from the community space.
- The North area of the site is regarded by some to be too great in terms of massing and, as shown, unable to develop a real sense of community. There needs to be a redesign.

HEIGHTS AND DENSITY

- The South part of the site is the one that should contain the greatest density and heights, second after zone T, but avoiding overshadowing of the Canal. Buildings should be stepped back from the Canal open space.
- People see zone T as the one with greatest height – but they propose that the facade should not be continuous.
- The Forum would not like to see the proposed maximum heights in the residential zones – they should be lower – and not massive blocks.
- Areas A because of the proximity of the station should contain the greater density in the southern part of the development. Areas B and U should have a lower density perhaps 5 floors and take account of Camley Street Park and the canal. The maximum height proposed should never be obtained anywhere in the site.
- Site T should perhaps be the highest density, however because of the towpath and because of the potential of creating a feeling of enclosure, site T should be broken up and not be a consistent block. Parking should be kept in site T.

LAYOUT

- The Forum found difficulty in understanding the relative size of roads and open spaces from the plans. This is an area where further clarification is required. A comprehensive plan showing footpaths, carriageway and shared facilities (cycle/ pedestrian etc), together with clarification on taxi and bus routes should be required before planning approval can be given.
- There is very strong concern that the park / green areas are small in relation to the overall site and community requirements.
- A number are unhappy with the street layout through the site and stress the need to facilitate pedestrian and cyclist rather than traffic movement.
- Potential large congestion problems were highlighted between zones N & S and that joining E/W zones into Copenhagen St is going to be problematic for community on that street outside the area. Not enough community space (D & E)

CANAL

- The majority of people are in favour of maximising accessibility to the Canal as long as it is achieved in a sensible way. **(PAL note: Forum – please define.....)**
 - Full demolition is unnecessary and the Forum would prefer to see partial demolition of canal walls was considered acceptable, wherever possible, to widen the towpath, and maximize use and accessibility of the canal. The specific areas mentioned where demolition would be acceptable, is at North Square, in front of zone N and the access steps down to the towpath. Keeping the Canal walls where safety allows or where the walls form parts of area buildings and use arches or opening to increase access while retain certain elements. The need for demolition, especially in the areas where the south and north areas connect, was understood. One response recommends the removal of the southern flank as an alternative to removing the retaining walls opposite Camley Street, another asks that the canal not be enclosed within tall walls to the south along Goods Way. Generally Other comments considered that demolition of the towpath walls would destroy unique atmosphere of canal. Others thought that the canal wall should be demolished, except where there are Fish and Coal building or other things to be conserved.
- There is strong opposition to tall buildings along the Canal – issues of shadowing, scale, environmental etc. Excessive building heights to the south will overshadow canal. This is unacceptable - the buildings should be set back and stepped away from the canal open space.
- There is general agreement that development along the canal will make the canal area more attractive and safer to use. Concerns expressed with the issue of safety along the canal, stated that security should not be seen as provided purely by better lighting.
- There was some concern about the affect of the lighting on Camley Street Natural Park, with a recommendation that lighting should be sited along the water's edge and pointed inward, away from the canal itself and the park.
- Comments on the building of new bridges were evenly split between those opposed and those for their construction.
- A number of responses explicitly oppose a footbridge into Camley Street Natural Park. **(PAL note: There is a problem with this in terms of establishing a good east west link - I propose we add “ However in order to establish a strong east west link the bridge should be sited immediately north of the Park”. This is likely to also reduce the opportunity to obtain contributions to the Park information centre and I am not sure if it is physically possible – could someone could confirm))**
- Other responses applied to the bridges generally and supported the need for bridges to enable good connections across the site.

