

## **Response from Camden Cycling Campaign to Argent St George's Outline Planning Application for Kings Cross Central**

This submission to Camden's Planning Department is from Camden Cycling Campaign (CCC), representing more than 570 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.

We have a number of general and specific points which we want Camden's planning department to take note of in their response to Argent St George (ASG). They are listed below, and the specific issues also appear in tabular form, where references to the Application documents and to the UDP (2004 version) are listed.

We would welcome the opportunity to provide further clarification as required. Please contact one of the CCC members listed below.

### **A. General Comments**

This complex site of more than 10 hectares dominated by railway redevelopment will need to service the millions of local, national and international passengers who pass through Kings Cross and St Pancras each year. The design should improve restricted movement into and within the site and open it up to neighbouring areas. The development needs to provide a new identity for an under-used part of central London the size of a small city. The following broader issues are relevant to the cycling constituency.

**Integration:** CCC notes with concern that the application documents contain many hopes but no guarantees for physical, social, economic integration with adjoining neighbourhoods and local communities.

**Public Realm Space:** Apart from the Granary Square and Coal Drops area north of the canal, Public Realm space is squeezed by maximum allocation of ground space for commercial development. Minimal green space is disguised by Camley Street Natural Park's regular appearance on the plans though it is not part of the site. More specifically road widths are not generous: CCC argues for less ground footage for commercial development and more allotted to thoroughfares, increasing allocation for designated cycle tracks/ pedestrian walkways.

**Security/safety** considerations should be integral to the built environment – eg cycle lanes overlooked by residents in ground-floor housing are safer than those running past anonymous office blocks. A particularly bad example is on the northern section of Pancras Road. Ground-floor housing does not feature in these plans, or housing of any sort by the canal, the area most sympathetic for residents. There is concern about the allowance of affordable housing and specifically the shortage of larger family units which would create "critical mass" for the development of a community and thereby lend security and identity to the area. To this end, the residential areas would need to be brought in from the periphery to the core of the development.

**Maintenance** ASG's application specifies the site to be under private or public/private 'stewardship' overseeing security, road maintenance, refuse collection etc. This (1) runs the risk of creating a psychological barrier to seal it off from neighbouring areas; (2) raises problems of 'linkage'; (3) lacks the check of public accountability if standards fall. Camden Council's brief stated all public highway to be managed by Camden.

## **B. Status of Supporting Documents**

There are many issues covered in supporting documents which should be 'promoted' to application status. These are noted below. In particular, the London Plan and Camden's UDP require that the Travel Plan be in the application. Currently it is a supporting document. This must be rectified.

## **C. Specific Cycling Issues**

We have divided these into four key areas. We also highlight with an asterisk \* those aspects which are currently in supporting documents but which should be in the application proper:

### **1. Access to the development**

#### **Access from the South:**

CCC support the cycle lane on Pancras Road in principle but not if it stops at every entrance as shown in the Illustrative Highways Proposals Drawings. We will actively campaign against any design incorporating giveways to minor side roads and service entrances on the grounds that the facility does not seriously address the needs of cyclists and would thus be little used by them. The cycle lane width should be a minimum of 2.5m and preferably 3m (this applies to all 2-way cycle lanes).

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

#### **Access from the North**

A segregated cycle way on York Way north of Wharfdale Rd is needed, especially in the railway underpasses. This should either be 2-way with width as above (min 2.5m) or there should be two 1-way cycle lanes of minimum width 1.5m. This is a very busy and dangerous road for cyclists and pedestrians and 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](mailto:thdyoung@compuserve.com)). It could be funded under a section 106 agreement.

#### **Access from the East**

\*Safe crossings and junctions on York Way must be made part of the application

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 should be extended under the CTRL tracks and linked via Chenies Place to LCN route 6.

CCC oppose the proposed new bridge to Camley St – it has no benefit for cyclists as it does not link to other routes. Visitors to the Nature Park by bicycle can use the canal or Goodsway cycle path and Camley St.

The cycle & pedestrian route under the St Pancras station extension linking to Brill Place should 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+)**

\*Include links to Brill Place and/or Chenies Place (for LCN 6), to Agar Grove and to Argyle Street ( for SSL/LCN 0)

## **2. Circulation within the site**

\*CCC request that there be a 20 mph speed limit throughout

Private cars should be banned from Pancras Rd to reduce contention with pedestrians and cyclists.

Current plans have this road carrying an excessive mix of traffic.

Introduce 2-way cycle facility on Boulevard & all other routes (contraflow if necessary)

Consider change in level where pedestrian routes cross Goodsway so that contention between pedestrians, cyclists and motor vehicles is removed

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**

Cycle Parking at residential units: CCC support two secure spaces/unit (and see UDP development standards)

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

Cycle Parking at Stations: Application should support facilities (see UDP Policy 5)

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

## **4. Other Issues**

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

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

John Chamberlain and Anne Boston

[jxchamberlain@aol.com](mailto:jxchamberlain@aol.com)

[a.boston@britishlibrary.net](mailto:a.boston@britishlibrary.net)

020 7485 2685

020 7485 0686

Camden Cycling Campaign

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### Kings Cross Development: Cycling Issues – Summary

