

King's Cross Central

Planning Statement

On behalf of  
Argent St George,  
London and Continental  
Railways and Exel plc

May 2004

ARGENT · ST · GEORGE





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## EXECUTIVE SUMMARY

This document is the planning statement submitted on behalf of Argent St. George, London & Continental Railways and Exel plc (the applicants) in relation to the two planning applications submitted for King's Cross Central (KXC).

The two applications (one for the Main Site and one for an area known as the Triangle Site) relate to a sustainable, high density, mixed use development on a previously developed site designed to shape a vibrant and distinctive urban quarter for London and facilitate wider regeneration. A detailed Development Specification including a series of Parameter Plans is formally part of each application.

*The planning application for the Main Site is described in para 1.17 and the description of development in para 1.19. A schedule of the total floorspace is provided in Table 1 (page 10) and the application site is described in paras 1.23-1.26. A description of the Parameter Plans is given in para 1.27.*

*The planning application for the Triangle Site is described in 1.38 and the description of development in para 1.41. The application site is described in para 1.44 and Table 2 (page 17) provides a schedule of the total floorspace. A description of the Parameter Plans is given in para 1.51.*

The KXC site extends to 27.2 ha within the London Boroughs of Camden and Islington. The majority of the development would fall within that part of Camden designated as the King's Cross Opportunity Area which is the subject of a number of planning policies.

*Plan A (referred to in para 1.1) shows the extent of the KXC site.*

The applications include the vast majority of land designated as an Opportunity Area and respond to the policies which promote comprehensive development and regeneration on a significant scale.

The applications seek an element of flexibility to adjust the balance of land uses over time and to phase development in different ways accordingly to market opportunities and other factors. However, the applications contain a significant amount of detail and are supported by a substantial level of supporting documents and studies.

*The list of supporting documents is provided in para 1.10.*

Four applications for listed building consent and four applications for conservation area consent have been submitted in parallel and each of these has its own supporting statement.

These proposals are described in para 1.33.

The future of the King's Cross 'railway lands' (as this site has been described) has been under debate for over 30 years. The major development and regeneration sought has not occurred in part for economic reasons but also because of the uncertainty over the alignment and delivery of transport projects, such as the Channel Tunnel Rail Link (CTRL) which will now terminate at St. Pancras and due to be completed by 2007.

*The recent site history of KXC is set out in Section 2.*

The physical, social, economic and environmental “framework” that underpins these current proposals has evolved since 2000. The proposals submitted have both informed, and been informed by, the evolution of planning policy and guidance for the KXC site.

The proposals have also been subjected to extensive public consultation exercises which included a wide range of stakeholders in the process. In this way, the applicants have responded to the expressed desire of local authorities and local communities to see major development and regeneration started and completed as soon as possible to overcome the problems and uncertainties which have blighted the KXC site in the recent past.

*The approach to researching testing and refining the physical, social, economic and environmental framework is set out in Section 3 in chronological order.*

*The extensive consultation exercises are referred to in para 3.2 and paras 4.52-4.59.*

The development plan for the Main Site comprises the recently adopted Chapter 13 of the Camden UDP which relates to the King’s Cross Opportunity Area, other policies in the Camden UDP (adopted March 2000) and the more recent policies in Alteration No.2 - Affordable Housing and Mixed Use Policies, adopted January 2004. The development plan for the Triangle Site comprises the same documents, plus the Islington UDP (adopted June 2002). The London Plan (adopted February 2004) is a material policy consideration. Although the London Plan supersedes RPG3, the latter remains an important part of the historical policy context in relation to the evolution of the proposals for the King’s Cross Opportunity Area. The Planning and Development Brief for the King’s Cross Opportunity Area prepared and adopted jointly (December 2003/2004) interprets planning policies in detail.

*The way in which the KXC Parameter Plans provide a high quality ‘masterplan’ sought by the Brief is described in paras 7.49-7.78.*

Development plan policy and the “plan led approach” is an important basis for development control purposes and the consideration of these planning applications. In this regard, the applicants have been able to formulate their proposals in London with emerging development plan policies for the King’s Cross Opportunity Area and the preparation of the Planning and Development Brief. The London Plan and its strategic policies for the King’s Cross Opportunity Area have also evolved during this period with input from a range of stakeholders, including the applicants.

Clearly, there has been a considerable level of public consultation during the evolution and review of the development plan policies and Planning and Development Brief. The applicants have also engaged in extensive consultation exercises over four distinct stages.

*Relevant documents here include:*

*July 2001: Principles for a Human City*

*October 2001: King’s Cross – Towards an Integrated City*

*December 2001: Parameters for Regeneration*

*June 2002: King’s Cross – Camden’s Vision*

*September 2002: A Framework for Regeneration*



*June 2003: Framework Findings*

A full Statement of Community Engagement for KXC has been submitted as part of the overall suite of supporting documentation and this summarises the applicants' consultation process and findings. Overall, the proposals for KXC have had the benefit of being drawn up in parallel with the emerging, now approved development plan policies and with the benefit of a considerable level of public consultation.

The policy assessment contained within this statement demonstrates that the applicants' proposals are consistent with all the strategic and local policies for the King's Cross Opportunity Area adopted in Chapter 13 of the Camden UDP.

Some of the key conclusions of this assessment are that:

- The proposals embody many of the key themes of Government planning guidance.
- The proposals meet common sustainability and regeneration objectives of Central, London-wide and local Government whilst addressing aspirations raised by local people.
- The proposals could deliver around 30,000 new jobs, of which 40% could be taken up by local people within a defined "Central Impact Zone" and "Wider Impact Zone" with the right employment brokerage and training measures in place. The proposals meet the employment and regeneration policies.
- Together the applications provide for more than twice the net increase of housing units (1000 min) sought under Policy KC4. The proposals provide studio, one bedroom, two bedroom, three bedroom and four bedroom accommodation, including homes suitable for families, therefore meeting the housing policies.
- The proposals submitted represent the appropriate optimum development response to all relevant planning and design considerations.
- The proposals will help balance the tenancy profile in the area by introducing a range of market, intermediate, key worker and affordable low cost housing. In particular, it would provide the basis for a local 'housing ladder' in which a choice of tenure and price is available to local residents.
- The proposed scale and nature of retail and leisure facilities would not threaten the viability and vitality of neighbouring centres, in accordance with Government guidance contained in PPG6 and draft PPS6 relating to Town Centres and Retail Development and the shopping policies prevailing in the UDPs. King's Cross is acknowledged to have the best public transport accessibility in London and the King's Cross Opportunity Area is recognised by policy to be a suitable location for uses that are major generators of travel demand such as shopping and leisure.
- The proposed development would contribute positively to an integrated package of improvements to the local transport arrangements, thereby minimising car use and meeting relevant transportation policies.

- The proposed car parking ratios comply with UDP standards and represent the minimum necessary for the development. Many homes would be “car free”.
- The proposals represent the right balance between the protection of heritage and other social and economic considerations and meet relevant heritage policies in the Camden UDP. The proposals (and the detail they contain) also take very full account of and are consistent with, PPG15.

The overall conclusion is that the proposed development meets the requirements of the King’s Cross Opportunity Area policies for a sustainable, high density, mixed use scheme providing employment and other opportunities in a strategic and borough wide context. In addition, the scheme provides a significant positive contribution towards the objectives of housing, leisure, townscape, design, heritage, regeneration, integration and transportation policies.

## 1.0 INTRODUCTION

- 1.1 Argent St George, London and Continental Railways (LCR) and Exel plc (hereafter referred to as “the applicants”) have submitted applications in May 2004 for permission to carry out a mixed use development at King’s Cross Central (KXC). The application sites extend to 27.2 ha within the London Boroughs of Camden and Islington. The extent of the KXC site is shown on Plan A and an aerial photograph of the site and the surrounding area included as Plan B.
- 1.2 The majority of the development would fall within that part of Camden designated as the King’s Cross Opportunity Area (KCOA). Indeed, the applications include the vast majority of the land designated as KCOA and accordingly offer comprehensive development and regeneration on a significant scale.
- 1.3 Indeed, the applicants consider that King’s Cross presents one of the most exciting and significant development and regeneration opportunities within London, the UK and Europe. Together with places such as New York and Tokyo, London is one of few world cities and King’s Cross is an important existing transport node within London. Current public transport infrastructure provision and improvements taking place will make King’s Cross the most accessible location within London, the European financial centre and one of the three world cities, a major gateway and place of arrival.
- 1.4 King’s Cross is already served by six underground lines: the deep level Northern, Piccadilly and Victoria lines and the sub-surface Circle, Metropolitan and Hammersmith and City. King’s Cross also benefits from Thameslink and the East Coast Main Line whilst the Midland Main Line is adjacent at St. Pancras Station. It will also shortly be served by the Channel Tunnel Rail Link (CTRL) which will provide international trains as well as new high speed domestic services to and from Kent. King’s Cross therefore has an important role to play in maintaining and enhancing London’s position as a world city. The opportunity is to create a dense, vibrant urban quarter, a place with distinctive identity. Accordingly, the KXC proposals are for high density, mixed use development, designed to shape a vibrant and distinctive urban quarter for London and facilitate wider regeneration.
- 1.5 Figure 1 (set out at Appendix 1) outlines the structure of the initial applications for the KXC development, and their interaction with the supporting documentation. The main elements of Figure 1 are described below:

### The Applications' Package

- 1.6 The KXC development is the subject of two planning applications:
- i) for outline planning permission submitted to the London Borough of Camden, in relation to the “Main Site”; and
  - ii) for outline planning permission, submitted jointly to the London Borough of Camden and the London Borough of Islington, in relation to the “Triangle Site”.

Both are described in greater detail below.

- 1.7 The two outline planning applications exclude the Channel Tunnel Rail Link (CTRL) embankment, currently under construction. They also exclude an area of land within the applicants' control, known as the "linear land". The linear land is a discrete site, separated from the Main Site and Triangle Site by the (CTRL) embankment, the reconfigured Camden Transport Depot and various aggregate/concrete operations. It forms part of the Camden KCOA but is likely to accommodate very different uses and activities compared to the Main Site and Triangle Site, as recognised in the recently adopted (December 2003/January 2004) Camden and Islington Joint Planning and Development Brief for the KCOA and Triangle (see Section 7; the linear land is referred to in the Brief at para 3.4.34). The applicants intend to bring forward a scheme for the linear land shortly, following the completion of ongoing feasibility studies.
- 1.8 Each of the two planning applications includes a Development Specification. The Development Specifications define and describe the principal components of the developments applied for. Each of the Development Specifications includes and describes a series of Parameters Plans which address and fix (in some cases within defined limits of deviation) various elements of the proposed development.
- 1.9 The Development Specifications and their Parameters Plans form part of each of the two outline planning applications and are addressed in detail later in this Planning Statement. It is important to note at the outset, however, that the structure and format of the two outline planning applications, and the planning strategy in respect of the linear land, accord fully with paras 4.1.4 - 4.1.11 of the Joint Planning and Development Brief.
- 1.10 The two planning applications are accompanied by a number of other supporting documents and studies. In the list that follows, the paragraph number indicates the location in this Statement where the content of that document is summarised:

Documents that Deal with the Evolution of the Proposals:

Past Evolution

- i) An Urban Design Statement (1.39);
- ii) A Statement of Community Engagement (4.54);

Future Evolution

- iii) Urban Design Guidelines (7.61);
- iv) Initial Conservation Plans (for retained heritage buildings), Main Site only (4.144);
- v) Triangle Explanatory Statement (Triangle Site only) (6.24);

Strategy Documents that Deal with Future Implementation:

- vi) An Implementation Strategy (4.80);
- vii) An Environmental Sustainability Strategy (4.51);
- viii) A Public Realm Strategy (4.63);
- ix) A Code of Construction Practice (4.49);
- x) A Regeneration Strategy (4.30, 4.38);

Documents that Deal with Policy and Assessment Issues:

- xi) An Environmental Statement (4.48);
- xii) A Transport Assessment together with a Green Travel Plan (4.46, 4.120);
- xiii) A Retail Impact Assessment (4.99); and
- xiv) This Planning Statement.

1.11 The documents listed in para 1.10 above are not formally part of the two outline planning applications but are submitted in support of them. Together, the suite of supporting documents is intended to:

- i) describe the context and thinking that lie behind the submitted development proposals;
- ii) explain the way in which the applicants would approach the implementation of the development;
- iii) define and explain the significant regeneration and other benefits, which the proposed development would bring about;
- iv) address statutory requirements in relation to Environmental Impact Assessment (EIA);
- v) incorporate good practice requirements, for example in relation to Green Travel and construction practice;
- vi) address various planning policy and assessment issues, for example the impact on transport networks; and
- vii) generally assist the local planning authorities (LPAs) in evaluating and determining the applications.

1.12 As discussed later in Section 7, these supporting documents take account of, and respond fully to, paras 4.13 – 4.15 within the Joint Planning and Development Brief, which sets out the Technical Assessments, Supporting Information, Guidelines, Strategies and Plans sought by the Councils as part of the planning applications 'package'.

1.13 The applicants invite the LPAs, should they grant planning permission, to impose (a) condition(s) that requires all future submissions for approval of reserved matters to conform strictly with the approved development parameters of the relevant Development Specification, including its Parameter Plans (for example, see Main Site Development Specification, para 6.1).

1.14 Furthermore, as phases and buildings come forward within the Main Site, each application (or group of applications) for approval of reserved matters would be accompanied by an illustrative built-out plan for the whole site, which would show areas already permitted/built, the buildings for which approval of reserved matters is sought and how the remainder of the site would be likely to come forward later (Main Site Development Specification para 6.2). The submission of up-to-date illustrative build out plans, at each key stage of the development is intended to:

- i) help the LPA(s) understand how each phase of development might shape the next; and
- ii) give them confidence that the approval of reserved matters would not prejudice the satisfactory completion of the relevant development zone(s), in line with the original planning permission.

- 1.15 The development programme is likely to take at least 12-15 years to complete (paras 5.5-5.12 of Implementation Strategy). Accordingly, the two outline planning applications seek an element of flexibility to adjust the balance of land uses over time and to phase development in different ways, according to market opportunities and other factors. The need for this flexibility is very important as it allows scope to respond to uncertainties and risks during the development programme, as recognised in the Joint Planning and Development Brief:

*“These aims have to be reconciled with the need for flexibility given the scale and complexity of the site and the very extended period over which development is likely to take place, perhaps 12-15 years. That period is likely to see significant changes in social and economic circumstances, not least because of the anticipated overall growth predicted for London over that time. The site presents complex challenges, and it cannot meet an unlimited number of aspirations and objectives. This Brief needs to contain sufficient detail to shape development proposals, but only seeks details in development applications where they are necessary and sufficient to this stage of assessment. Much detail will not come forward until later in the planning process.”*

- 1.16 Ultimately, major development at King’s Cross will only be deliverable if it proves to be economically viable and the Brief (quoted above) is right to acknowledge that the site presents complex challenges and cannot meet an unlimited number of aspirations and objectives. Any speculative development involves a number of significant risks (including, for example, planning risks, engineering risks, construction risks, letting risks, finance risks, etc.) and KXC is no exception. It is also a large, previously-developed site - one that will require very substantial investments to be made in new infrastructure. The Implementation Strategy sets out the applicants’ approach to these issues and explains:

- that the applicants, the LPAs and local communities have a common interest in facilitating, starting and completing development as soon as possible;
- how the submitted development proposals reflect this ‘common interest’; and
- how the applicants intend to achieve it.