- The design of bridges should be traditional to retain the character of the important (but sidelined) canal corridor

PAL Note: After each section we could do a summary of the key points that everyone agreed on. Some of these points may get moved to other sections

For example a summary of the above might include:

- **Retain Culross and Stanley North and realign road around it.**
- **Greater clarification on mix and floorspace of uses in each zone required as part of application**
- **Greater emphasis on pedestrians rather than traffic and more clarity on road network**
- **Examine opportunities for bridge crossing outside Camley Street Park**
- **Step back buildings adjacent to canal to avoid shading**
- **Residential and community uses to be implemented in south part of Main site**
- **Cultural facilities need to reflect existing communities and cater for both 'free' and 'paid' access.**

SECTION 2 - ENVIRONMENT

TREES / MICROCLIMATE

- Tree species should be diverse and of value to a range of wildlife species across the site.
- There was considerable disappointment with the net increase in tree planting being proposed, and a recommendation that more shrubs and hedgerows (**PAL note: Are 'hedgerows' appropriate across an urban site like this? Please let us know where you see these or do you mean a wider definition of hedgerow in terms of continuous green corridors which will come over better we feel and achieve the same ends**) should be included in the planting.
- Concern was raised about microclimate conditions brought about by declining light levels due to building near the canal. The canal's biodiversity will be affected by light levels.

OPEN & GREEN SPACE

- Provision for open space was considered to be inadequate, especially the "Long Park" green (?) space in the north of the site, appearing very modest for such an intense development.
- The use and type of open space was considered to be a key factor in assessing the quality of life which would be experienced by site users. The uses of and general characteristics of the network of open spaces across the site should be agreed at this early stage. The phrase 'Park' has green connotations for example but the concept shows it to be hard landscape. The balance between activities, traffic v pedestrians, informal v formal, greenness v. hard, needs to be agreed at this stage for the value of each space to be fully understood.
- One response was pleased to see that the Long Park open space would be bordered by residential uses, and this would make it more attractive for families and other local residents.
- In terms of open and green spaces connecting up with other green areas to create wildlife corridors, it was noted that Camley Street Natural Park already contributed with this, and that a wildlife corridor should be considered north to south across the site.
- Provision of viable public space in front of granary would encourage use **PAL Note: Of what?? the building, the space, the canal??.**

SUSTAINABILITY

- As a key London development site, and one with high transport accessibility, the scheme should be setting an example in terms of sustainability. There is an opportunity for it to 'lead the field' in London / the world e.g. seeking adoption of the "excellent" BREEAM building standard for buildings on the site, securing lower levels of car usage across the site and setting up specific mechanisms whereby users must enter into an agreed system rather than the more flexible 'encouragement' proposals suggested by the supporting documents. The site should fully embrace the meaning of sustainability in all processes and facilities which would bring international accolades.
- Individual suggestions include constructing holding tanks for rainwater on site with a slow release into the drains with foul discharge, and the need for a study of flow capacity to the main sewer to be carried out.

SECTION 3 - TRANSPORT

VEHICULAR ROUTES

- The number of primary routes and vehicular junctions should be reduced – in particular the proposed of Pancras Road is not popular as a route. There should be many routes within the site but not as primary routes for large volumes of traffic.
- The emphasis should be on walking and cycling routes – the application emphasis is seen to be on vehicles.
- The route layout needs to take account the variation of ground levels in the site, and primary routes including Goods Way and York Way and junctions should avoid inclines, in order to cause minimum noise and pollution.
- Roads should be designed to discourage speeding e.g. Home Zone – 20mph or less- planning; all roads with pavements; in particular Goods Street East and West are too straight which will encourage speeding.
- Given the public transport accessibility of the site there should be limited private car access within the site, with the exception of taxis and disabled transport. Examples given include Greenwich Millennium Village – no parking on-street, limited residential parking for both private and social housing etc See also Parking.
- The layout doesn't respect features like the Stanley or Culross buildings or existing railway tunnels, which are difficult to build over. The buildings could easily be retained and the road layout amended to the improvement of the scheme.
- Primary road cuts through the public realm in Market Square. This should definitely be avoided.
- The lack of perceived pedestrian access routes in zones L and K.
- The minimum route widths should measure from the first floor building overhang, and not include any recessed ground floor level.
- Road widths- Generally it was thought that the road widths were too narrow to allow for vehicles, pedestrians and cyclists, though some respondents indicated that wider roads would encourage more traffic to pass through the site. **PAL Note – do you really want wider roads or better designation and control of vehicles so more room for pedestrians – comments please?**
- Public realm, roads, cycle paths, footpaths, etc should be designated public highway and adopted and managed by the local authorities.

