

Response to Argent's Revised Outline Planning Application for Kings Cross Central

Camden Cycling Campaign – November 2005

This submission to Camden's Planning Department is from Camden Cycling Campaign (CCC), representing almost 600 cyclists in the Camden area. It was prepared by a sub-committee with input from the committee and members and was assisted by attending the various meetings of the Kings Cross Development Forum, Kings Cross Railway Lands Group, and Planning Aid for London. The submission is divided into two parts: (A) Summary and Key Issues and (B) Specific Cycling Issues and a table summarising the specific issues is provided as an appendix.

A. Summary and Key Issues

Argent St George's original outline application for planning permission on the 53-acre King's Cross site, and Argent's Revised Planning Schedule both embrace the principle of providing adequate cycle routes and facilities, and of 'permeability' allowing for ease of access to and from all neighbouring areas.

The UDP and the Supplementary Planning Guidance lay down requirements and 'material consideration' for the provision of safe cycle routes into and through the site, and of adequate cycle parking for commercial staff, visitors and residents on site. The question-and-answer workshops used to gauge local groups' views on the Revised Planning Schedule showed marked support for more and better cycling facilities.

Despite all these stated requirements, recommendations and good intentions, the Revised Development Schedule provides no cycle access into the site except along existing shared roadways or walkways; no segregated cycleways on site; and parking facilities fall far short of Argent's own aspirations and of transport policy.

Camden Cycling Campaign urges that cycling needs must be assumed as integral to the development and designed into the site from the outset. This has become all the more imperative given the dramatic recent upsurge in the number of cyclists using London's roads, which is still rising and will continue to do so in future as fuel becomes more expensive.

Properly managed, cycling will be a significant element in the easing of transport/environmental problems on this heavily used, crowded nexus of railway, bus and underground links, combined with a busy commercial centre and residential site. Cycling is silent and sustainable and makes a positive contribution to reducing traffic-induced carbon emission. Proper allowance for access and circulation for cyclists and plenty of secure cycle parking would provide an economical, efficient and environmentally sound solution to the transport needs of thousands using the site daily.

Failure to meet the needs of this growing minority should no longer be an option in the twenty-first century metropolis. CCC is extremely concerned that shared use of narrow thoroughfares with buses, taxis and possibly trams, potential conflict with pedestrians on crowded walkways and minimal storage facilities can only deter the fainthearted and add to the city's pollution and congestion problems.

Camden Cycling Campaign welcomes the following commitments made by Argent King's Cross in their Revised Development Schedule:

1. the specific community facilities identified in Clause 3.29 especially item (i),
2. the pedestrian and cycle (only) routes within the development zones shown in Parameter Plan KC007 and described in Annex C,
3. the Urban Home Zones described in Clause 4.40,

4. the commitment to the pedestrian/cycle (only) route A1 given in Clause 4.43(iv) that would link to a new bridge (WR1) across the King's Cross tracks to Wharfdale Road and
5. the agreement that major routes in the development should be adopted by the local traffic authority.

However, Camden Cycling Campaign also notes that the application remains in breach of UDP policies in several areas and there need to be further changes to the Development Schedule for it fully to comply with this and various other LPA policies.

In particular:

1. allowance needs to be made for space for secure cycle parking throughout the development area in accordance with UDP policy TR22 (adopted) or T3 (draft replacement) at the rates specified in the appropriate development standards for the various land uses proposed. It is noted that approximately 4000 cycle parking spaces will be required for this site and that car and service vehicle parking has been specified at this stage; why not cycle parking?
2. the widths of Pancras Road (especially at its southern end) and the Boulevard need to be increased to allow for the inclusion both of the Cross River Tram and of the cycle lanes required under Chapter 13 policy KC12 and UDP policy TR22 (adopted) or T3 (draft replacement). Latest TfL guidelines (LCDS section 4.3) state that lane widths for shared bus and cycle use should be a minimum of 4m and preferably 4.5m.
3. the Goodsway cycle lanes should be extended for the entire length of that road.
4. the width of taxi and service vehicle route B1, PS1, B2 described in parameter Plan KC007 and in Annex C should be increased to allow for east-west cycle movement in accordance with Chapter 13 policy KC6.
5. tertiary route R4 should be included in the Urban Home Zone proposals given in Clause 4.40.
6. the pedestrian/cycle (only) routes and bridges proposed (and welcomed) and described in Parameter Plan KC007 and in Annex C must be designed as segregated to avoid pedestrian/cyclist conflict in accordance with UDP policies TR19, TR21 and TR22 (adopted) and T3 and T12 (draft replacement).
7. pedestrian/cycle (only) links north to the Maiden Lane Estate, south to cross Euston Road and west to connect to LCN route 6 should be provided as required by SPG clauses 2.3.23, 2.3.25, 2.3.26 and 2.3.27, and Chapter 13 policy KC6.
8. dedicated 2-way cycle lanes must be provided on Midland Road if this is to replace Pancras Road as the designated access and N-S cycle route as specified in the Revised Development Specification.
9. a 20 mph zone should be implemented across the whole site.