Issue	Application Says	CCC Position	UDP Policy
<b>1 Access to Site</b>			
1.0 General	<b>Full public access (35.76) but privately managed</b>	<b>1.1 Support Camden’s position on public access – public areas must be managed by Camden</b>	<b>SKC1</b>
1.1 From South (York Way, Pancras Rd., Midland Rd)	2-way cycle lane on Pancras Rd (12.50, 38.143) Bus, car, taxi N-bound, taxi S-bound (12.50, 38.143)	1.1.1 Support cycle lane but it must not stop at every entrance as shown. Width should be 2.5m minimum. 1.1.2 Ban private cars from Pancras Rd to reduce contention with pedestrians and cycles. 1.1.3 Segregated cycle way(s) on York Way north of Wharfdale Rd for both N-S and S-N directions. 1.1.4 Safe Euston Rd crossing from Pancras Rd to Argyle St	<b>T3a, T3b, T3g, T3h</b>
1.2 From North (York Way, Camley Street)	On-street cycle lanes on York Way as now (12.51)	1.2.1 Improve York Way to include segregated cycle lanes especially in underpasses <b>1.2.2 Ramp from towpath to Camley St at oblique bridge &amp; link to Agar Grove under section 106 agreement as per CCC design dated August 2003 (funded by CCCU)</b>	<b>T3a, T3b</b>
1.3 From East (Copenhagen St, Wharfdale Rd, canal)	EW route through site linking to Copenhagen St (35.11, 38.143) <b>Cycle/pedestrian route over KX tracks to Wharfdale Rd (38.23)</b>	<b>1.3.1 Safe crossings and junctions on York Way</b> 1.3.2 Step-free access to/from canal (ramps) <b>1.3.3 Support pedestrian/cycle link to Wharfdale Rd</b>	<b>T3g</b>
1.4 From West (Brill Place, Chenies Place, Goodsway, canal)	2-way cycle lane on Goodsway (12.50) Pedestrian/cycle route & bridge to Camley St (12.57, 38.143)	1.4.1 Extend Goodsway cycle lane under tracks 1.4.2 Oppose bridge to Camley St – no benefit 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	<b>T3a, T3b</b>
1.5 Links to existing and planned LCN+ routes	<b>Recognises this (35.14)</b>	<b>1.5.1 Links to Brill Place (for LCN 6), Agar Grove and Argyle Street (SSL/LCN 0)</b>	<b>T3c, T3g</b>

Issue	Application Says	CCC Position	UDP Policy
<b>2 Routes within Site</b>			
2.1 On existing roads	Pancras Rd – see above Goodsway – see above, but note predicted 12-14,000 pedestrian crossings per hour (35.14, 43.5.67).	2.1.1 Consider change in level so that contention between pedestrians, cyclists and motor vehicles is removed	<b>T3g</b>
2.2 On new primary routes	Boulevard – public transport & taxis N-bound only, cycles on street (12.51)	<b>2.2.1 2-way cycle facility on Boulevard &amp; all other routes</b> <b>2.2.2 20 mph speed limit throughout</b>	<b>T3a</b>
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	<b>T3a</b>
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	<b>T3c</b>
<b>3 Facilities within Site</b>			
3.1 Parking at residences	<b>Estate management would incorporate cycle parking (39.31). One space per 20 units (38.144)</b>	<b>3.1.1 Two secure spaces/unit (and see UDP development standards)</b>	<b>T3j</b>
3.2 Parking at workplaces	<b>Cycling encouraged, parking facilities (1 per 350 sq.m) (35.37, 38.143, 38.144, 39.31)</b>	<b>3.2.1 See UDP development standards (1 per 250 sq.m)</b> <b>3.2.2 Require showers, changing facilities</b>	<b>T3j</b>
3.3 Parking at stations		3.3.1 Application should support facilities	<b>T5a, T5b</b>
3.4 Bicycle User Groups, Cycle hire, workshops etc	Supported in Green Travel plan. (39.32)	<b>3.4.1 Promote to application status</b>	<b>T7</b>

<b>Issue</b>	<b>Application Says</b>	<b>CCC Position</b>	<b>UDP Policy</b>
<b>4 Other</b>			
4.1 Camley Street bridge	Cycle/pedestrian access to west (12.57, 38.143)	4.1.1 Support Camley Street Nature Park – bridge to nowhere is not needed	
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)	<b>T3c</b>
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	<b>T12</b>
<b>5 Status</b>	Almost all have support status	5.1 Promote key issues (in bold type) to application status	<b>T1b, T1c</b>

Notes: References are to documents as numbered on Application CDs. Page numbers as on documents where available, otherwise sequential.

**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

#### Key Documents Referred to in CCC Submission and Summary Table

<b>Doc No</b>	<b>Title</b>
<b>12</b>	<b>Main Site Development Specification</b>
<b>13</b>	<b>Main Site Development Specification - Parameter Plans</b>
<b>35</b>	<b>Public Realm Strategy</b>
<b>38</b>	<b>Transport Assessment</b>
<b>39</b>	<b>Green Travel Plan</b>
<b>43</b>	<b>Environmental Statement - Vol 1 - Parts 1-8</b>
<b>47</b>	<b>Illustrative Highways Proposals Drawings</b>