### Planning Application for “Main Site”

- 1.17 The outline planning application for the Main Site seeks approval, at this stage, for:
- i) Means of access and circulation (to the extent that access and circulation are defined and described within the submitted Development Specification);
  - ii) Siting (to the extent that siting is defined and described in the submitted Development Specification); and
  - iii) Landscaping (to the extent that landscaping is defined and described in the submitted Development Specification).
- 1.18 The application does not seek any approval, at this stage, for the detailed design or external appearance of any new buildings. Nonetheless, the applicants have submitted an Urban Design Statement and Urban Design Guidelines for the

proposed development. They explain the context within which design details would come forward later, as applications for the approval of reserved matters by the LPA.

## Development Content

1.19 Specifically, the planning application for the Main Site seeks permission for

*'Comprehensive, phased, mixed use development of former railway lands within the King's Cross Opportunity Area, as set out in the submitted Development Specification. The development comprises business and employment uses within the B1 use class; residential uses, serviced apartments and hotels; shopping, food and drink and professional services within A1, A2 and A3 use classes; the full range of community, health, education, cultural, assembly and leisure facilities, within the D1 and D2 use classes; multi storey and other car parking; re-erection of the linked triplet of gas holder guide frames to enclose new residential and other development, on the site of the Western Goods Shed; re-erection of the guide frame for gas holder no.8, alongside the re-erected triplet, to enclose new play facilities and open space; re-location of an existing district gas governor; works of alteration to other existing buildings and structures, to facilitate their refurbishment for specified uses; new streets and other means of access and circulation; landscaping including open space; new bridge crossings and other works along the Regent's Canal; the re-profiling of site levels; and other supporting infrastructure works and facilities.'*

1.20 Table 1 sets out the overall total floorspace proposed for the site as a whole:

- i) Up to 238,545 sq m to the south of the Regent's Canal;
- ii) Up to 479,730 sq m to the north of the Regent's Canal;
- iii) Up to 718,275 sq m in total.

1.21 Table 1 within the Development Specification further defines maximum floorspace figures, for each category of land uses. The aggregate total of these maximum floorspace figures, for all categories of land uses (896,470 sq m), exceeds the overall total floorspace applied for (718,275 sq m). This is because the application seeks permission for 'up to' the maximum floorspace specified for each category of land uses, to provide important flexibility over the content of the development. The application provides scope, therefore, to respond to changing needs and circumstances, over the course of the implementation of the project.

1.22 Whatever floorspace mix is eventually provided, within the various 'up to' maxima applied for, the overall total floorspace limits stated in Table 1 and summarised at para 1.20 above would not be exceeded.

Table 1: Total Floorspace Proposed within the King's Cross Central Main Site

	Total Floorspace Applied for (sq m)	Maximum amount of floorspace, within the total applied for, that may be developed as (sq. m):								
		Business & Employment (B1)	Residential	Hotels (C1)/ Serviced apartments	Shopping/ food & drink (A1/A2/A3)	Uses within D1 (see Note 1)	Cinemas	Uses within D2 (see Note 2)	Multi Storey Car Park	Other (see Note 3)
South of Regent's Canal	238,545	219,010	3,900	32,625	15,460	3,180	0	975	0	525
North of Regent's Canal	479,730	267,270	172,975	14,600	30,465	72,585	8,475	30,575	23,850	0
TOTAL	718,275	486,280	176,875	47,225	45,925	75,765	8,475	31,550	23,850	525

<sup>1</sup> D1 uses include community, health, education and cultural uses such as museums

<sup>2</sup> D2 (Assembly and Leisure) uses include concert halls, dance halls, nightclubs, casinos, gymnasiums and other sports/recreation areas including cinemas, which are also identified separately.

<sup>3</sup> 'Other' refers to service entrances and access to London Underground Ltd (LUL) facilities.

<sup>4</sup> All figures are gross external.

<sup>5</sup> The floorspace figures given exclude infrastructure and utility elements which would form part of the development and for which planning permission is sought, for example substations, transformers, waste storage and recycling facilities.

<sup>6</sup> Other than the Multi Storey Car Park, the floorspace figures exclude parking.

<sup>7</sup> The floorspace figures exclude new basement floorspace within buildings. New basement floorspace constructed within buildings as part of the development would be used for plant, services and equipment, storage and parking. The floorspace figures exclude rooftop plant

<sup>8</sup> The figures exclude the district gas governor (which would be relocated within the site to development zone V).



## The Application Site

- 1.23 The Main Site lies between the Euston Road, St. Pancras Station, the Midland Main Line, the alignment of the new CTRL, York Way and King's Cross Station. The site includes Wharf Road, Goods Way, Battle Bridge Road and (parts of) Pancras Road and York Way. The site includes a number of listed buildings and structures. Additionally, much of the site falls within the Regent's Canal Conservation Area and the King's Cross Conservation Area.
- 1.24 At present, the majority of the land to the south of the Regent's Canal is used for CTRL/LUL construction purposes, for temporary construction roads and for car parking associated with King's Cross Station. The Great Northern Hotel, German Gymnasium, Stanley and Culross Buildings have been vacated and secured due to construction work on adjacent sites. A small area is occupied by a district gas governor facility. To the north of the gas governor stands the listed gas holder no.8 with the dismantled pieces from a linked triplet of gas holders (also listed) stored alongside. Part of the site, between Goods Way and the Regent's Canal is currently a filling station.
- 1.25 Immediately to the north of the Regent's Canal, the 'Goods Yard' comprises a collection of former railway and industrial buildings, some of which are presently occupied by a range of interim/short term uses. The main buildings are used for a variety of storage, distribution and leisure uses including night-clubs. A number of buildings, including the Fish and Coal offices and the Midland Goods Shed offices, are disused/vacant.
- 1.26 The land to the east of the Midland Goods Shed and to the north of the main 'Goods Yard' buildings is currently used for CTRL construction purposes and concrete batching plants.

## Parameter Plans

- 1.27 As mentioned earlier in para 1.8 of this Planning Statement, the Development Specification for the Main Site includes (and describes) a series of 18 Parameters Plans. A selection of the Parameters Plans are described briefly below. Together, they more than meet the "masterplan" requirements identified at para 4.1.2 of the Joint Planning and Development Brief. They also address all of the "development parameters" identified at para 4.1.11 of the Joint Brief:

Parameter Plan	Title	Comments
KXC001	Planning Application Area	This shows the planning application area and the fact that it falls entirely within the London Borough of Camden.
KXC004	Principal Public Realm Areas	This defines the principal public realm areas that are proposed as part of, and form the underlying 'framework' for the site's comprehensive development.
KXC005	Development Zones	This defines the boundaries of the development zones (A to V) within which: <ul style="list-style-type: none"> <li>(i) new buildings and structures would be erected;</li> <li>(ii) the gas holder guide frames would be relocated and re-erected; and</li> <li>(iii) specified works of alteration would be carried out, to existing (retained) buildings and structures, to facilitate their refurbishment for specified uses as part of the proposed comprehensive development.</li> </ul>
KXC007	Access and Circulation	This fixes the various access and circulation routes that are proposed, as part of the site's comprehensive development. Each of the routes and features shown would be retained and/or developed in the form and location identified on the parameter plan and described in Annex C of the Development Specification. The parameter plan also provides information about the 'grain' of the development areas i.e. the future pattern and size of blocks and streets.
KXC008	Upper Floor Land Uses Along Street Elevations	This defines and describes the upper floors land uses along the principal street elevations within the development. It therefore demonstrates the true mixed use nature of the development.
KXC009	Ground Floor Land Uses Along Street Elevations	This fixes the ground floor land uses along the principal street frontages within the development. It therefore demonstrates the true mixed use nature of the development and confirms that the development would have active uses, animating the principal streets.
KXC011	Demolition and Relocation	This highlights the parallel applications that

Parameter Plan	Title	Comments
	Proposals for Listed Building and Conservation Area Consent	have been submitted (see para 1.33 below ) to undertake demolition and other works that are necessary to deliver the comprehensive development of the site.
KXC013	Development Massing	This governs the massing of new development. This parameter plan confirms that the great majority of the total floorspace applied for would be constructed below a height of 30/31 metres, as measured from finished ground floor levels. Overall no more than 20.5% of the total floorspace applied for may be constructed above this level.
KXC014	Maximum Building Heights	This fixes the maximum heights of built development within each part of the site in terms of metres Above Ordnance Datum (AOD). No new buildings, plant or other built development would exceed the identified height limits shown on the parameter plan.
KXC015	Strategic Views	This shows the two Strategic Views, designated and protected in strategic planning guidance, that affect the site (namely from Parliament Hill to St. Paul's Cathedral and from Kenwood House to St. Paul's Cathedral). This plan, along with the maximum heights plan KXC014 demonstrate that the development would not adversely affect Strategic Views of St Paul's Cathedral.
KXC018	Utilities	This shows the location and connection strategy for various site utilities, for example water, drainage, power and gas. It confirms the investment that will be necessary to underpin multi-phase development at King's Cross Central. This investment would be invisible to most local residents but could facilitate the earlier redevelopment of other vacant or underused sites locally and remove the blight effect and hazard threats currently associated with the former railway lands (section 4.3.1 of the Regeneration Strategy).

1.28 These Parameter Plans address both new-build development and those heritage buildings that the applicants propose to retain: the Great Northern Hotel, the German Gymnasium, the southern Stanley Building, the Fish and Coal offices and Wharf Road Arches, the Granary building, together with its flanking offices and East and West Transit Sheds, the Midland Goods Shed and adjoining Handyside Canopies, Regeneration House, the

Eastern Coal Drops, the Western Coal Drops and the four listed gas holder guide frames, which would be relocated and re-erected to the north of the Regent's Canal.

- 1.29 The outline planning application for the Main Site seeks planning permission to undertake works of alteration to these existing buildings and structures, to facilitate their refurbishment for specified uses as part of the proposed comprehensive development. It also, as indicated above, seeks planning permission to relocate and re-erect some existing buildings and structures within the King's Cross and Regent's Canal Conservation Areas.
- 1.30 The works of alteration and relocation for which planning permission is sought are summarised at paras 3.6 – 3.10 of the Development Specification, with more detail at Annex E of that document. The works proposed are effectively preparatory, i.e. they would be required to prepare the buildings, to facilitate their refurbishment for specified uses, as part of the proposed comprehensive development.
- 1.31 Some of the 'Annex E' works are also the subject of initial applications for listed building or conservation area consent, submitted alongside the planning application. These applications are described below. Other 'Annex E' works would need to be the subject of future applications for listed building or Conservation Area consent (to be submitted once the future use and refurbishment plans for individual buildings are further advanced).

## Heritage Applications

- 1.32 The Main Site falls within two Conservation Areas and there are a number of listed buildings. In order to deliver the development shown on the parameter plans, in particular the proposed new framework of public routes and spaces shown on Parameter Plan KXC004, demolition or alteration of some listed buildings and other buildings within the conservation areas is required. In order to achieve this, four listed buildings and four Conservation Area applications have been submitted in parallel. These applications are described in brief below, with further information provided within seven Supporting Statements prepared and submitted to address PPG15 and other relevant planning policies.
- 1.33 The demolition and relocation proposals to which these applications relate (all within the Main Site) are shown on Parameter Plan KXC011 which identifies:
- i) Those demolition proposals for which the applicants have submitted parallel applications for Conservation Area consent:
    - a) Demolition of the non-listed Culross Building;
    - b) Demolition of the non-listed Western Goods Shed so as to allow the re-erection of the (already dismantled ) gas holder triplet guide frames;
    - c) Demolition of the non-listed Plimsoll Viaduct;
    - d) Demolition of various other non-listed buildings and structures, including the 'Laser' building between the Eastern Coal Drops and Western Transit Shed; the existing Exel bridge over the Regent's Canal; the 'bakery' building and fence to the north of the Western Coal Drops; the existing filling station at the corner of Goods Way and York Way; the existing gas governor; existing substation, storage and security buildings; sections of wall around the former gas works site; sections of wall and fencing around the Granary; structures along the Regent's Canal; a section of wall adjacent to Camley Street Natural Park; a number of telegraph poles; and structures associated with the existing King's Cross Station car park.

- ii) Those proposals for which the applicants have submitted parallel applications for listed building consent:
  - a) Demolition of the northern Stanley Building;
  - b) Dismantling of gas holder no. 8 so as to relocate and re-erect its guide frame within development zone N, to the west of the site proposed for the gas holder triplet (that site being the Western Goods Shed; see above);
  - c) Demolition of the most northerly bay (one bay only) of the East Handyside Canopy; the removal of the buttress wall that runs northward from the north east corner of the Canopy; and demolition of the most northerly bay (one bay only) of the West Handyside Canopy; and
  - d) Demolition of extensions to the Great Northern Hotel. The applicants seek to demolish the basement (3 offices) and ground floor extension (kitchens, toilet and office) on the south-western façade and the fire escape which crosses the extension; demolish the basement (storage) and ground floor extension (ladies toilet) on the northern façade; remove the railings along the south-western and northern sides of the hotel; cover the lightwell around the south-western and northern sides of the hotel; and renovate the affected facades so as to match, as closely as possible, the existing fabric of the hotel and the new paving surfaces around it.

1.34 These works are necessary to deliver the comprehensive development of the Main Site, as defined and described in the submitted Development Specification and the substantial benefits it would bring: re-erection of the guide frames for the gas holder triplet and gas holder no.8; the opening-up and economic re-use of other retained historic buildings; economic regeneration of the area generally; and the enhancement of its environment.

1.35 This Planning Statement cross-refers to the demolition and other works, for which the applicants seek listed building and conservation area consent, but it does not describe or define them in detail. Each set of works has its own (Planning) Supporting Statement and these address planning policy issues comprehensively.

## Highways

1.36 The planning application for the Main Site is accompanied by drawings that show indicative proposals for the existing adopted highways of Pancras Road, Goods Way and York Way. These indicative highways drawings [NB. Entitled "Illustrative Highway Proposals"; the words "indicative" and "illustrative" have been used interchangeably] do not form part of the planning application and have been submitted to:

- i) Demonstrate that satisfactory highway access can be provided to and from the site in accordance with the means of access and circulation sought as part of the application;
- ii) Demonstrate that the development can be carried out without prejudicing the safe and efficient operation of the highway; and
- iii) Indicate a highway configuration that makes proper provision for pedestrians, cyclists, private cars and other users, including the proposed Cross River Tram.

1.37 In due course, following the grant of planning permission, the applicants would agree detailed schemes for Pancras Road, Goods Way and York Way, with the relevant highway authorities and would enter into an agreement (or agreements) under section 278 of the

Highways Act.

## Planning Application for the Triangle Site

- 1.38 This is an outline planning application, which seeks approval for:
- i) Means of access in full; and
  - ii) Siting (to the extent that this is defined and explained within the Development Specification for the Triangle Site).
- 1.39 The application does not seek approval, at this stage, for the detailed design or external appearance of any buildings, or for landscaping. Nevertheless, the Urban Design Statement and Urban Design Guidelines submitted in support of the King's Cross Central proposals as a whole address the Triangle Site, and an Explanatory Statement specifically for the Triangle Site (TES) has also been produced, to explain the context for these proposals, their design evolution and the key development issues that relate specifically to the Triangle Site.
- 1.40 The TES complements and amplifies information provided in the suite of supporting documents that are submitted in support of both applications, to assist the London Borough of Islington in particular.