PEDESTRIAN AND CYCLE ROUTES

- Vast majority of respondents considered cyclists, pedestrians and vehicles should have defined paths on primary, secondary and tertiary routes and in other public realm areas. Currently only York Way/ Goods Way and Pancras Road have separate cycle routes- as a minimum all primary routes should have are separate cycle lanes.
- Pedestrians should have priority over vehicles, with pedestrian routes on primary, secondary and tertiary routes.
- One side of Long Park should be for pedestrians only.
- All roads should have footpaths.
- There should be a pedestrian route from Bridge 1 (BR1) north eastwards.
- Pedestrian route A1 should be an actual link, rather than a potential one.
- Network Rail and the developers should have a joint development for bridge WR1.
- Cycle routes within the site should be integrated with cycle routes surrounding the site, and measures taken to ensure that it does as part of this planning application. It was not clear how the cycle route proposed through the northern end of Camley Park joined with a network effectively. Measures would be needed to be undertaken outside and around the site to ensure effective integration.
- Main crossing of Goods Way and routes over Bridges 1 and 2 need sensitive treatment. Will be conflict between pedestrians and vehicles.
- Some communities, such as Islamic women, do not ride bicycles, but instead will walk or take public transport, such as trams. Acceptable forms of transport for all should be a key concern and further consultation is required to ensure that they are fully catered for.
- Pedestrian and cycle routes need to be physically overlooked for safety reasons - routes overlooked by residents in ground floor housing are safer at night than those routes running past office blocks –ground floor housing was not included in the proposals but is the preferred form of security.
- Walking from west through the site to Kings Cross needs to be made safe by being overlooked by residential accommodation i.e. housing south of the canal.
- Pedestrian friendly measures such as two-way working narrow crossings and bus stops where people need them should be introduced. **(PAL note: More explanation needed of this comment please)**

ACCESS INTO THE SITE

- There was strong opposition Bridge 3 (BR3 and CAM1), and that it should be deleted from the proposals, as it is not necessary, and it is more important to protect the park Suggested alternatives were to
 - provide a ramp further north between Camley Street and towpath, and
 - provide pedestrian and cycle link from Camley St to Agar Grove, or

- provide bridge to link development with Maiden Lane or
- provide a third canal bridge but in a different position to link to the path on Camley Street.
- A cycle and pedestrian route should be provided under St Pancras station extension to Brill Place.
- No sufficient direct routes from East (Camden). One person mentioned a lack of vehicular access to the north of the site from Camden.
- Safe crossings of York Way should be provided in addition to those shown at junctions. In addition safe crossings should be identified throughout the site on additional routes such as Pancras Road and form part of the application.

ACCESS WITHIN SITE

- There should be step free access to/ from the canal
- Bridges- number of bridges – some thought fewer, some more up to 6. Several people thought that Bridges 1 and 2 should be combined, and that it should form a direct route north and not cut across Long Park. Several people thought that Bridge 1 was in the wrong place and too wide and drops traffic in the centre of the Granary open space. Other people thought that the current location of bridges BR1 and BR2 is acceptable. Several people thought Bridge 2 should be extended to comprise a flyover or underpass with shops/ kiosk over Goods Way, to avoid crossing busy road.

PUBLIC TRANSPORT

- The Developer should pay for improvements to public transport infrastructure.
- The development will increase demand for public transport in all directions, and will have a major impact on the infrastructure. There would need to be additional bus services serving within and around the site.
- There is considerable concern about the lack of integration of transport planning applications with the rest of the proposals.
- The assessment that existing infrastructure can cope takes no account of the Disposal Study produced in 1998. Change infrastructure. **(PAL note: What is meant by last comment?)** The problem is the statements are poor assessments or inaccurate – see CTRL St Pancras Dispersal Study (DFT for CTRL select Committee) **Can you give an example of where the assessment is 'wrong or poor please within those documents eg conflicting info from a paragraph from the developers document compared with the study you refer to?)**
- Particular concerns are the lack of dedicated bus interchange facilities; lack of integrated planning of internal bus routes with outside; loss of opportunity to rethink bus network over this part of central/ north London; inadequate circulation space on unwidened platforms and concourses for rail and underground; increase to dangerous limits on tube. Design transport links right (e.g. new station at Maiden Lane is required).
- The proposals will add to traffic pollution- extra cars and buses and taxis., and increase congestion.
- Capacity is a key issue – many in the Forum do not believe that there is sufficient- lack of future capacity on York Way and Pentonville Road; Euston Road is already jammed.
- Have highway networks been designed to take on use of bendy buses?
- Internal bus routes may be acceptable but the Forum would need more information to know how they link with existing bus routes around the site. There was also concern expressed over the routing – routes south to north were clearer than north to south.
- There is concern about the knock on impact on available capacity further down the bus / underground/ rail routes, even if there is enough space for passengers starting their journey at Kings Cross. How has this been taken into account?

