

Camden Cycling Campaign Comments on 2020 Site Allocation Draft Plan

To: PlanningPolicy@camden.gov.uk

This response to Camden Council's consultation concerning the 2020 Site Allocation Draft Plan is from Camden Cycling Campaign, the local borough group of London Cycling Campaign. We represent the interests of cyclists living or working in Camden and aim to expand the opportunities for all to cycle safely in the borough.

We have reviewed the documents in the light of the Camden Plan and recent Area Framework Plans which we have been involved in. We will confine our comments to areas which directly affect cyclists, that is to say mainly permeability and safety issues, and will not comment on the actual allocation. In the tables below, when we say "We support..." we mean that we support the cycling-related elements of the policies.

Overall we think the draft plan is very good. In the main, our concerns about safety and permeability are addressed though there are some omissions and inconsistencies which we will highlight. For example, in the section on Camden Goods Yard, the proposed "Spinal Route" in 5.36 is described as including cyclists in 5.95 under CGY7 Gilbey's Yard, but does not mention cyclists in 5.36 and 5.39 (CGY2), nor in 5.83 and 5.84 (CGY6) and in 5.74 (CGY5) states it is for pedestrians, hence, by implication, excluding cyclists.

One general issue relates to the pressures on highways caused by increased density of occupancy which, along with the switch to active travel, will mean that carriageway space is at even more of a premium. New buildings should be required to release space back into the public domain, to be shared as appropriate between pedestrians and cyclists while allowing room for well-engineered bus stops and/or electric vehicle charging points where appropriate. An example of where this is important is in IDS6 and IDS8 on Kentish Town Road which is very constrained but is designated as a future cycle route in the Camden Transport Strategy.

Finally, pavement widening should never be at the expense of space for safe cycling. We have pointed this out in a few key areas but it should be a major consideration whenever a development is planned.

The following tables contain our comments on the Policies and, where applicable, specific paragraphs within the document.

Section	Comments (Policies & Specific Paragraphs)
01 Introduction	
1.13	Construction Management Plans: Construction has a major impact on cycle and pedestrian routes both adjacent to the site and throughout the borough. Journeys should be minimised as far as possible and the use of public highway during construction (pit-lanes etc) should be much more restricted.
02 Assessing Potential Sites	
	No comments
03 Knowledge Quarter	
Policies:	KQ1(h) – Add a target to reduce motor traffic.

04 Bloomsbury Campus Area	
Policies:	BC1(g,h) – Add a target to reduce motor traffic. BC2 – No comments.
4.10	Add wording that motor traffic must be reduced throughout the area, not just the part covered by the West End Project.

05 Camden Goods Yard	
Policies:	CGY1 (Area wide) – We support, especially (j,k) CGY2 (Morrisons) – We support, especially (e,g) CGY3 (Petrol Station) – We support, especially (a) CGY4 (100 CFR) – We support, especially (c,h) CGY5 (Juniper Cr) – Any redevelopment needs to be justified CGY6 (Network Rail) – We support, especially (b,e) CGY7 (Gilbeys Yard) – Any redevelopment needs to be justified CGY8 (Camden Lock Market) – We support, especially (e)
Fig 5.2	These aspirational routes must be made a high priority.
5.20	We agree with the statement and the priorities expressed. This is a key statement and should not be diluted.
5.33, 5.34	Fully agree with priority statement and that motors should only approach from Chalk Farm Road.
5.36, 5.39	Include a cycle route onwards to Regents Park Road. There is some inconsistency here and in subsequent sections – for example 5.95 includes cyclists but other sections do not.
5.41, 5.42	Agree that buses are too intrusive and occupy too much space and that taxis should not pick up at supermarket site.
5.50	Fully support improvements to Juniper Crescent/CFR junction.
5.53, 5.60	We fully support a new link to Chalk Farm Road.
5.74	We support a link but it should include a cycle route onwards to Regents Park Road (see 5.95). Add “and cyclists”.
5.83, 5.84	We support a link to Regents Park Road, should explicitly mention a cycle route.
5.95	Good to see cyclists mentioned!
5.106	Concerned about “intensify the market uses” as it is overcrowded already.
5.111	Agree that circulation of people needs to be carefully managed.

06 Camley Street and St Pancras Way	
Policies:	CSP1 (Area) – We support especially (c,f) CSP2 (120-136 Camley St) – We support especially (c) CSP3 (104-114 Camley St) – We support especially (f) CSP4 (ATS Site) – We support especially (b,c) CSP5 (St Pancras Hosp) – We support CSP6 (Shorebase Access) – No comments CSP7 (Other Sites) – No comments
6.7, 6.8	We agree that “Walking and cycling routes across the area are not accessible and/or difficult to interpret and navigate.”
6.16	Good to see recognition that this is a major cycle route and that improvements are badly needed. Improvement of the bridge underpass is critical (see CSP2(c)) - wording should be strengthened.
6.40	E-W link should include cycles as well as pedestrians.