## Development Content

- 1.41 The outline application proposes a scheme for:
- "Mixed use development of part of the former railway lands within the Camden King's Cross Opportunity Area and the Islington Area of Opportunity, as set out in the Development Specification. The development comprises residential; shopping, food and drink and professional services within the A1, A2 and A3 use classes; a health centre fitness centre (use class D2) incorporating medi-centre facilities, a creche and community facilities (use class D1); amenity and open space; habitat area; recycling and other ancillary uses; parking; highway works to provide access; and other supporting works and facilities."*
- 1.42 The overall total floorspace proposed within the development is 24,000 sq m. A breakdown of this floorspace is provided at Annex A of the submitted Development Specification and reproduced here in Table 2.
- 1.43 The site itself slopes upwards from north to south along York Way. This informs the way the site is proposed to be developed, as explained at paragraph 1.48 below: the street level at the north end differs from the street level at Randell's Road.

Table 2: Total Floorspace Proposed within the King's Cross Central Triangle Site

Use	Total Floorspace Applied for (sq.m)	Notes
Residential	up to 18,000	To provide up to a maximum of 250 dwellings in Blocks A and B.
Retail	up to 2,500	Within Block B and beneath amenity space. All units to have frontage to York Way.
D1/D2 uses	up to 3,500	The application seeks permission for specific uses within Block C including a sports hall; swimming pool; other indoor sports, fitness and recreation facilities including a gymnasium; medical/health facilities; crèche/day nursery facilities; and day centre/public hall facilities.
TOTAL	up to 24,000	-

1. All figures are gross external.
2. The floorspace figures given exclude infrastructure and utility elements which would form part of the development and for which planning permission is sought, for example substations, transformers, waste storage and recycling facilities.
3. The floorspace figures exclude parking.
4. Up to 185 car parking spaces would be provided within the development. The overall maximum car parking/storage ratio for residential uses would be 0.5 spaces per unit (up to a maximum of 125 spaces). The remaining spaces (up to a maximum of 60 spaces) would serve the D1/D2 uses proposed. The proposed retail uses would have no dedicated parking at the completion of the development. However, in earlier phases, a proportion of the spaces applied for may be used for retail parking.
5. The floorspace figures exclude plant.

## The Application Site

- 1.44 The application site lies between York Way (as realigned by the CTRL works), the Thameslink 2000 rail line and the East Coast Main Line. The submitted plans do not, therefore, show the site as it appears today. Rather, they show the site extended to the west by the realignment of York Way, which results from the CTRL works. The site area in 2007 (when the CTRL works are due to be completed) will therefore be larger than that currently referred to as the Islington Triangle Site in the Islington UDP. The application is made for the larger site area, as the proposed development would not commence until after the completion of the local CTRL works, in particular the realignment of York Way.
- 1.45 At present (May 2004), York Way is elevated on a viaduct as it runs through the site. Once York Way is realigned, it will be at grade.
- 1.46 The site does not contain any existing buildings, and consists of railway embankments, disused railway sidings and vacant land in between. There is no existing floorspace on the site.
- 1.47 The key interaction between the Main Site and the Triangle Site is across York Way, on the Triangle Site's western boundary. To the east of the site, beyond the East Coast Line, the land uses are mainly residential and industrial, with nearby premises occupied by a concrete batching plant. To the north and north east the uses are also industrial, with the adjacent site being occupied by CTRL-related uses (the London West Portal Muster Area) which would share the proposed access to the site off York Way (see paragraph 1.49 below). Further to the north are the CTRL and North London rail lines.
- 1.48 The proposed development comprises three principal buildings, which would stand as separate structures at higher levels, but which would extend across the site at lower levels with a common basement level used for car parking (the submitted Development Specification provides a more detailed explanation). The land uses provided within the development are explained below. The extent of development and the interrelationships between the uses are described and explained in the submitted Development Specification, which includes Parameter Plans for the Triangle Site.

## Highway Proposals (Means of Access)

- 1.49 Vehicular access to the site is applied for in full. Access would be provided via a new road over the cut and cover tunnel for Thameslink 2000 forming a new junction off York Way. The currently proposed access to the adjacent CTRL London West Portal Muster Area would be removed, as part of the proposed works and the new access would then serve both sites.
- 1.50 The access to the site is fixed at this stage for several reasons:
- Technical solutions are limited due to the loading capacity on the Thameslink tunnel, the gradient of York Way and the need to maintain sight lines;



- The applicants have developed a technical solution that rationalises CTRL arrangements (providing access to the CTRL London West Portal Muster Area) and the need for new access for the Triangle Site, into a single junction that meets technical and urban design objectives;
- The access proposal complements the proposed access to the Main Site and avoids conflict with other access off York Way; and
- The access can be fixed without prejudicing the other parameters for this development or the design flexibility that they provide.

## Parameter Plans

1.51 The Triangle Site Development Specification has seven Parameter Plans, summarised below. These define the extent of development, the proposals for access, the disposition of various uses and maximum heights for each part of the proposal. The Development Specification has been framed to take full account of para 4.1.4 of the Joint Planning and Development Brief, which advises that:

*"...This application will need to include means of access and other development parameters to explain the relationship between the proposed development and development proposed in [adjacent] sub-areas..."*

Parameter Plans	Title	Comments
TS001	Planning Application Area	The plan confirms that the application site falls within both the London Borough of Camden and the London Borough of Islington, with the western boundary of the site formed by the CTRL realignment of York Way.
TS002	Post CTRL Site Layout and Levels	This shows the site layout and levels that are anticipated to exist upon completion and opening of the CTRL, prior to the commencement of the Triangle Site development. The plan shows the final layout of roads and the final disposition of the CTRL works that are currently under construction.
TS003	Site Access	This parameter plan shows the proposed access to the site (proposed in full). It also shows the CTRL access that would be removed.
TS004	Lower Ground/Parking Level	This plan shows the lowest level of built development.
TS005	Ground/Retail Level	This shows the second level of built development, and the one with the majority of street frontage. The main retail development would be located at this level, providing an active street frontage along York Way and at prominent corners.
TS006	Garden Level	This shows the next level up where the built development would appear as three separate blocks. Blocks A and B would be in residential use at this level and levels above. Block C would contain the health and fitness, medi-centre, crèche and related facilities. Maximum building heights are shown in metres Above Ordnance Datum (AOD).
TS007	Upper Levels	This shows a typical upper level for Blocks A and B, above the maximum height of Block C, indicating the variations in height across the development. The plan repeats the maximum heights for Blocks A and B in metres AOD.

## 2.0 RECENT SITE HISTORY

- 2.1 There has been a planning policy impetus for large-scale development on a strategic basis at King's Cross 'railway lands' for over 30 years. Despite this, major development and regeneration of the main site (King's Cross Central) has failed to happen, in part for economic reasons but also because of uncertainty over the alignment and delivery of transport projects.
- 2.2 British Rail submitted the first scheme before the 1960's but this was not progressed. In 1987, four developers were invited to submit plans to comply with requirements identified by British Rail. These requirements included provision for a low-level London Terminus for the CTRL at King's Cross. In 1988, the list of potential developers for the railway lands was reduced to two and final, revised submissions were invited.
- 2.3 In June 1988, the London Regeneration Consortium (LRC) was selected as the approved developer for the railway lands and Foster Associates was commissioned by LRC to prepare a masterplan.
- 2.4 In July 1988, British Rail lodged a Parliamentary Bill, to authorise the construction of a Channel Tunnel terminus at King's Cross. Select Committee hearings continued through 1989, 1990 and 1991, against a background of some uncertainty about the funding and viability of British Rail's plans.
- 2.5 Meanwhile, LRC had submitted an outline planning application for comprehensive development of the railway lands in April 1989. However, this planning application faced substantial opposition and was soon withdrawn. A second application was made in October 1989, providing further/revised proposals.
- 2.6 Protracted negotiations over the content of the scheme for the railway lands continued. In 1992 Camden Council resolved that it was "minded to grant" planning permission for revised LRC proposals, on certain conditions. However, by that time the recession was beginning to bite and later that year Rosehaugh, one of the LRC developers, ceased trading. LRC's outline planning application for the railway lands was eventually withdrawn, in 1994, in the face of the poor economic conditions and a Government decision to promote an alternative scheme for the CTRL, with the terminus at a high level at St Pancras station. It is this scheme (in essence) that LCR are now constructing.
- 2.7 On this revised arrangement, with a terminus provided at St. Pancras, the Channel Tunnel Rail Link Bill for a revised easterly route was lodged in Parliament in 1994 and LCR won the right to build and operate the new high – speed line. The Channel Tunnel Rail Link Act was passed in 1996.
- 2.8 The CTRL is being constructed in two phases. Section 1 of the link runs from the Channel Tunnel portal to North Kent and is now completed (on time and on budget) and open. Financing arrangements for Section 2 of the link, to extend the line into a new international terminus at London St. Pancras, were confirmed in April 2001 and LCR remain on course to complete Section 2 by 2007. Completion of Section 2 will allow the opportunity to comprehensively redevelop the remaining land to finally emerge.



### 3.0 BACKGROUND TO KING'S CROSS CENTRAL (KXC) PROPOSALS

- 3.1 The physical, social, economic and environmental “framework” that underpins the current proposals has evolved since 2000. The evolution of the proposals has both informed, and been informed by, the evolution of planning policy and guidance for the KXC site. The evolution of the current proposals has also involved extensive consultation exercises with a wide range of stakeholders in the planning process.
- 3.2 The applicants have taken a step-by-step approach to researching, testing and refining the physical, social, economic and environmental framework that underpins the current proposals. The approach is explained in the following key public consultation documents:-

Key Date	Document/Event
July 2001	<p data-bbox="492 684 854 716"><b>Principles for a Human City</b></p> <p data-bbox="492 747 1390 1041">In July 2001, the applicants published a document entitled “Principles for a Human City”. It responded to and gave further definition to, the “emerging principles” for the future regeneration of King’s Cross, published jointly by LCR, the London Borough of Camden and the King’s Cross Partnership in November 1997. The “Principles for a Human City” document stated that the objective for KXC is to devise and then deliver over the next 15 or so years, an exciting and successful mixed use development; one that will shape a dense, vibrant and distinctive quarter, bring local benefits and make a lasting contribution to London.</p> <p data-bbox="492 1077 1360 1171">The document set out ten principles, to codify and amplify the development objectives for King’s Cross. The applicants have used these principles to test emerging ideas. They are:</p> <ul data-bbox="492 1209 1057 1545" style="list-style-type: none"> <li>• A robust urban framework;</li> <li>• A lasting new place;</li> <li>• Promote accessibility;</li> <li>• A vibrant mix of uses;</li> <li>• Harness the value of heritage;</li> <li>• Work for King’s Cross, work for London;</li> <li>• Commit to long term success;</li> <li>• Engage and inspire;</li> <li>• Secure delivery; and</li> <li>• Communicate clearly and openly.</li> </ul>
October 2001	<p data-bbox="492 1583 1052 1614"><b>King’s Cross – Towards an Integrated City.</b></p> <p data-bbox="492 1650 1377 1904">In October 2001, the London Borough of Camden set out key objectives to integrate the new developments at King’s Cross successfully with the surrounding areas. “King’s Cross – Towards an Integrated City” states (at Page 4) that Camden endorsed “Principles for a Human City” as a positive and enlightening statement of urban policy for the 21<sup>st</sup> century. In particular, Camden welcomed the applicants’ commitment to providing high quality urban design, the importance accorded to the street environment and the recognition of the unique qualities and sense of place created by the historic</p>

Key Date	Document/Event
	buildings and fabric within the site. The document also stated that Camden was delighted to see a commitment to a high density, mixed use development, accessible to all and within the spirit of other great developments that have already shaped central London for the better (at page 5).
December 2001	<p><b>Parameters for Regeneration</b></p> <p>The applicants published "Parameters for Regeneration" in December 2001. Following some 18 months of research, various parameters were identified to inform future development proposals (as well as seeking to positively contribute towards the London Borough of Camden's ongoing review of the planning policies and planning brief for the site). The parameters addressed were as follows:</p> <ul style="list-style-type: none"> <li>• Land ownership and physical boundaries;</li> <li>• The Channel Tunnel Rail Link (CTRL);</li> <li>• Planning policy expectations;</li> <li>• High density, mixed use development;</li> <li>• Strategic views and tall buildings;</li> <li>• Integrated neighbourhoods;</li> <li>• Integrated communities;</li> <li>• Listed buildings and other heritage resources;</li> <li>• Environmental parameters and designations;</li> <li>• Other transport infrastructure;</li> <li>• Site infrastructure, services and utilities;</li> <li>• Adjacent development projects; and</li> <li>• Viability.</li> </ul>
June 2002	<p><b>King's Cross - Camden's Vision</b></p> <p>In June 2002, the London Borough of Camden published a document entitled "King's Cross – Camden's Vision". The document was intended to provide an important backdrop for the planning policies of Camden. Page 14 of the document referred to "Principles for a Human City", July 2001 and "Parameters for Regeneration", December 2001, stating that both documents contained good ideas on how to make King's Cross Central and surrounding areas a better place in which to live, work and travel. Camden welcomed the commitment to providing good quality design, the importance given to the street environment and the recognition of the unique qualities and sense of place created by the historic buildings.</p>
September 2002	<p><b>A Framework for Regeneration</b></p> <p>The third consultation document published by the applicants in September 2002 was "A Framework for Regeneration". It built upon the ideas and information developed in the preceding consultation documents. The document described an emerging framework of new public routes and places, presenting a range of development ideas for each part of the proposed framework for comment.</p>

Key Date	Document/Event
	<p>The document:</p> <ul style="list-style-type: none"> <li>• Set out the fantastic opportunity at King's Cross Central;</li> <li>• Explained how the past and present development of King's Cross presents a major challenge – a fragmented and disconnected city;</li> <li>• Described a framework of new public routes and spaces which the applicants believed could: <ul style="list-style-type: none"> <li>- Help join up the city;</li> <li>- Integrate King's Cross Central with existing neighbourhoods and communities in Camden and Islington; and</li> <li>- Provide the template, over time, for the introduction of new buildings, land uses and activities;</li> </ul> </li> <li>• Presented a range of development ideas, for each part of the proposed framework; and</li> <li>• Asked questions, at regular intervals, for consultees to tear out and complete.</li> </ul> <p>Section 4 of the document explained the applicants' belief that three principles, in particular, should underpin the framework for King's Cross Central:</p> <ul style="list-style-type: none"> <li>- <i>"Create a network of safe pedestrian routes and other connections, to join up different parts of the city and integrate King's Cross Central with existing neighbourhoods and communities in Camden, Islington and Bloomsbury;</i></li> <li>- <i>Learn from the urban grain of Central London, its pattern of built development, to combine (a) street, squares and other routes and spaces that are easy to use and understand with (b) opportunities to develop buildings that will be attractive to their users and occupiers and commercially and socially successful; and</i></li> <li>- <i>Embed the best historic buildings and heritage features within the new development, within the fabric of the city".</i></li> </ul> <p>Figure 7 within the Framework document presented a series of four drawings that illustrated how the applicants began applying these principles to King's Cross.</p> <p>Section 6 of the document presented information and ideas that asked questions, about sustainable development, heat and power, water resources, transport, social and economic integration and the draft scope for the Environment Impact Assessment.</p>
June 2003	<p><b>Framework Findings</b></p> <p>The "Framework Findings" (June 2003) document provided an interim report on the consultation response to 'A Framework for Regeneration'. It presented an overview on what people had said and written about the September 2002 framework proposals and ideas, to inform ongoing discussions with the local planning authorities (Camden and Islington) and others. It explained, for example, that the applicants consulted over 4,000 people between July 2001</p>