PARKING

There was considerable concern as to the levels of car accessibility to the site. **PAL Note: this section is still to be rationalised to fit all similar parking comments together.**

- Early provision of car parking spaces is unacceptable and inconsistent with the low car use ambitions of the developer. Provide parking spaces and you encourage people to drive. This is the most accessible site in London and therefore reliance on vehicle access should be reduced substantially. If you can't do it here where can you achieve it?
- Multi storey car park should be prohibited and replaced with a shared car scheme available to residents on site and adjacent.
- Car parking is excessive and should be reduced. Multi storey car park is unacceptable and should be deleted. If there has to be a multi storey car park, better to be in the north of the site.
- The number of private car trips needs to be clarified.
- There should be no on street parking- all should be in basement or multi storey car park.
- Disabled parking should be increased to 10 % from 5%.
- Limited on street parking, priority disabled drivers should be everywhere and part of commercial near CPZ.

- Limited car parking for residents who are disabled, have young children are elderly etc and even more limited for visitors. No car parking for commercial development, only residential.
- The Multi Storey Car Park is located in the right place but it should increase the number of other spaces to 1000 and most of the other car parking spaces should be located within the basement- no on-street parking is necessary.
- Cycles- secure cycle parks should be provided near each entrance of each housing block, office block transport node and recreation facility.
- Cycle parks should be all over site, close to point of use. Cycle parking everywhere. Facilities for some bicycle parking should be near every building which has a public use
- Motor cycle parking should be provided throughout the site.
- Car parking should be provided for elderly and disabled attached to a nearby residential.
- Leisure facilities should be ones that do not generate much traffic
- Car clubs - Requirement for car parking should be reduced by provision of car hire/ club facilities.

TRAVEL PLAN

- Travel Plan should form part of the planning application, otherwise it is not enforceable.
- The word 'encourage' in the Travel Plan is completely worthless. More formal commitment is needed.
- Compliance with the Travel Plan should be mandatory.

CANAL

- Proposals for canal are very poor and dismissive of sensitivities of canal and its full potential use and benefit.
- Safety and perceived safety need to be addressed. Under bridge lighting desirable, though fewer bridges would be preferred.
- More should be made of the canal as a public transport route. Variety of ways that the canal could be used for transport are suggested, including transporting materials in the construction phase; transporting waste and freight; canal buses (possibly a direct route to Camden Town and City Road) and taxis for commuters and tourists; responses included that the canal should be used for leisure uses only, the towpath for pedestrians only, and if Maiden Lane station is not built, passengers should be ferried from Camden Road station to the west end of the lock.
- There should be access for disabled to the canal and toilets should be provided within the canal towpath. Signs for pedestrian in different languages, and to support disabled people.
- The canal should comprise a real link between northwest and south east.
- Design of bridges to be canal style to retain the character of the important (but sidelined) canal corridor.

OTHER TRANSPORT ISSUES

- Transport assessment must form part of the planning application.
- Transport Assessment – why did this include a high proportion of education journeys by car? This is against all Camden's policies and not necessary.

ISSUES STILL TO BE REALLOCATED TO RELEVANT SECTIONS

- More of the site should be specifically designated as D1 community usage. And D1 should be explicit about is private v public use.
- In lieu of the demolition of the Culross buildings and additional D2 usage should be identified. Give to local groups specifically engaged in community development.
- Existing Goods Way moorings should be protected, with existing residents having security of tenure.

GENERAL COMMENTS ON APPLICATION INFORMATION

PAL note: This last section will be some general notes. We have some ideas but you are welcome to add anything you want to as we didn't ask this at the workshops. Our comments will be based on our own experiences in assessing the documentation and seeing how you got to grips with it and what information you all needed.

Any comments you want to make about the documents / information etc please out here.