B. Specific Issues

We have divided these into four key areas. UDP Policy references are to the 2000 version.

1. Access to the development (UDP Policies KC6, KC10)

Access from the North

The cycle lanes on York Way north of Wharfdale Rd must be continuous throughout, especially in the railway underpasses, and should be widened to 1.8m to provide further isolation from fast moving HGVs. This is a very busy and dangerous road for cyclists and pedestrians and further safety measures are urgently needed.

A ramp from the canal towpath to Camley St at the oblique bridge and a link from Camley Street to Agar Grove would give access from the northwest, which is otherwise impermeable, and would reduce the need for cyclists to use York Way. This should be

based on the 'Camley Street Report' of August 2003, produced by Tom Young Architects on behalf of Camden Cycling Campaign. (Tom Young Architects, 24a Bartholomew Villas LONDON NW5 2LL, 020 7482 3993, thdyoung@compuserve.com). It could be funded under a section 106 agreement and is supported by Camden Square Neighbourhood Association and Camden Square Conservation Area Advisory Committee.

Access from the South:

A safe Euston Rd crossing from Pancras Rd to Argyle St/Belgrove St is needed (see links to LCN below).

Access for cyclists into Midland Road from the south, including a crossing of Euston Road, is required. Northbound cycling on Midland Road should be allowed to provide access to the International and Domestic terminals of St Pancras Station and the future Thameslink Station, as this journey will be difficult and dangerous on Pancras Road given the high level of contention and removal of cycling facilities (use of Midland Road is specified in the Revised Development Specifications).

Access from the East

The proposed Goodsway cycle lane should be extended to York Way.

Step-free access (ramps) to/from the canal towpath must be specified.

CCC support the proposed pedestrian/cycle link to Wharfdale Rd, which should become part of the application.

Access from the West

The proposed Goodsway cycle lane must be extended under the CTRL tracks and linked via Chenies Place to LCN+ route 6. This is essential if the cycle lane on Pancras Road is removed.

A new traffic-free access from the north of the site to the west must be provided. Camley Street Natural Park lies outside the site and there is no special reason why the pedestrian/cycle bridge should run over it; a cycleway could enter the site via ramp at oblique bridge, provided the canal path is broadened to avoid congestion.

The cycle & pedestrian route under the St Pancras station extension linking to Brill Place must be re-instated.

Step-free access to/from the canal towpath at the westerly entrance to the site must be specified.

Links to the London Cycle Network (LCN+)

Links to Brill Place and/or Chenies Place (for LCN+ 6), to Agar Grove and to Argyle St/Belgrove St (for SSL/LCN+ 0) must be provided.

2. Circulation within the site (KC5, KC6, KC12)

CCC demand that there be a 20 mph speed limit throughout.

CCC support improvements to the canal towpath, which should be done in co-ordination with British Waterways.

Ramps are needed at significant access points to the canal towpath including at Canal St.

3. Facilities within the site (TR22)

Cycle Parking at residential units: CCC support two secure spaces/unit (and see UDP development standards). This must be specified now (as is the case for motor vehicle parking), not left to the time of application for specific buildings.

Cycle Parking at the workplace: See UDP development standards (1 per 250 sq.m). Showers and changing facilities should be required.

Bicycle user groups, workshops & cycle hire facilities: CCC request that these be promoted to application status.

4. Other Issues (TR22)

Protection of cyclists and pedestrians during construction must be made explicit.

Existing cycleways should be kept open during construction and new cycleways should be installed early in phasing.

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See attached appendix for summary of issues.