Key Date	Document/Event
	<p>and March 2003, including representatives of over 150 community, business, environmental and other organisations. Responses to the 'framework' came via a "vox pop" exercise, workshops, completed questionnaires and tear-off slips, e-mails, web-site and other contributions.</p> <p>'Framework Findings' was prepared in collaboration with consultation specialists FLUID, who helped to shape and manage the consultation process and analyse the results.</p> <p>FLUID are the authors of the 'Statement of Community Engagement' report submitted by the applicants in support of the King's Cross Central planning applications.</p>

3.3 Figure 2 (set out in Appendix 2) shows how the evolution of this thinking has both informed, and been informed by, the development of policies for King's Cross, within the planning system. Figure 2 also charts five key stages in the evolution of the spatial layout and development proposals. The five stages are illustrated in the Environmental Statement:-

Key Date	Event
December 2000	<p>Stage A</p> <p>Stage A represents early thinking that was undertaken prior to the publication of "Principles for a Human City" and prior to the London Borough of Camden's review of its Chapter 13 planning policies. Much of the thinking, policy, guidance and advice that has emerged subsequently has its roots in the work of the Urban Task Force, set up in 1997 under Lord Rogers. In their report "Towards an Urban Renaissance" published in 1999, the Task Force sought to achieve a higher proportion of residential development on brownfield sites, higher densities through better design and sustainable communities with access to public transport and local services.</p>
February 2002	<p>Stage B</p> <p>At Stage B, the applicants and their masterplanning team began to apply the ten "principles for a human city", taking full account of early London Borough of Camden documents as well as other information set out in "Parameters for Regeneration".</p>
July 2002	<p>Stage C</p> <p>Stage C represents the emergence of new ideas, in response to informal consultation on "Stage B" and new information about, for example, the possible requirement for, and implications of, new low level platforms and a new tunnel, at King's Cross Station (as later shown in pages 28 and 29 of the "Framework" document) and likely requirements of UDP and Mayoral (GLA) policies.</p>



September 2002	<p>Stage D</p> <p>The “Framework for Regeneration” document (see above).</p>
February 2004	<p>Stage E</p> <p>The submitted development proposals, prepared with the benefit of all the documents shown on Figure 2, including revised development plan policy within Camden and the King’s Cross Opportunity Area Planning and Development Brief prepared jointly by the London Borough of Camden and Islington and adopted in December 2003/January 2004.</p> <p>The current proposals have been tested and refined between Stages A and E in the context of:</p> <ul style="list-style-type: none"> <li>• The progression from ‘principles’, to ‘parameters’, through to ‘framework’ and ‘framework findings’, as explained above;</li> <li>• Increasing knowledge and awareness about the site, its opportunities, its constraints, particular characteristics and other parameters;</li> <li>• An emerging planning policy consensus, in favour of high density, mixed use development at King’s Cross;</li> <li>• Increasing clarity about Camden, Islington, Greater London Authority (GLA) and other priorities;</li> <li>• Ongoing, informal consultations with the local planning authorities, English Heritage, the GLA, Commission for Architecture and the Built Environment (CABE) and others; and</li> <li>• Wider consultation response to the ideas in ‘A Framework for Regeneration’, as summarised in ‘Framework Findings’.</li> </ul>

3.4 Plans charting the evolution of the applicants’ ideas for the layout of the development through Stages A-E are included within the Environmental Statement.

3.5 There are significant changes between the “Framework” document (Stage D) and the current proposals. For example, in relation to the grouping of heritage buildings to the north of the Regent’s Canal:

	Stage D/ Framework	Stage E/ Planning Applications
Gas holder no. 8 guide frame	Under review	To be dismantled, relocated and then re-erected within Development Zone N
Gas holder triplet guide frames	Under review	To be relocated and re-erected around new development within Development Zone N
Western Goods Shed	Under review / Potential demolition in part	To be demolished, to make way for the triplet of Gasholder guide frames
Midland Goods Shed	Under review	To be retained and refurbished (see Main Site Development Specification Annex E)
East Handyside Canopy	Under review	To be retained and refurbished, with the limited removal of one bay at the northern end. (See Main Site Development Specification Annex E.)
West Handyside Canopy	Potential demolition	To be retained and refurbished, with the limited removal of one bay at the northern end. (See Main Site Development Specification Annex E.)
Regeneration House	Under review	To be retained and refurbished. (See Main Site Development Specification Annex E.)

3.6 The current proposals also take into account the responses to the Framework document, as described in “Framework Findings”. The principal findings were:

- On the whole, people were very supportive of the Framework proposals and ideas;
- Making King’s Cross clean and safe is the major priority for local people, followed by community access to new facilities and services;
- Some people expressed concern that the applicants might not be able to ‘deliver’ the Framework proposals;
- Many of the responses raised questions or concerns about the character of the place, and in particular, the implications for heritage buildings;
- There was strong interest in (and feeling about) the gas holders. Most people support the relocation and re-use of the guide frames.

3.7 The current proposals and supporting documents take account of these and other findings, so that:

- A high quality ‘world class’ public realm incorporating many new high quality routes and open spaces is at the heart of the framework for the current proposals. The public realm would be a great ‘breathing space’ inserted amongst new urban blocks, binding them together. The framework provides a great opportunity to connect real spaces together, integrate communities and their neighbourhoods and provide safe and accessible open space, not only for outdoor recreation and play but also to create venues for public

events and a focus for the community. The applicants have submitted a Public Realm Strategy, alongside the planning applications, and this addresses the maintenance and management of the public realm, responding to community aspirations for safety and cleanliness;

- The Main Site proposals provide for up to 75,765 sq m of community, health, education and cultural uses within the D1 use class and up to 31,550 sq m of assembly and leisure uses within the D2 use class. In addition, the submitted proposals for the Triangle Site include up to 3,500 sq m for Class D1 and D2 uses. The applications provide scope, therefore, for the phased delivery of health, education and community facilities and the applicants intend to agree thresholds and mechanisms for this delivery with the LPAs. This way the applicants, the LPAs and other service providers have scope to decide later on the precise form of new provision, armed with the best information available at the time (Implementation Strategy, paras 5.41-5.42). This is in line with the approach envisaged in the Joint Planning and Development Brief (paras 2.10.8, 2.11.5 and 2.12.4);
- The submitted proposals include the retention and/or relocation, and refurbishment, of many historic buildings and structures, including the listed gas holder guide frames.
- The applicants have prepared and submitted an Implementation Strategy. This explains how the applicants would approach the phased implementation of the development, having regard to commercial, cost, environmental, technical, place-making, planning and other matters. The applicants have also submitted a Code of Construction Practice. These documents represent a comprehensive response to local concerns about construction impacts and delivery.

3.8 In this way, the applicants have responded to the expressed desire of the local authorities and local communities, to see major development and regeneration started, and completed, as soon as possible, to overcome the problems and uncertainties that have blighted the KXC site in the recent past.



#### 4.0 ADOPTED CHAPTER 13 OF CAMDEN UDP, APRIL 2003

- 4.1 The KXC proposals comply with the hierarchy of relevant planning guidance and policy at the national, strategic and local levels. In the following sections, the proposals are assessed against the main relevant guidance and policy.

#### Approach to Policy Assessment

- 4.2 At the national level, Planning Policy Guidance notes (and now Planning Policy Statements) set out the Government's policies on different aspects of planning and a summary of the most relevant PPGs in the context of the KXC proposals is set out in Section 10.0 of this Statement.
- 4.3 At the strategic level, specific planning objectives and policies for the site are set out in London-wide guidance in the London Plan, adopted in February 2004 and addressed in Section 9.0 of this Planning Statement. Although the London Plan supersedes Regional Planning Guidance (RPG3 – Strategic Guidance for London Planning Authorities, adopted in May 1996), RPG3 is still addressed in Section 8.0 below as it provides important historic policy context to the evolution of proposals for the King's Cross Opportunity Area, and is the basis for adopted UDP policy.
- 4.4 At the borough-wide level, specific planning objectives and policies for the site are set out in the Unitary Development Plans (UDPs) for Camden and Islington. Development plan policy covering the Main Site is set out in:
- adopted Chapter 13 of the Camden UDP (May 2003), which supersedes the King's Cross chapter of the adopted UDP (March 2000) and is also referred to as UDP Alteration No.1; and
  - Alteration No.2 – Affordable Housing and Mixed Use Policies, adopted by the Council in January 2004 ; and
  - the remaining chapters of the adopted Camden UDP (March 2000), i.e. those unaffected by the Alterations referred to above.
- 4.5 The 'new' UDP Chapter 13 (May 2003) is carried forward unchanged into the Deposit Draft Replacement Camden UDP (June 2003), as Section 9. It is addressed later in this section of the Planning Statement.
- 4.6 Other relevant policies within the wider, adopted Camden UDP (March 2000) and the Deposit Draft Replacement Camden UDP (June 2003) are addressed in section 5.0 of this Planning Statement.
- 4.7 As the Triangle Site straddles the borough boundaries, the Camden component of development plan policy is the same as for the Main Site (as set out in the above paras) but, in addition, policies in the adopted Islington UDP (June 2002) apply. These are addressed in Section 6.0 of this Statement.
- 4.8 The Joint Camden and Islington Planning and Development Brief is addressed in Section 7 of this Planning Statement. The Brief is adopted as Supplementary Planning Guidance (SPG). The King's Cross Conservation Area Statement, December 2003 and the Regent's Canal Conservation Area Statement, January 2001 are also relevant, as Supplementary Planning Guidance.

## Weight to be attached to Development Plan Policy

- 4.9 Section 54A of the Town and Country Planning Act 1990 states that any determination made under the Planning Acts should be made in accordance with the development plan, unless material considerations indicate otherwise. No change to this position is proposed under the current Planning and Compulsory Purchase Bill which is anticipated to receive Royal Assent shortly with a commencement date later in Summer 2004.
- 4.10 As a consequence, where any applicant proposes a development in accordance with a development plan, in terms of policy, the proposal should be received favourably by the LPA.
- 4.11 In the current context, the development plan for the Main Site comprises the new, up-to-date Chapter 13 of Camden UDP (adopted in May 2003) relating to the King's Cross Opportunity Area, and other policies in the Camden UDP (adopted in March 2000) and Alteration No.2 Affordable Housing and Mixed Use Policies adopted in January 2004.
- 4.12 The development plan for the Triangle Site comprises the same documents plus the Islington UDP (adopted in June 2002).
- 4.13 The London Plan adopted in February 2004 is a material policy consideration. Although adopted, it does not currently form part of the development plan for London. However, when the Planning and Compulsory Purchase Bill becomes enacted (anticipated shortly with a commencement date later in Summer 2004) the London Plan will become part of the development plan for London.
- 4.14 The weight that should be attached to the emerging reviews of the Camden and Islington UDPs will depend upon how far they have progressed in the development plan preparation process towards adoption. With regards to the Deposit Draft Replacement Camden UDP (June 2003), the deposit period expired in September 2003. The Council reported representations received and its proposed responses to the Executive on 17<sup>th</sup> March 2004. A Revised Deposit Draft was published on 7<sup>th</sup> May 2004. Although no date has yet been set for the local Public Inquiry, this is likely to take place at the end of 2004. The Camden UDP Review is thus at a relatively early stage in the process towards adoption. Therefore, whilst a material consideration to planning decisions, the weight attached to it should be limited.
- 4.15 With regards to the Islington UDP which was adopted in June 2002, the Council have not yet published any review documents for public consultation. Any review document will be in the format of a Local Development Framework, but no timetable for publication has yet been established.
- 4.16 In view of the importance of development plan policy highlighted by Section 54A of the Town and Country Planning Act 1990 and the 'plan led' approach to King's Cross (Appendix 2), development plan policy is addressed in this Statement before Supplementary Planning Guidance, regional and national planning guidance. As the very much larger of the two outline planning applications lies wholly within the London Borough of Camden, Camden development plan policy is addressed first and, in particular, adopted Chapter 13 of the Camden UDP review as it relates specifically to the King's Cross Opportunity Area, is up-to-date and has undergone a thorough and rigorous public consultation exercise (including a local Public Inquiry). This is followed by an analysis of the adopted Camden UDP, March 2000, Alteration No.2 Affordable Housing and Mixed Use Policies adopted in January 2004 and the Camden Replacement UDP, Deposit Draft, June 2003. Whilst the former two documents are part of the development plan, their policies, proposals and supporting text are not specific (or even relevant in some cases) to

the King's Cross Opportunity Area and apply borough-wide. With reference to the latter, this is a material consideration but at an early stage in the process towards adoption.

- 4.17 The Planning and Development Brief for the King's Cross Opportunity Area prepared and adopted jointly by both Councils is dealt with before the London Plan as it addresses the Opportunity Area in detail and it is up-to-date having been adopted in December 2003/January 2004. Although the London Plan supersedes RPG3, the latter is still considered as it provides an important historic policy context to the evolution of proposals for the King's Cross Opportunity Area.

### Evolution of Camden UDP Chapter 13

- 4.18 Chapter 13 (King's Cross Opportunity Area) of the Camden UDP review, which was formally adopted in May 2003, replaces Chapter 13 of the Camden UDP adopted in March 2000. Its history is that in July 2001, the London Borough of Camden published a pamphlet for consultation entitled 'Planning for the Future of King's Cross' for comments on the key issues the public felt were important in the area. The comments received were considered and taken into account in the preparation of Deposit Draft Policies for the King's Cross Opportunity Area which was published for consultation in December 2001. The responses to that consultation were considered and revised planning policies were published in January and March 2002.
- 4.19 Between April and May 2002, a local Public Inquiry was held into Chapter 13. The applicants took part in that Inquiry, having lodged a number of objections. The Council put forward a number of suggested modifications, to address these and other objections, prior to and during the Inquiry. By the close of the Inquiry, the applicants had only two remaining 'live' objections, both concerning the explanatory text of the proposed Chapter 13 (i.e. not the policies themselves). One concerned the way the draft text referred to family housing; the other car free housing and in particular references to a figure of "75% car free housing".
- 4.20 The Inquiry Inspector published his report and recommendations in August 2002. He recommended changes to the wording of the UDP on both family housing and car free housing. The London Borough of Camden updated the deposited policies in Chapter 13 in the light of the recommendations in the Inspector's Report and consulted upon the Modifications in October and November 2002. The representations received were considered by the Council in January and March 2003 and taken to the Council meeting on the 14<sup>th</sup> April 2002. The policies were then adopted on 1<sup>st</sup> May 2003.
- 4.21 Accordingly, the policies in the new, up-to-date adopted Chapter 13 of the Camden UDP have undergone a thorough and rigorous public consultation exercise (including a local Public Inquiry).
- 4.22 The Chapter 13 policies recognise that the King's Cross Opportunity Area has the potential to create a new quarter for London which enhances features of historic and conservation importance and which provides scope for business development, tourism, leisure, housing, community facilities and measures to enhance local access to employment opportunities (Paragraph 13.1).