07 Holborn and Covent Garden	
Policies:	HCG1 (Area) – We support especially (f,g) HCG2 (Former Central St Martins) – We support HCG3 (1 Museum Street) – No comments HCG4 (134-149 Shaftesbury Avenue – No comments HCG5 (Other Areas) – No comments
7.12	Good to see reference to Holborn Liveable Neighbourhood Scheme
7.22	Should refer to the proposed closure of Procter Street as part of the Liveable Neighbourhood Scheme.

08 Kentish Town Area	
Policies:	KT1 (Area) – We support, especially (e,f) KT2 (Regis Road) – We support, especially (d-h) KT3 (Murphy Site) – Qualified support, especially (c-f) but see 8.44 below KT4 (KT Police Station) – We support, especially (b) KT5 (369-377 Kentish Town Road) – We support, especially (b) KT6 (Kentish Town Fire Station) – No comments KT7 (Highgate Centre) – No comments
8.12	This is very important. Given the constraints imposed by the railway lines and the lack of space on adjacent roads, the provision of safe, quiet routes through the site for cyclists and pedestrians is critical.
8.15	We support this.
8.30	This is critical. The site currently forms a barrier and the opportunity exists to massively increase permeability.
8.44	Key paragraph but must include a cycle route as well as a pedestrian route.
8.55	Very welcome proposal to link Holmes Road and Regis Road.
8.60	A pedestrian and cycle link from Kentish Town Road is a key part of the adjacent Murphy's site development and must be safeguarded.
8.61	Road layout has changed and this may no longer be relevant.

09 West Hampstead Interchange Area	
Policies:	WHI1 (Area) – We support, especially (e,f). But needs more explicit mention of opportunities to improve West End Lane and Finchley Road for pedestrians and cyclists. WHI2 (O2 Centre) - We support, especially (d,f,g). WHI3 (13 Blackburn Road) – No comments WHI4 (188-190 Iverson Rd) – No comments WHI5 (Other Areas) – No comments
9.7	We support this
9.18, 9.19	We support these
9.21	We support this

10 Individual Development Sites

<p>Policies:</p>	<p>IDS1 – We support, especially (e,f) IDS2 – We support, especially (a) IDS3 – No comments IDS4 – Add policy to jointly fund a cycle and pedestrian crossing of Camden Road to link to Rochester Square and planned cycle route CFR2. IDS5 – No comments IDS6 – Add that space should be released to the public domain on Kentish Town Road to allow room for widened pavements and a protected cycle route (see also comments on IDS8). IDS7 – No comments IDS8 – (a) Space should be released to the public domain on Kentish Town Road to allow room for widened pavements and a protected cycle route. IDS9-10 – No comments IDS11 – (c) and (d) should emphasise that the streets should be for pedestrians and cyclists IDS12 – No comments IDS13 – (d) and (e) should emphasise that the streets should be for pedestrians and cyclists IDS14 – (c) include a route from Fleet Road to Rosslyn Hill for pedestrians and cyclists IDS15 – No comments IDS16 – We support, especially (i) IDS17 – No comments IDS18 – (c) add “for pedestrians and cyclists” IDS19 – We support, especially (g)</p>
<p>10.8 10.16, 10.19 10.38 10.54 10.59 10.80 10.114 10.131 10.142 10.159 10.160 10.177 10.187</p>	<p>Howland Street is a major cycle route and needs improvement. Fully support these permeability improvements. Include cycle and pedestrian link between Rochester Road and Rochester Square Stucley Place - consider cycle access e.g. via two-way cycle tracks on Hawley Crescent Widening footways in KTR at the expense of carriageway space would make it even worse for cycling. So this should read “The Council also wish to see pavements widened along Kentish Town Road by moving back the building line” We agree; this is an important policy. Make it explicit that these routes should be for pedestrians and cyclists. Make it explicit that these routes should be for pedestrians and cyclists. Add paragraph emphasising the pedestrian & cycle permeability routes shown in Figure 10.14. We support this. Add “investigate opportunity to combine this with a safe crossing of the Euston Road for cyclists”. We support this, especially the N-S and E-W routes shown on the map. We support this.</p>

Please acknowledge receipt of this response. We would be happy to discuss any aspect of our comments; contact details are below.

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