Kings Cross Development: Cycling Issues – Summary

Issue	Application Says	CCC Position	UDP Policies
1 Access to Site			
1.1 From North (York Way, Camley Street)	On-street cycle lanes on York Way as now (DS.76)	1.1.1 Improve York Way to include continuous cycle lanes especially in underpasses 1.1.2 Ramp from towpath to Camley St at oblique bridge & link to Agar Grove under section 106 agreement as per CCC design dated August 2003 (funded by CCCU)	TR22b, TR22d <i>(T3a, T3b)</i>
1.2 From South (York Way, Pancras Rd., Midland Rd)	No specific facility	1.2.1 Continuous cycle lanes on York Way north of Wharfdale Rd for both N-S and S-N directions. 1.2.2 Safe Euston Rd crossing from Pancras Rd to Argyle St/Belgrove St 1.2.3 Euston Road crossing from Judd St to Midland Road and two-way segregated cycle lane on Midland Road to replace facilities lost on Pancras Road	TR22b, TR22d <i>(T3a, T3b, T3g, T3h)</i>
1.3 From East (Copenhagen St, Wharfdale Rd, canal)	EW route through site linking to Copenhagen St (35.11, 38.143) Cycle/pedestrian route over KX tracks to Wharfdale Rd (38.23)	1.3.1 Safe crossings and junctions on York Way 1.3.2 Step-free access to/from canal (ramps) 1.3.3 Support pedestrian/cycle link to Wharfdale Rd	TR22b <i>(T3g)</i>
1.4 From West (Brill Place, Chenies Place, Goodsway, canal)	2-way cycle lane on Goodsway (DS.76) Pedestrian/cycle route & bridge to Camley St (DS.29, 38.143)	1.4.1 Extend Goodsway cycle lane under tracks 1.4.2 New traffic-free access to west needed 1.4.3 Cycle & pedestrian route under St Pancras station extension linking to Brill Place 1.4.4 Safe route from Chenies Place into Goodsway 1.4.5 Step-free access to/from canal	TR22b, TR22d <i>(T3a, T3b)</i>
1.5 Links to existing and planned LCN+ routes	Recognises this (35.14)	1.5.1 Links to Brill Place (for LCN+ 6), Agar Grove and Argyle St/Belgrove St (SSL/LCN 0)	TR22b, KC6, KC10 <i>(T3c, T3g)</i>
2 Routes within Site			
2.2 On new primary routes	Boulevard – cycles share street (DS.39)	2.2.1 20 mph speed limit throughout	TR22b, KC6, <i>(T3a)</i>
2.3 On new minor routes	Pedestrian & cycle routes within development zones (38.23)	2.3.1 Support cycle routes 2.3.2 20 mph speed limit throughout	TR22b, KC6, KC12 <i>(T3a)</i>

Bold – Promote from support to application status

UDP Policies in **bold** are from 2000 adopted version
UDP Policies in *italics* are from 2004 draft version

Issue	Application Says	CCC Position	UDP Policies
2.4 On canal towpath	Remove pinch-points, improve access (38.142)	2.4.1 Support improvements to towpath in co-ordination with British Waterways 2.4.2 Ramps at significant access points including Canal St and York Way	KC5 (<i>T3c</i>)
3 Facilities within Site			
3.1 Parking at residences	Estate management would incorporate cycle parking (39.31). One space per 20 units (38.144)	3.1.1 Two secure spaces/unit (and see UDP development standards)	TR22c (<i>T3j</i>)
3.2 Parking at workplaces	Cycling encouraged, parking facilities (1 per 350 sq.m) (35.37, 38.143, 38.144, 39.31)	3.2.1 See UDP development standards (1 per 250 sq.m) 3.2.2 Require showers, changing facilities	TR22c (<i>T3j</i>)
3.3 Parking at stations		3.3.1 Application should support facilities	TR22c, TR22d (<i>T5a, T5b</i>)
3.4 Bicycle User Groups, Cycle hire, workshops etc	Supported in Green Travel plan (39.32)	3.4.1 Promote to application status	(<i>T7</i>)
4 Other			
4.1 Camley Street bridge	Cycle/pedestrian access to west (DS.F.59, 38.143)	4.1.1 New traffic free route from north of site to west	
4.2 Camley Street link to Agar Grove		4.2.1 Improve access from towpath to Camley Street and implement link as per CCC design dated August 2003 (funded by CCCU)	(<i>T3c</i>)
4.3 Interim situation		4.3.1 Protection during construction 4.3.2 Existing cycleways to be kept open 4.3.3 New cycleways to be installed early in phasing	TR22b (<i>T12</i>)
5 Status	Almost all have support status	5.1 Promote key issues (in bold type) to application status	TR3 (<i>T1b,</i> <i>T1c</i>)

Notes:

Items in bold should be promoted from support to application status as per London Plan Policy

London Plan policy 3C21 states that the Travel Plan should be part of the application, not have support status

Bold – Promote from support to application status

UDP Policies in **bold** are from 2000 adopted version

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Key Documents Referred to in CCC Submission and Summary Table

Doc Ref	Version	Title
DS	Revised	Main Site Development Specification
PP	Revised	Main Site Development Specification - Parameter Plans
35	Original	Public Realm Strategy
38	Original	Transport Assessment
39	Original	Green Travel Plan
43	Original	Environmental Statement - Vol 1 - Parts 1-8
IHPD	Revised	Illustrative Highways Proposals Drawings

Numbered references are to documents as numbered on original Application CDs. Letters refer to the revised application documents as available on Camden's website. Page numbers as on documents where available, otherwise sequential.

Camden Cycling Campaign, November 2005