### Strategic Policies

- 4.23 Chapter 13 sets out four Strategic (Part I) Policies for the King's Cross Opportunity Area. The first of these, Strategic Policy SKC1 states:

*'The Council seeks the sustainable development of the King's Cross Opportunity Area which achieves its full potential:*

- *To support and develop London's role as a world business, commercial and cultural centre;*
- *To achieve economic, social and physical integration with surrounding communities;*
- *To contribute positively to meeting the full range of housing, social and healthcare needs in Camden and so contribute to meeting London's needs;*
- *To create employment and training opportunities both generally and for local people;*
- *To maximise opportunities for walking and cycling and the use of existing and proposed public transport facilities, thereby minimising dependence on private car use and traffic generation;*
- *To minimise any adverse impact on the environment arising from the development and to secure positive environmental gains;*
- *To enhance opportunities for biodiversity; and*
- *For community regeneration through innovative processes of community involvement in the planning, design and management of the new development services.'*

4.24 Policy SKC1 therefore encapsulates the full range of 'headline' planning objectives for the KCOA, under the banner of sustainable development. Sustainable development is addressed below, together with the other topics/issues raised by SKC1:

- Business, commerce, employment and training;
- Integration with surrounding communities;
- Housing;
- Health and other community uses;
- Transport;
- Biodiversity and the environment; and
- Community Involvement.

4.25 The analysis below confirms that the submitted proposals are consistent with and meet SKC1, together with all other policies within the adopted UDP Chapter 13.

## Sustainable Development

4.26 It is widely recognised that the King's Cross Opportunity Area is one of the few remaining major brownfield development opportunities in inner London and is certainly the major one in Camden. There is, therefore, an onus on the development proposals to achieve the full potential of the site. The proposals comply with this objective. They comprise high density, mixed use development which would achieve the site's potential. The mixed use development in such a highly accessible area would help bring all activities within closer reach enabling people to work closer to where they live and vice versa thereby reducing the overall need to travel.

4.27 The proposals would provide an outstanding development that embraces its built and natural heritage and applies other principles of sustainability in a socially inclusive way. The very location and nature of KXC means that in a number of respects the proposed development is intrinsically environmentally sustainable. The entire site comprises "brownfield" land. The presence of heritage buildings and structures means that, where practicable, these can be refurbished and used as part of the development. King's Cross is an important existing transport node and is acknowledged to have the best public transport accessibility in London. This will



improve further with the completion of the CTRL, the extended St. Pancras station and the associated infrastructure.

- 4.28 However, sustainable development is an over-arching, recurring theme which informs all aspects of the KXC proposals; it is not a discrete topic. Sustainable development is relevant to other SKC and KC policies addressed later in this section as their underlying objectives are part of sustainable development. Accordingly, Appendix 5 sets out a number of sustainable development objectives based on those stated by Camden within its Sustainability Appraisal of the emerging draft UDP, in the form of a matrix diagram. The matrix identifies where these objectives are addressed within the submitted applications and the suite of supporting information. The matrix confirms that every component of sustainable development has been considered and addressed.

### Business, Commerce, Employment and Training

- 4.29 As shown in Table 1 on Page 6 of this Statement, the proposals for the Main Site seek permission for up to 486,280 sq m of business and employment floorspace, in order to establish an enterprise 'cluster' of offices with the requisite critical mass to be successful. As explained in the Implementation Strategy (paras 3.13-3.22), the applicants are keen to attract a full range of 'Central London' businesses to King's Cross, to transform the area into one of the capital's primary business locations, supporting the full range of one-person start-up businesses, small and medium sized enterprises as well as larger occupiers.
- 4.30 As reported in the Regeneration Strategy (4.1.2.1), the product range, the scale of the 'offer' and the long-term management and ownership structure proposed at KXC would help to create a vibrant, viable cluster for enterprise. The proposals include scope for a range of different commercial building formats, with modern office floorspace suitable for a variety of businesses. The plots are designed to accommodate efficient, flexible buildings, which allow sub-division to cater for multiple lettings and a mix of large and small occupiers in response to market demand. Many of the historic buildings naturally lend themselves to floorspace layouts more suited to small companies and niche retailing,
- 4.31 Overall, the Environmental Statement and the Regeneration Strategy conclude that KXC could deliver around 30,000 new jobs, of which up to 40% might be taken by local people within a defined 'central impact zone' and 'wider impact zone', with the right employment brokerage and training measures in place (Regeneration Strategy, page 2).
- 4.32 King's Cross Central would create:
- Entry level jobs for the unskilled and inexperienced;
  - Local employment opportunities that allow households to balance work/home time, allowing dual income earning households, through part-time working, flexible hours, second jobs and the ability to take-up 'incentive benefits' such as income support and tax credits; and
  - Local jobs, which may be taken by people who are already working but who choose to upgrade their positions or wages, or who prefer to work more locally.
- 4.33 The applicants would assist in promoting local employment and consider it a priority issue where it would be able to take a lead, as explained further at section 6.1.2 of the submitted Regeneration Strategy.

## Integration with Surrounding Communities

- 4.34 The scale of the development, the number of jobs created, and the facilities offered, would thus have London-wide and possibly, national impacts. Yet the site also lies immediately adjacent to some of the most deprived communities in the UK. Recognition of this fact in the extensive consultation, design and planning work that has led to the final form of the proposals means that the proposed development would dramatically improve physical, social and economic conditions experienced by these communities (Regeneration Strategy page 2).
- 4.35 UK evidence suggests that the inter-related changes brought about by KXC would trigger dramatic new levels of development activity across North London, enable economic intensification and bring new employment opportunities, new housing and choice of tenures, and a host of cultural, leisure and social benefits to existing populations (Regeneration Strategy, page 3). Overall, the submitted development proposals are in line with national, London and local aspirations for achieving and optimising regeneration. They contain the essential component needed to integrate new and existing communities with the opportunities created by new development. The proposals meet the common sustainability and regeneration objectives of Central, London-wide and Local Government, whilst addressing aspirations and concerns raised by local people (Regeneration Strategy, page 1).

## Housing

- 4.36 The KXC proposals would contribute positively to the full range of housing needs, including the need for affordable/low-cost housing. The outline planning application for the Main Site seeks permission for floorspace that could provide up to 2,300 new units and the outline planning application for the Triangle Site seeks permission for up to 250 new units. Together, the two applications provide for more than twice the net increase in housing units (1,000 minimum) sought under Policy KC4 (see below). The current proposals provide for studio, one bed, two bed, three bed and four bed accommodation, including homes suitable for families. Thresholds for the phased delivery of a significant proportion of affordable/low cost housing would be agreed with the local planning authorities.
- 4.37 The introduction of a significant new resident population as a result of the KXC proposals would have a significant beneficial impact not only by contributing positively to the full range of housing needs in the area but also by reintroducing a 24 hour residential presence in the area. The proposals would also help balance the tenure profile in the area by introducing a range of market, intermediate, key worker and other affordable/low-cost housing.
- 4.38 The Regeneration Strategy concludes that KXC would facilitate a number of economic and social changes (set out on pages 3 and 64 of the Strategy). A large proportion of high quality intermediate housing within the affordable housing component, with a range of tenures and financing initiatives on offer, would help maximise social and economic regeneration objectives locally and across London. In particular, it would provide the basis for a local "housing ladder" in which a choice of tenures and prices is available to local residents.

## Health and Other Community Uses

- 4.39 The proposals for the Main Site include up to 75,765 sq m of Class D1 (non-residential institutions) uses (such as community, health, education and cultural uses). The proposals for the Triangle Site include the provision of up to 3,500 sq m of Class D1/D2 uses. The Class D1 uses proposed on the Triangle Site are a medi-centre providing surgery facilities with an associated community room/space and crèche/day nursery facilities. These would contribute positively to

meeting social and healthcare needs in the area. Other D1 uses, on the Main Site, would help support and develop London's role as a cultural centre. The following indicates a list of some of the types of facilities that could be provided within the floorspace applied for on the Main Site (should it be necessary and/or appropriate to do so):

- i) Library facilities;
  - ii) Community centre facilities;
  - iii) Youth facilities;
  - iv) Primary health care and support facilities;
  - v) Day care facilities;
  - vi) Day nursery facilities;
  - vii) Primary school provision;
  - viii) Higher education colleges;
  - ix) Visitor/tourist information centre;
  - x) Industrial heritage and other museums;
  - xi) Art galleries/exhibition space;
  - xii) Enhanced facilities for boat users.
- (para 3.27 of the Development Specification for the Main Site)

4.40 The proposed distribution of D1 uses on the Main Site is set out in a zonal floorspace schedule at Annex B to the submitted Development Specification, whilst the uses on the Triangle Site would be located in Block C and are shown on submitted Parameter Plans TS005 and TS006.

4.41 As explained at para 3.6, therefore, the applications provide scope for the phased delivery of new health, education and community facilities and the applicants intend to agree thresholds and mechanisms for this delivery with the LPAs. This way, the applicants, the LPAs and other service providers have scope to decide later on the precise form of new provision, armed with the best information available at the time (Implementation Strategy, paras 5.41-5.42).

4.42 The level, mix, timing and delivery of community, health and education provision are therefore matters for agreement with the local planning authorities. This is in line with the approach envisaged in the Joint Planning and Development Brief (paras 2.10.8, 2.11.5 and 2.12.4).

## Transport

4.43 The KXC proposals would maximise opportunities for walking and cycling and the use of existing and proposed public transport facilities, in conformity with Policy SKC1.

4.44 Mixed use development on a site which is acknowledged to have the best public transport accessibility in London would help bring all activities within closer reach enabling people to work closer to where they live and vice versa, thereby reducing the overall need to travel.

4.45 The submitted Transport Assessment and Green Travel Plan explain that some 85% of journeys to work, for example, would take place on the railway and Underground networks, with a further 7% by bus and 3% on foot/cycle. These figures take no account of the long-term potential benefits offered by the Travel Plan, which provides the basis to further promote the use of sustainable modes of transport and minimise reliance on the private car.

4.46 The Travel Plan includes sections on:

- The sustainable location and development choices

- Travel Plan objectives
- Policy context
- The Applicants' philosophy
- Leading by example
- Travel accessibility at King's Cross
- Future travel patterns
- Improving transport facilities
- The Travel Plan Framework
- Reducing the need to travel
- Walking and cycling initiatives
- Access for all
- Public transport Initiatives
- Vehicle initiatives; and
- The Estate Management Company.

## Biodiversity and The Environment

- 4.47 Policy SKC1 requires development of the King's Cross Opportunity Area to minimise any adverse impact on the environment arising from the development and to secure positive environmental gains.
- 4.48 The preparation of the Environmental Statement (ES) in support of the applications has been an iterative process, through which the scheme (as shown on the submitted Parameter Plans) has been informed by the identification of potential impacts. As a consequence, as the scheme has developed, potential environmental impacts have been avoided and reduced. For example, both the Main Site and Triangle Site Development Specifications specify the performance of new drainage infrastructure, such that on the Main Site, for example, peak combined flow discharge would reduce by at least 10% (Development Specification para 3.40).
- 4.49 There is also a commitment to incorporate green/brown roof systems (Main Site Development Specification para 3.39) and, on construction, the applicants have prepared and submitted a Code of Construction Practice.
- 4.50 The ES sets out clearly the impacts of the proposed development, both adverse and beneficial, taking account of all of the measures incorporated into the scheme. It also sets out potential further mitigation measures that could further reduce or offset any adverse impacts, including measures that could enhance opportunities for biodiversity.
- 4.51 In addition, the applicants have prepared and submitted an Environmental Sustainability Strategy. This explains how the applicants would explore and address the environmental and natural resource issues which form one aspect of sustainable development (ESS, page I). The Strategy covers energy, waste, water supply and surface water disposal and construction materials.

## Community Involvement

- 4.52 The evolution of the current proposals has involved a step-by-step approach to researching, testing and refining the physical, social, economic and environmental framework that underpins the proposals. This has also involved extensive consultation exercises with a wide range of stakeholders in the planning process. The applicants have employed innovative community involvement techniques such that local communities and businesses have been able to engage constructively in the development process, as reported in 'Framework Findings' (see box text following para 3.2).

- 4.53 Framework Findings was prepared in association with independent consultation experts FLUID and they report that:

*"Argent St George has put consultation at the centre of its project and evidently takes seriously both the process and its findings.... We will continue to work with Argent St George to analyse and address the consultation findings, and help shape a process for continuing community involvement that is effective and makes a difference"* (Foreword)

- 4.54 FLUID have subsequently prepared a full Statement of Community Engagement for KXC, in three volumes, and these have been submitted as part of the overall suite of supporting documentation.

- 4.55 The applicants' effective use of innovative processes of community involvement was recently acknowledged in a report on Statements of Community Involvement prepared by Llewelyn Davies on behalf of the Office of the Deputy Prime Minister (ODPM). The innovative processes were quoted in the report as an example of good practice for "large scale pre-application consultation".

- 4.56 Page 44 of the Llewelyn Davies report noted that, at the time of writing, the involvement had focused mainly around the three consultation documents (Principles for a Human City, July 2001, Parameters for Regeneration, December 2001 and A Framework for Regeneration, September 2002) which were distributed to over 1,500 local stakeholders.

- 4.57 Page 43 of the report is worthy of note as it highlighted the principles behind the consultation exercise:

"

- Where possible, consultation is done in-house, not by consultants, so that consultees get first hand information and Argent St George gets first hand experience of their views;
- Senior staff managing the development do the consultation;
- Will meet anyone, at any time and in any place;
- Recognise that different groups have different concerns, at different items in the development process, and that different tools for involvement will be required;
- Emphasis on engaging with young people, recognising that they will be most affected by the scheme (and stand to benefit the most from it), as it is developed over the next 20 years;
- Commitment to be clear and open about their position at all times".

- 4.58 In December 2002, Argent Group were one of five private companies awarded a Festive Five Award by the Commission for Architecture and the Built Environment (CABE). The award was in recognition of forward thinking and innovation which has led to better buildings, places and spaces. Concerning the award, CABE stated:

*"Argent's track record in Birmingham's Brindleyplace and elsewhere is impressive. KXC, the development of the railway lands to the north of King's Cross and St. Pancras is a challenge on a bigger scale than anything they have tackled so far. The early signs are highly promising. In partnership with housing developer St. George, their work to date has pulled off the difficult task of setting out a clear design vision for the site while taking local communities and other key consultees with them as the ideas develop."*

- 4.59 When making the Festive Five Award, Jon Rouse (Chief Executive of CABE), said of Argent:

*"Teaming up with St George, the joint venture to redevelop King's Cross is highly promising. The mixed use scheme is hoped to bring local benefits and help to transform King's Cross into a distinctive urban quarter. The Argent Group have shown real commitment to public consultation and community involvement, especially with young people. We commend their website ([www.argentstgeorge.co.uk](http://www.argentstgeorge.co.uk)), which apart from being an informative resource, is also an interactive tool, allowing the local community and interested parties to have their say on the proposed King's Cross scheme. We encourage people to have a look and hope that Argent St George continue this excellent working practise with the community and truly consider their views'.*

- 4.60 In conclusion, the submitted proposals are fully consistent with and meet Policy SKC1. Indeed, they represent a clear expression of everything that the policy seeks to secure.

### Physical Integration, Use and Density

- 4.61 Strategic Policy SKC2 states:

*'The Council seeks the development of the King's Cross Opportunity Area as a generally mixed-use development that is well integrated with surrounding areas, with development densities and supporting facilities and uses appropriate to the high accessibility and urban characteristics of the Area and its environs.'*

- 4.62 Many of the issues raised by SKC2, in particular social and economic integration with surrounding areas, are addressed above under SKC1. Physical integration is addressed in more detail below, together with the other topics/issues raised by SKC2:

- Mixed use development;
- Density; and
- King's Cross Station (para 9.23 of the explanatory text seeks to ensure that redevelopment proposals for King's Cross Station are fully integrated into the overall development and are in balance with the public transport provision and the wider development.)

### Physical Integration

- 4.63 As explained at para 3.7, the proposals offer a high quality 'world class' public realm incorporating many new high quality routes and open spaces. These would connect real spaces together, integrate communities and their neighbourhoods and provide safe and accessible open space, not only for outdoor recreation and play but also to create venues for public events and a focus for the community. The applicants' Public Realm Strategy addresses the maintenance and management of the public realm, responding to community aspirations for safety and cleanliness.
- 4.64 The Regeneration Strategy (page 33) explains that KXC would bridge an existing divide between different communities. The proposals include a new hierarchy of streets and footpaths that permeate the site and link it to the east and west, for example with new bridges. There are new links to the local underground and train stations and the opportunity has been 'designed in' to accommodate the possible Cross River Tram. There are also walking routes that have never existed before, linking areas that have previously involved multiple transport changes and

inhospitable walking routes. For example, walking through KXC would halve journey times to Bingfield Park for Somers Town residents.

- 4.65 New proposed pedestrian routes include east-west connections across and along an enhanced Regent's Canal and through the site into the neighbouring communities in Somers Town, York Way and off Copenhagen Street.
- 4.66 Residents and users of the Triangle Site would also be able to easily access bus services within the Main Site, either to access facilities within the Main Site itself, or to connect with the public transport facilities offered at King's Cross Station.
- 4.67 The development offers the opportunity to integrate the Triangle Site not only with the Main Site (which the proposals would achieve) but also with the surrounding areas to the north, east and south. The Triangle Site is in a key location to connect pedestrian routes between other parts of the King's Cross development to the west and the residential communities and Bemberton Estate to the east. The site links directly to the northern end of the Long Park proposed within the Main Site that would form an important part of the principal public realm and pedestrian network in, and through, King's Cross Central.
- 4.68 These new routes would offer local residents direct access to a wide range of new employment, retail, social and leisure opportunities at KXC.

### Mixed Use

- 4.69 In accordance with Strategic Policy SKC2, the proposed development is mixed use. The land uses include business and employment, residential, service apartments, hotels, retail and food and drink, leisure, education, healthcare, and cultural and community uses. Taken together, para 13.20 of the explanatory text to the UDP recognises this as a "successful mix" and para 13.22 recognises that establishing the Opportunity Area as a lively sustainable urban quarter incorporating a range of business, retail, leisure and cultural uses, housing types and tenures will meet the objectives of Camden's Community Strategy, with its goal of reducing the gap between the richest and poorest parts of Camden.
- 4.70 Parameter Plan KXC 008 for the Main Site defines and describes the upper floors land uses along the principal street elevations within the development while Parameter Plan KXC 009 fixes the ground floor land uses along the principal street frontages within the development. It can be seen from these two Parameter Plans that the proposed development would have a mixed use character with active frontages at street level thereby enhancing vibrancy in the streetscape.

### Density

- 4.71 Paragraph 13.21 of the explanatory text to Policy SKC2 states:

*'Government and regional advice stress the desirability of locating higher density development and business uses close to public transport interchanges or termini ...'*

- 4.72 The KXC proposals are in line with Policy SKC2. The Central London Opportunity Areas, including King's Cross (which has the best public transport accessibility in London) are the most appropriate places to accommodate major new developments which generate significant travel demand. The average density of KXC development comprises a plot ratio of around 3:1. This is

high density development which seeks to optimise the full potential of this brownfield development opportunity benefiting from an excellent and improving public transport network in the heart of Central London, in accordance with thrust of policy at national, regional and local level.

- 4.73 Higher density development has been achieved at other locations within the Central Area and there is a strategic planning impetus to achieve target plot ratios of 4.5:1, as discussed further in Section 9 of this Statement. However, the density of development that has been achieved in the applicants' proposals reflects, rightly, factors such as the physical characteristics of the site, the location of the Regent's Canal, the retained heritage buildings and other sensitive structures and areas, the conservation areas, the Strategic View corridors and the requirements for high quality design. The proposals, as submitted, represent an appropriate, optimum development response to all of the relevant planning and design considerations.

### King's Cross Station

- 4.74 Paragraph 13.23 of the explanatory text states:

*'The Council will seek to ensure that the development proposals for King's Cross Station are fully integrated into the overall development and are in balance with the public transport provision and the wider development.'*

- 4.75 At present, no proposals have been submitted for the development of King's Cross Station. Network Rail is, however, currently considering separate proposals for a new western concourse at King's Cross Station, within the 'Area for King's Cross Station Enhancement' shown on Parameter Plan KXC004 (Principal Public Realm Areas).
- 4.76 The applicants have been working with Network Rail to integrate its aspirations for a new western concourse into the overall development of the area and to ensure that the two sets of proposals (for KXC and King's Cross Station Enhancement) relate well to one another and deliver a high quality solution to the area between the two main line stations. Paras 6.22-6.25 of the Main Site Development Specification provide further information and explain how the "balance" sought in the explanatory text has been achieved.
- 4.77 In conclusion, the submitted proposals are fully consistent with and meet Policy SKC2. Indeed, they represent a clear expression of everything that the policy seeks to secure.

### Comprehensive, integrated and phased development

- 4.78 Strategic Policy SKC3 states:

*'The Council seeks a comprehensive, integrated and phased development of the King's Cross Opportunity Area'.*

- 4.79 The proposals for KXC are self-evidently comprehensive, integrated and phased and comply with Policy SKC3. The two outline planning applications deal with all of the land between the Midland Main Line, CTRL, Thameslink 2000, York Way and Euston Road, and the two Development Specifications provide a comprehensive set of development parameters that more than meet the requirements for a "masterplan strategy" (explanatory text para 13.24).



4.80 Phasing is addressed within the Implementation Strategy, discussed above. The Implementation Strategy responds directly to paragraph 13.25 of the explanatory text to Policy SKC3, which states that each major phase of the comprehensive development of the King's Cross Opportunity Area should contain an appropriate balance of different uses, including affordable and market housing and complement previous or subsequent major phases and the surrounding area, in terms of scale, massing, layout, uses and linkages. The same paragraph continues that in view of the long history of uncertainty about future development at King's Cross, there is an understandable desire to see development completed within a reasonable timeframe.

4.81 The Implementation Strategy explains that:

- The applicants would aim to deliver the first and subsequent major phases as early as possible (para 2.15);
- The First Major Phase would be 'infrastructure heavy' and require a very substantial, early financial investment in the site, its utilities and capacity. It would concentrate on works necessary to assemble and prepare the development zones, for subsequent development, thereby addressing one of the key challenges that has faced this site for many years and delivering major public gains in terms of facilitating long-term regeneration (para 5.17);
- The First Major Phase would tackle the site comprehensively and deliver mixed use development, with new buildings and land uses to both the north and south of the Regent's Canal (para 5.17);
- The detailed content of subsequent major phases is of necessity uncertain. The overall aim, however, would be to deliver each major phase as soon as possible (para 5.22);
- The intention is that each major phase of development should contain a mix of different uses, including market and affordable/low-cost housing (para 5.35).

## Environmental Impact Assessment

4.82 Paragraph 13.26 of the explanatory text to Policy SKC3 mentions that the Council will require a comprehensive Environmental Impact Assessment (EIA) to be submitted in support of development proposals in the Opportunity Area. The paragraph also mentions that the Council will expect the information submitted to address a number of issues including social, biodiversity and transportation impact issues.

4.83 An EIA has been submitted (as referred to in para 1.11 of this Statement). The EIA assesses the likely significant environmental impacts of the proposals during both the construction and operational stages of the development and, together with the other supporting documentation also set out in paragraph 1.10 of this Statement addresses, social, biodiversity and transportation impacts fully.

## Design

4.84 Strategic Policy SKC4 states:

*'The Council will require a very high standard of design, architecture, townscape, layout, landscape and open spaces throughout the King's Cross Opportunity Area'.*

4.85 The accompanying explanatory text states that:

- "a design-led approach will be sought..." (para 13.27);

- “The Council will encourage a contemporary, bold, imaginative design approach that complements and enhances...existing features [Camley Street Natural Park and the site’s industrial heritage, most notably the Grade I listed stations and the Regent’s Canal]. This approach must acknowledge and respect the special character of the area, through a full assessment of its character and qualities.” (para 13.30).

- 4.86 The KXC proposals comply with SKC4. The submitted Parameter Plans, Landscape Proposals Plans and Annex E specification works, together with the supporting Urban Design Statement, Urban Design Guidelines, Public Realm Strategy and Triangle Explanatory Statement reflect and represent a very high standard of design, architecture, townscape, layout and open spaces. The proposals have been design-led by an outstanding professional team, led by Allies and Morrison and Porphyrios Associates, and a number of architectural and other practices (listed at para 7.5 of the Implementation Strategy), together with regular CABE Design Reviews, have helped to develop and test the ideas, as they have emerged.
- 4.87 The resulting proposals, moreover, fulfil all of the key ‘built environment’ objectives and aspirations set out in the Joint Planning and Development Brief, as discussed in more detail in Section 7 below.
- 4.88 The proposals also complement and enhance the site’s distinctive features, as explained within the Urban Design Statement and the Cultural Heritage and Townscape Chapter (Part 9) of the Environmental Statement. The applicants have undertaken a very full assessment of the area’s character and qualities as part of the EIA process and taken this into account as part of the design process. Accordingly, the ES concludes that:

*“Implementation of the proposed development would lead to the complete demolition of one listed building and three unlisted heritage buildings considered to make a positive contribution to conservation areas. The majority of Listed and unlisted heritage buildings and material, particularly within the Central Character Area (the Goods Yard complex) would be refurbished and embedded within the new development. The Gasholder Triplet and Gasholder No.8 group of guide frames would be re-established north of the canal. The proposals would achieve conservation and long-term management of the valued heritage resource. This would enhance the status and setting of these buildings, promoting their renewed contribution to the townscape and the community.*

*The proposed network of streets and civic spaces would replace fragmented areas of vacant and under-used land with a comprehensively planned and high quality environment for residents, workers and visitors within the site. It would also create routes across the King’s Cross Opportunity Area, linking communities to the east and west of the site.*

*The townscape proposals would result in a net increase in urban tree planting, mainly in the new development areas. The areas around the historic railway buildings would generally have a lower density of planting in order to retain their robust urban character. Historic surfaces would be restored in-situ or re-used within the Conservation Areas.*

*It is inevitable that the overall character of the Conservation Areas would change as a result of the proposals but their appearance would be enhanced by the quality of the proposed development.*

*Some local views of landmarks would be lost but others would be created as a result of the development. The overall appearance of the site would be improved and greater public access would create more opportunities to appreciate views of the heritage buildings and their settings.*

*Overall, the effects of the King's Cross Central development on heritage, townscape and views are considered to be beneficial and of moderate significance." (Overall Assessment, paras 9.8.146 – 9.8.154)*

- 4.89 Moving forward, the applicants remain committed to the ongoing procurement of high quality design, as set out within the Implementation Strategy, paras 7.3 – 7.10 and 7.14 – 7.16. For example, as each phase of buildings come forward for approval of reserved matters, the applicants would submit an Urban Design Analysis, to explain how the design of development forming part of the that major phase responds to the original Urban Design Guidelines.

## Local Policies

- 4.90 In addition to the four strategic policies, there are a series of local (Part II) policies in the new, up-to-date adopted Chapter 13 against all of which the proposals comply. Many of the issues raised are similar to those in the SKC policies. Where this is the case, the assessment is not repeated here; rather, only new issues are discussed and addressed below.
- 4.91 The first three policies, KC1-KC3, are discussed together.

## Mixed Use Development

- 4.92 Policy KC1 (Mixed Use Development) states that:

*'The Council will grant planning permission for development proposals for the mixed use development of the King's Cross Opportunity Area that;*

- *Include a range of economic activities that create a wide variety of employment opportunities;*
- *Provide an appropriate quantity, variety and mix of different housing types;*
- *Include appropriate levels of supporting community, cultural, social, educational, healthcare, leisure and retail activities and varied open spaces, with benefits to adjoining areas;*
- *Include other appropriate economic activities such as tourism, leisure or education facilities;*
- *Avoid large areas of single use development, which will generally be resisted;*

*and which accord with the policies set out below'.*

## Prioritisation

- 4.93 Policy KC2 states:

*'The Council will grant planning permission for development proposals for the King's Cross Opportunity Area that afford priority to the provision of a range of employment floor space and new housing accommodation, including affordable housing'.*

## Economic Activities

4.94 Policy KC3 states:

*'The Council will grant planning permission for development proposals for the King's Cross Opportunity Area that include a range of business uses (within Use Classes B1 and B2). Proposals should include:*

- *A range of different sized units, including smaller and 'start-up' units and workshops; and*
- *Units that have flexible physical design and layout'.*

4.95 The issues raised by these policies have been addressed already, under SKC1-SKC4 above. It is clear that the submitted proposals meet each and every part of KC1-KC3. The paragraphs below provide further commentary on three topics, namely:

- Retail activities
- Tourism
- B2 Business uses.

## Retail Activities

4.96 Paragraph 13.35 of the explanatory text states:

*'Large scale retail development would be inappropriate if it would threaten the viability and vitality of neighbouring centres in Camden Town, Islington and Westminster. The Council has recognised in Policy RE4 that the King's Cross Opportunity Area is a suitable location for uses that are major generators of travel demand such as office employment, shopping, higher education and leisure and Policy KC1 identifies retail activity as a component of mixed use development. Consistent with RPG3, near the main transport interchanges and termini there may be scope for specialist retail outlets to serve long distance travellers and tourism. Shopping providing accessible, essential convenience services will be important to meeting the needs of local communities and will be encouraged. New neighbourhood centres and small parades may be appropriate.'*

4.97 The proposals for the Main Site provide for up to 45,925 sq m of Class A1, A2 and A3 uses whilst the proposals for the Triangle Site include up to 2,500 sq m. The A1, A2 and A3 floorspace proposed on the Triangle Site would comprise three units or more with no single unit exceeding 2,000 sq m. It should be made clear that the applicants do not propose to construct more than 45,925 sq m of A1, A2 and A3 floorspace across the two sites (the Main Site and the Triangle Site) and would be willing to see (a) planning condition(s) to this effect.

4.98 This is an appropriate level of retail provision bearing in mind the factors and objectives highlighted in paragraph 2.5.2 of the Joint Planning and Development Brief. This acknowledges that retailing, leisure and entertainment uses including "commercial leisure" activities like cafés, restaurants, etc. are important because:

- *“New development should meet its needs for shopping, conveniently located for the whole development area and nearby communities, providing in particular varied retail activities appropriately located across the site, allowing residents, visitors and workers easy access to a range of shops and local services and contributing to a vibrant and rich streetscape;*
- *They are important supporting elements in the Area’s varied role within Central London, recognised as a ‘new quarter for London’ (RPG3) and as an Opportunity Area in the Central Activities Zone in the London Plan;*
- *They offer an appropriate, and potentially beneficial, alternative uses for a number of the heritage buildings, securing their future in a way that is likely to involve less extensive physical interventions;*
- *Key gaps in local retail provision can make it difficult for local communities to have easy access to a range of competitive goods and services.*
- *These uses can generate positive values which help deliver the mix of uses, high quality development and regeneration benefits called for in this Brief;*
- *The sharing of leisure, retail and cultural facilities can provide economic and social integration with a wider area;*
- *Shopping, entertainment and other uses can create lively, safer streets in a mixed use development, increase the range of job opportunities and attract people from the surrounding area to support cultural events.”*

4.99 The submitted Retail Assessment demonstrates that King’s Cross Central would not threaten the vitality and viability of neighbouring centres, and hence would fully comply with Policy KC1. The method used for the impact assessment has been scoped against requirements of the Joint Brief (para 4.1.13), the London Plan, and PPG6 (paras 4.3 and 4.13) and draft PPS6 (para 3.4). The study is sub-regional in nature and seeks to examine retail trends and prospects, and the use of surrounding centres, as well as potential demand at KXC from new workers, residents and visitors. The study contains both quantitative and qualitative aspects. A number of conservative assumptions are built into the method. A full description of how the applicants’ proposal responds to national, London-wide and Borough policy is given in Appendix 7, which reproduces Section 2 of the Retail Impact Assessment.

4.100 The Assessment report concludes that:

*“Retail and leisure facilities would play an important role in animating the development at KXC and in creating the regeneration benefits of the scheme. The nature of this provision – and the prospects for growth in this part of inner London – means that KXC would act to complement, rather than undermine, the vitality and viability of existing town centres.*

*Moreover, the quantitative assessment suggests that even on the conservative assumptions adopted there may be scope for additional retail floorspace over and above that now proposed. This would be without having adverse impacts on existing local centres.*

*The retail and leisure elements of the scheme, as part of a leading edge mixed use development and optimising the unique King’s Cross environment, provides the catalyst for the transformation of the King’s Cross area into a successful, balanced and vibrant community.” (Paras 54-56, Executive Summary).*

## Tourism

- 4.101 The Retail Impact Assessment report concludes that retail provision at King's Cross Central could generate substantial visitor spend (NB. This spend was entirely discounted for the quantitative assessment of expenditure requirements referred to above). KXC has the potential to provide unique flagship retail facilities making full use of its heritage resources particularly in the Goods Yard complex north of the canal, which would attract visitors from the broad metropolitan area and beyond.
- 4.102 In addition, the KXC proposals provide scope on the Main Site for up to 47,225 sq m of new hotels/serviced apartments.

## B2 Business Uses

- 4.103 Whilst there are some parts of the Opportunity Area with potential to accommodate some light industrial and/or general industrial uses (such as the linear land, for which the applicants intend to bring forward a scheme shortly), this potential is limited in the context of the KCOA as a whole.
- 4.104 Generally, B2 uses would be inappropriate in this location and hence do not feature in the Main Site or Triangle Site proposals. B2 uses would conflict with Government planning guidance (eg. PPG13) and adopted (Policy RE4) and draft Replacement UDP policies (Policies SD4, SD5, R1B and C3), the adopted Planning and Development Brief and the London Plan. Together, this guidance and policy confirms that the Opportunity Area is a preferred location for travel intensive uses such as retail, offices, higher education, leisure and tourism and that development should make full use of the potential of a site, avoiding the inefficient use of land. Large-scale industry is not well suited to the King's Cross Opportunity Area and it would fail to make full use of the site's potential.
- 4.105 The Joint Planning and Development Brief confirms (para 2.7.2) that heavier industrial activities are considered to be inappropriate to the Area and Triangle unless they directly support the railways and stations.

## Housing

- 4.106 Policy KC4 (Housing) states:

*'The Council will grant planning permission for development proposals for the King's Cross Opportunity Area that meets the following criteria:*

- *A net increase of at least 1000 housing units. 50% of the first 1000 housing units should be for affordable housing apportioned as 35% social housing for rent and 15% for essential workers and other intermediate occupiers;*
- *In considering proposals over and above the initial 1000 units (net) the Council has a target of 50% social rented and intermediate housing, again apportioned as 35% as social housing for rent and 15% for essential workers and other intermediate occupiers. The Council will take into account the London Plan, prevailing UDP policies, other relevant policies, local and/or London-wide housing needs, the wider regeneration needs of the King's Cross area, economic circumstances and other material considerations;*
- *All housing proposals should include a mixture of types, sizes and appropriate densities to meet local and/or housing wide housing needs including the need for*

*larger, family housing units. High density development will be appropriate subject to high quality design and sustainable residential quality; and*

- *The early provision of social and intermediate and other housing should be a significant element of each major development phase.'*

4.107 Housing, the provision of affordable/low-cost housing and phasing are addressed above, under Policies SKC1 – SKC4. As explained, the outline planning application for the Main Site seeks permission for floorspace that could provide up to 2,300 new units. The outline planning application for the Triangle Site seeks permission for up to 250 new units. Moreover, the total number of residential units on the Main Site would not be less than 1,600.

4.108 Taken together, therefore, the two applications provide for more than double the minimum net increase of 1,000 housing units sought in the policy. This is a major contribution to housing need bearing in mind that at paragraph 17.16 of the Inspector's report into Policy KC4 of the (then draft) Chapter 13 of the UDP concluded:

*"I recognise that the Council is seeking a net increase of at least 1,000 dwellings but in the final analysis, a slightly lower figure might be more appropriate or at least acceptable".*

4.109 Paragraph 13.49 of the explanatory text explains that the Council is concerned that the development provides the full range of types of housing accommodation including family units which are a Camden priority. In this respect, the KXC proposals would provide a full range of unit sizes, including homes suitable for families. The new residential development on the Main Site would be constructed with the following mix of sizes:

First 1,600 units

i)	Studio/1 bed	40%
ii)	2 bed	37%
iii)	3 bed	18%
iv)	4 bed	5%

Additional Units

v)	Studio/1 bed	45%
vi)	2 bed	40%
vii)	3/4 bed	15%

4.110 The outline planning application for the Triangle Site seeks permission for a maximum of 250 flats in two blocks – Blocks A and B. The 250 unit maximum could be divided with Block A accommodating approximately 158 units and Block B accommodating approximately 92 units. Units would be principally one and two bedroom flats, with some two bedroom duplex accommodation. The overall proportions of 1,2 and 3 bedroom accommodation are envisaged to be as follows:

i)	1 bed	123	(49%)
ii)	2 bed	112	(45%)
iii)	3 bed	15	(6%)

- 4.111 It is pertinent to note that at the end of the local Planning Inquiry into (the then) draft Chapter 13 of the UDP, there was no outstanding objection from Argent St. George on the wording of Policy KC4 itself. Thus, para 3.20 of the Main Site Development Specification refers to agreeing thresholds for a significant proportion of affordable/low cost housing. Paragraph 5.35 of the Implementation Strategy makes it clear that thresholds for the delivery of housing, including affordable/low-cost housing, would be agreed with the LPA(s). Paragraph 5.37 of the Implementation Strategy goes on to point out that:

*"The delivery of affordable/low-cost housing would depend upon the necessary commercial arrangements and public subsidies being in place at each stage of the project and these are complex matters, for detailed discussion and agreement between the parties. It would be important to establish clear mechanisms to agree the various matters identified at para 2.9.19 of the Planning and Development Brief, probably in the form of planning obligations."*

- 4.112 However there was (and remains) a concern over an inappropriate emphasis on family housing, notwithstanding the comprehensive nature of the housing proposals described above.
- 4.113 The final wording of para 13.49 in the explanatory text states that Camden "will seek a significant proportion of family housing...". This wording reflects recommendations made by the UDP Inquiry Inspector, who commented upon the relationship between family housing provision and achieving the full potential of the site for high density development:

*"...unit size clearly has implications for density..."* (para 18.20 of the Inspector's Report)

*"And although I accept that family accommodation and high density development are not mutually exclusive, the provision of family units obviously has implications for the amount of residential and other development that the site can accommodate. It would be unfortunate to say the least if the Council's efforts to secure family housing meant that this highly accessible and central site did not achieve its full potential."* (para 18.23 of the Inspector's Report)

- 4.114 The mix of sizes proposed by the applicants takes due account of the adopted UDP Policy KC4, the final explanatory text, the Inspector's comments, the London Plan (which refers to a minimum of 1,250 units) and the Joint Planning and Development Brief (which looks for at least 1,800 units across the KCOA and Triangle), (NB the London Plan and Brief are discussed in subsequent sections), to optimise the provision of new, high density housing within King's Cross Central. The proposals therefore represent "full consideration of the site's housing potential" (page 16 of the Brief) and the best use of scarce urban land:

*"There is a growing need to make the best use of scarce urban land and maximise new housing in the Area and the Triangle, in order to help deliver the draft London Plan's housing target for Camden of 16,940 homes between 1997 and 2016 and the Government's Sustainable Communities Plan."* (2.9.5 of the Brief)

## Transport

- 4.115 Policies KC5-7 and KC9 are dealt with together in this section. Policy KC5 states:

*'The Council will grant planning permission for development proposals for the King's Cross Opportunity Area which improves public transport interchange and services and provide a safe and accessible environment for all users of existing and proposed public transport systems. Where appropriate developers will be expected to contribute to improvements to transport infrastructure'.*



4.116 Policy KC6 states:

*'Planning permission will be granted for development proposals for the King's Cross Opportunity Area that provide high levels of accessibility, facilities, and safety for pedestrians, cyclists and people with disabilities'.*

4.117 Policy KC9 states:

*'The Council will promote a unified approach to the design, appearance and location of the various surface and sub-surface transport services and features in order to achieve a townscape solution of the highest urban quality'*

4.118 Transport issues were addressed briefly earlier, under SKC1 and SKC2. Townscape issues were addressed under SKC4. The earlier text refers to the Transport Assessment and Green Travel Plan, which deal comprehensively with all of the issues raised in KC5, KC6 and KC9, with further information about pedestrian, cycle and disabled access issues within the Landscape Proposals Plans and within the accompanying Public Realm Strategy.

4.119 The submitted development proposals would improve public transport interchange and services and make a significant, positive contribution towards a safe and accessible environment for all users, with high levels of accessibility, facilities and safety for pedestrians, cyclists and people with disabilities.

4.120 The Transport Assessment and Green Travel Plan demonstrate and explain that:

- KXC is located at one of the most accessible transport interchanges in the country and is quoted in the London Plan as having the best public transport accessibility in London. There are currently 6 Underground lines, 3 mainline rail stations and bus connections in the vicinity. By the time King's Cross Central commences, St Pancras will be an international interchange for the Channel Tunnel Rail Link.
- The development proposals would deliver significant improvements to existing walking and cycling conditions. KXC would provide a high quality pedestrian environment, with the creation of new public spaces. The alignment of the Boulevard and Long Park, creating a central north/south spine for KXC linked by Granary Square, offer an integrated pedestrian environment, with significant amounts of high quality public open space. East-west linking routes, including the improved routes along the canal and Goods Way, would improve connections between Camden and Islington.
- All routes in the road hierarchy would have pedestrian links, with wide pavements and planting zones where possible. It has been an aim to limit on-street parking for amenity reasons, providing planting and generous pavement space, together with high quality street furniture including seating and facilities for cyclists.
- Cyclists would be able to travel on-carriageway on all internal roads that provide local access to individual development plots and segregated cycle lanes are proposed on the adopted highways passing through the site (Pancras Rd and Goods Way). The proposed cycle routes would link to the London Cycle Network in the local area.

- The development proposals include a new entrance into the Underground network, within a new building along 'the Boulevard'. This new infrastructure would improve the integration between the new development and public transport infrastructure.
- The KXC proposals have been designed to accommodate Network Rail's aspirations for a new western concourse for the enhancement of King's Cross Station (as addressed under SKC2 above).
- The development proposals could accommodate the proposed Cross River Tram (CRT), the alignment and timescale of which is uncertain. The development proposals provide for a number of potential CRT alignments based on Good's Way and York Way.
- The KXC development proposals would not prejudice the provision of a new station at Maiden Lane. Moreover, the redevelopment of KXC is likely to be a catalyst for further land use and economic changes in the area (as addressed within the applicants' Regeneration Strategy).
- The development could facilitate and encourage the provision of new / diverted /extended bus routes through the site, improving public transport permeability to the King's Cross area, and to adjacent areas. The primary roads and junctions within the development have been designed to accommodate new 'bendi-buses' running between the stations in the south and the Triangle Site in the north.
- Following the development proposals, with some local bus service enhancements, the Public Transport Accessibility Level (PTAL) would be 5/6 (high-very high ) for all of the Main Site and 4 (medium-high) for the Triangle Site.
- The development would incorporate various measures to ensure that physical accessibility to people of all ages and to people with disabilities is provided. These would include:
  - Pedestrian friendly environment;
  - Pedestrian priority in key locations;
  - Pavements with tactile surfacing;
  - Minimal changes in footpath levels;
  - Carefully designed landscape proposals, including the provision of lifts and ramps where necessary.
  - Use of colours, lighting and information systems to help people understand.
- Planning and designing all parts of the new development to be used and enjoyed by everyone, including people with disabilities, would bring many benefits to all. For example, the result of designing for people in wheelchairs would ensure that the main pedestrian routes and footpaths are also safe and convenient for parents with children in pushchairs, for people who have wheeled trolleys or suitcases and for anyone who is frail or has difficulties in walking.
- Changes of level would be made easy by modern high speed lifts or by gentle ramps which are suitable for all members of the public to use. The footpaths and other circulation routes would have smooth non-slip surfaces which are as good for busy office workers as they are

for people with wheelchairs or for families with young children in push chairs. This convenience does not mean that there would not be variety. Fountains, water features, sculpture, play spaces, seats, trees and soft planting would provide enjoyable sensory experiences for people with disabilities and pleasure for everyone, from young children to elderly people.

- 4.121 In short, the development would be fully integrated with the public transport network, with safe, high quality access to existing, new and enhanced public transport facilities and services. The proposals take due account of proposed improvements within the area (explanatory text 13.52) and respond to the Council's desire to see good public transport links in the northern part of the site (explanatory text para 13.53). A high quality network of walking and cycleways would be provided, with strong cross-site links and good integration with existing and future facilities. Indeed, the proposed network would address each of the "options" listed at para 13.54 of the explanatory statement: pedestrian/cycle bridges, a dedicated pedestrian/cycle route from the northern part of the site to the stations, and connections into the London Cycle Network. The proposals would also help bring about a highly attractive public space between the stations, a fit setting for the Grade I listed buildings and legible access to underground, bus and taxi services.

## Car Parking/Storage

- 4.122 Policy KC7 goes on:

*'The Council will grant planning permission for development proposals for the King's Cross Opportunity Area where proposed car usage and car parking provision is at minimum levels necessary and where the provision of car free housing is maximised.'*

- 4.123 As explained earlier in relation to Policy SKC1, the proposals seek to minimise car usage and reduce traffic and pollution, drawing upon a range of measures as set out in the submitted Transport Assessment and Green Travel Plan. These measures include low, minimum levels of car parking and the provision of car free housing.
- 4.124 The issue of residential car parking ratios and car free housing within the KCOA was debated at the Local Plan Inquiry into the (then) draft UDP and was the subject of one of only two outstanding objections from the applicants, at the end of the Inquiry, as stated earlier in Section 4. The position is updated below, with reference to some of the Inspector's comments, conclusions and recommendations.
- 4.125 The development would restrict car parking to low, minimum levels, thereby maximising car free housing. The car parking provision would be well in accordance with the London Borough of Camden's adopted standards for the Main Site location and London Borough of Islington's adopted standards for the Triangle Site. The maximum car parking ratio at the completion of development would be 0.5 spaces per dwelling on both the Main Site and the Triangle Site. Within this ratio, at least 50% of the new housing would be car free<sup>1</sup>.
- 4.126 This car parking provision would fall well within the category of 'low' parking provision, as set out in the Sustainable Residential Quality (SRQ) studies that should guide the housing provision at King's Cross (as mentioned at para 13.19 of the explanatory text) and have informed the London Plan (see Appendix 6). It would also fall well within the proposed standard for the 'rest of

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<sup>1</sup> NB. If some larger units are allocated more than 1 space then more than 50% of the units would be car free.

Borough' in the emerging Replacement UDP, Deposit Draft i.e. a maximum of 1 space per dwelling (NB KXC lies outside the 'low provision area').

- 4.127 The proposed ratio represents an ambitious approach by the applicants, who have always contemplated a higher provision of car parking. However, the applicants' proposals are for 0.5 spaces per unit to take account of the Council's aspirations for a "significant proportion of car free housing" (explanatory text para 13.55). 50% is certainly a significant proportion.
- 4.128 The applicants recognise that the 0.5 ratio is higher than the "75% level" of car free housing mooted in the UDP explanatory text. That would equate to an average ratio of 0.25. However, the 0.25 ratio is not policy for this site and the applicants have always made it clear that the 0.25 ratio is unachievable. The applicants agree with the aspiration to reduce car use as far as possible but regard 75% car free housing as an inappropriate, disproportionate response. Their evidence submitted to the local Public Inquiry into the (then deposit draft) Chapter 13 of the UDP objected to the statement:

*"The Council will seek overall housing provision that is 75% car free".*

- 4.129 The Council then put forward supported amendments which would amend the text to refer to "a target of 75% car free". The view expressed and maintained by the applicants was that there was no rationale for the particular figure of 75%, which effectively pre-judges Policy KC7. Moreover, the applicants emphasised it is one thing to provide, say, 50 units that are 'car free' and market these successfully. However, it is quite another to provide, and attempt to market successfully, 1,000 or 2,000 units on the same basis, particularly where the aim is to achieve balanced communities. Accordingly, the applicants' suggested the statement should be deleted or altered to introduce more flexibility, for example, by referring to the Council seeking to achieve a proportion of car-free housing within a defined range of values.
- 4.130 Many of the points made by the applicants to the local Public Inquiry were reaffirmed by the Inspector in his report. The Inspector highlighted his unease at 75% car-free housing (i.e. an implied 0.25 car parking spaces per unit) at King's Cross and recommended changes to the explanatory text. The adopted UDP now refers to 'a significant proportion of car-free housing possibly up to about the 75% level', in line with the Inspector's recommendations.
- 4.131 It is pertinent to consider the conclusions of the local Public Inquiry Inspector in reaching his recommendation. The main salient points are summarised below with key quotes from paragraphs 22.4, 22.5 and 22.7 included as Appendix 3:

- Car free housing schemes are few and far between and there is no precedent for car free housing across a mixed use project such as KXC;
- Car-free housing on this scale must be approached with caution (para 22.4 of the Inspector's report);
- 75% car-free housing on this major development would be widely perceived as a considerable marketing challenge (para 22.4 of the Inspector's report);
- There can be no certainty that 75% car-free housing is achievable or desirable (para 22.4 of the Inspector's report);
- The success or otherwise of city car club schemes is largely unproven (paragraph 22.4 of the Inspector's report);
- It is car use rather than car ownership that is the key to the London Borough of Camden's aim to secure a sustainable form of development (para 22.5 of the Inspector's report);

- Minimising car use is likely to depend primarily on the London Borough of Camden's ability to secure an integrated package of improvements to the local transport arrangements (para 22.5 of the Inspector's report);
- Most importantly, the 75% figure would be viewed as a guideline, not a requirement that might justify the refusal of an otherwise acceptable development. As reported by the Inspector at the Inquiry, the Council's witness confirmed this point directly, in cross-examination by Counsel for the applicants (para 22.7 of the Inspector's report).

4.132 In summary, the proposed car parking ratio is challenging and ambitious and in line with adopted and emerging UDP Policy. The applicants have responded to the Council's desire to see car-free housing and are proposing a development with parking at low, minimum levels with 50% or more of the units being car-free. Furthermore, the proposed development contributes positively to the "integrated package of improvements to the local transport arrangements" that is held to be the key to minimising car use, as discussed above under SKC1, KC5 and KC6.

### Multi Storey Car Park (MSCP)

4.133 The KXC proposals include a MSCP providing for a maximum of 800 spaces. This format would help provide parking levels for a range of on-site uses consistent with UDP ratios, while avoiding unnecessary earth removal associated with additional basements, or compromising density objectives. It would also provide a noise shield for other uses, against the CTRL embankment. The MSCP offers an opportunity to establish and market centralised facilities for a city car club, and electric charging and/or LPG points (in accordance with explanatory text para 13.57).

4.134 A fuller description of the MSCP proposals is given in section 6.7 of the Transport Assessment including the reasons for its proposed construction early in the development programme. The applicants currently favour managing the MSCP on a 'right to park' basis rather than allocating spaces to a particular use or user, but they would address such issues in a Car Park Management Plan to be submitted alongside any application for approval of reserved matters for the MSCP.

### Design and Views

4.135 Policy KC8 states:

*'The Council will grant planning permission for development proposals in the King's Cross Opportunity Area with a very high standard of design that capitalises on the remaining high quality architectural and engineering works and;*

- *Protect the strategic views across the Opportunity Area to St Paul's Cathedral and, where appropriate, views to and from important local landmarks;*
- *Achieve an attractive, safe, legible and stimulating environment for resident, worker and visitor alike;*
- *Achieve a high degree of physical integration with the surrounding area; and*
- *Promote sustainable design principles and also maximise opportunities for improved energy efficiency to limit green house gas emissions'.*

4.136 All of the issues raised by this policy are addressed above, within Section 1 and within the earlier part of Section 4, under SKC1 and other policies.

4.137 In relation to Strategic Views, Section 1 explains how Parameter Plans KXC014 (Maximum Building Heights) and KXC015 (Strategic Views) for the Main Site together show that no new

buildings, plant or other built development would breach the Development Plane heights for the Parliament Hill and Kenwood House View Corridors (para 4.70 (i) of the Development Specification). In many parts of the Main Site, the proposed maximum building height is well below that permitted by the Strategic View Corridors and Development Planes (para 4.70 (ii) of the Development Specification).

4.138 The Strategic Views do not cross the Triangle Site.

4.139 Policy KC10 states:

*'The Council will grant planning permission for development proposals for the King's Cross Opportunity Area to include well managed and maintained high quality open spaces that;*

- *Provide recreational areas accessible to where people live and work;*
- *Reincorporate a network of linkages for pedestrian and cycle ways through the site;*
- *Protect and enhance Camley Street Natural Park and the Regent's Canal; and*
- *Complement and separate groups of buildings and other features'.*

4.140 All of the topics/issues raised by this policy are addressed above, for example under SKC1, SKC4 and KC1. The proposed development is fully in accordance with KC10. The proposed development includes new recreational areas (for example, within/around the gasholder guide frames and within Long Park) and these would be highly accessible to both new and existing communities. For example, the proposed bridge link BR3 would provide links to/from Somers Town. The impact of this and other development on the Natural Park and Regent's Canal is addressed within the Environmental Statement (ES). The ES also identifies further mitigation measures, referring to the applicants willingness to work with the London Wildlife Trust on a new visitor centre for the Park and contribute towards design costs.

## Heritage

4.141 Policy KC11 states:

*'The Council will grant planning permission for development proposals for the King's Cross Opportunity Area that:*

- *Preserve listed buildings or structures and their setting;*
- *Preserve or enhance buildings, structures and other features of character and historic interest, and their setting, within the Conservation Areas; and*
- *Preserve remains of significant archaeological importance and their settings'.*

4.142 The townscape issues raised by this policy are addressed under SKC4 above. The proposed development would preserve and enhance a number of listed and other historic buildings and structures and their setting and provide for the re-erection of the listed triplet of gas holder guide frames, alongside the (relocated) guide frame of gas holder no.8. This is a costly but appropriate exercise, given the townscape and symbolic significance of the guide frames. There is widespread public support for re-using the guide frames, as demonstrated through the various consultation exercises undertaken by the applicants over the last three years.

4.143 "Harnessing the value of heritage" has been one of Argent St George's ten overarching principles since initiating ideas for the site in 2001 (Principles for a Human City, July 2001). In evolving the

comprehensive regeneration proposals that are now put forward for outline planning and other consents, the master planners have sought to reflect, and benefit from, a proper assessment of the character, value and significance of the historic buildings, structures, surfaces and wider Conservation Areas. Indeed embedding the best historic buildings is one of the three main influences that underlies the evolution of the application scheme, together with creating a network of safe pedestrian routes and learning from the urban grain of central London (Framework for Regeneration, page 22).

- 4.144 The proposals recognise that heritage buildings and features are a positive asset and seek to re-use heritage buildings and bring disused properties into use, as an integral part of the sustainable regeneration of the area. The Main Site application seeks planning permission to undertake works of alteration to these buildings and structures to facilitate their refurbishment for specified uses, as set out in the Development Specification, Table 2. The refurbishment principles that the applicants intend to follow in subsequent stages are set out in Initial Conservation Plans for each retained building (see Development Specification para 4.49). Furthermore, historic items of streetscape and street furniture would be salvaged and re-used.
- 4.145 Taking account of all the constraints and aspirations influencing the site's future, there are some buildings which are felt to compromise the overall objectives for the scheme. These are buildings which would constrain and prevent the structure of new routes and public spaces which are fundamental to the foundations for a new development framework. These routes and spaces provide the connectivity, permeability, legibility and template for the introduction of new buildings and land uses, that both the local planning authority (Joint Planning & Development Brief, para 3.2.2) and the applicants consider important to deliver sustainable regeneration.
- 4.146 Where conflicts have occurred between competing objectives, the applicants and their team of advisers have analysed the advantages and disadvantages of retaining the building or structure and/or the possibility of relocating it, compared to the merits of the application scheme. Only when demolition has clear benefits for the total regeneration scheme has a case been made for demolition of all or part of a heritage structure.
- 4.147 The proposals therefore represent a careful balance between the protection of heritage and other social and economic considerations, to fulfil wider policy objectives. The explanatory text to KC11 recognises this 'balance' and anticipates the necessary removal of some heritage building and features, provided these can be justified in the context of PPG15 (para 13.68 of the UDP). The results of this analysis are set out in the supporting statements for the relevant Listed Building and Conservation Area applications.
- 4.148 On archaeology, the Environmental Statement concludes that the impacts of the development are likely to be typical of those to be seen on any significant development site anywhere in London (para 10.7.13). The proposals would not impact upon any Archaeological Priority Area and there is no need for any intensive archaeological evaluations 'pre-determination' of the outline planning applications. Rather, mitigation would be by watching brief (para 10.7.9).
- 4.149 The proposals are therefore consistent with Policy KC11.

## Integration, Regeneration and Community Development

- 4.150 Policy KC12 states:

*'The Council will grant planning permission for development proposals for the King's Cross Opportunity Area, which seek to ensure that:*

- a) *the benefits of and impacts from the development take account of the needs for local communities, employees and other visitors;*
- b) *local communities and businesses in the surrounding area are able to engage constructively in the development process and the design and content of the scheme; and*
- c) *effective links with wider regeneration initiatives in surrounding areas are established'.*

4.151 All of the topics and issues raised in KC12 are addressed under other policies above, in particular SKC1 and SKC2. The KXC proposals fully accord with KC12.



## 5.0 ADOPTED CAMDEN UDP, MARCH 2000 AND CAMDEN REPLACEMENT UDP, DEPOSIT DRAFT, JUNE 2003

5.1 As highlighted at para 4.4 of this Statement, the development plan for the Main Site comprises:-

- Adopted Chapter 13 (known as Alteration No.1) of the Camden UDP, April 2003 (which supersedes the King's Cross chapter of the adopted UDP, March 2000);
- The remaining chapters of the adopted Camden UDP, March 2000 and;
- Alteration No.2 – Affordable Housing and Mixed Use Policies – of the Camden UDP which was adopted in January 2004 (and which supersedes the affordable and housing policies in the adopted Camden UDP, March 2000).

5.2 Whilst not forming part of the development plan, a material consideration is the Camden Replacement UDP, Deposit Draft, June 2003. The document is at a relatively early stage in the process towards adoption. Therefore, the weight attached to it should be relatively limited.

5.3 This section of the Statement groups together policies in the adopted Camden UDP, March 2000, Alteration No.2 and the Camden Replacement UDP, Deposit Draft, June 2003, topic by topic. Section 9 in the Deposit Draft Replacement UDP is the same as Chapter 13 in the adopted UDP, and has already been dealt with in the previous section.

### Location and Development Content

5.4 Policy RE4 of the adopted UDP seeks to guide new development to locations which reduce the need for car journeys and which permit the choice of more energy efficient public transport. It states:

*“The Council has defined the following areas as having the public transport accessibility necessary for land uses that are major generators of travel demand:*

- a) *King's Cross Opportunity Area;*
- b) *Central London Area;*
- c) *Major Centres;*
- d) *Kentish Town and West Hampstead District Centres ...”*

5.5 Similarly, draft Policy SD5 (Location of development with significant travel demand) states:

*‘The Council will apply a sequential test to the granting of planning permission for development that significantly increases travel demand in the following order of preference:*

- a) *King's Cross Opportunity Area; Central London Area; and Town Centres except for Hampstead;*
- b) *Locations at Town Centres except for Hampstead; and*
- c) *Locations outside areas a) and b) taking into account their accessibility by a choice of means of transport; their likely effect on overall travel patterns and car use; and the likely impact of the development on the vitality and viability of existing centres’.*

5.6 The KXC proposals clearly accord with these policies. The proposals comprise high density, mixed use development (including uses that attract significant trips such as retail, office employment, higher education, leisure and tourism) on a site which is an important existing transport node and is acknowledged to have the best public transport accessibility in London

(para 5.37 of the London Plan) with further improvements both planned and underway. Paras 6, 20 and 21 of PPG13 "Transport" stress the importance of making full use of the potential of a site to avoid the inefficient use of land and that such sites should be allocated for travel intensive uses such as offices, retail and commercial leisure. Similar guidance is set out in para 1.37 of the explanatory text in the UDP Review. The proposed mixed use development in such a highly accessible area would help bring all activities within closer reach providing the opportunity for people to work closer to where they live and vice versa, thereby reducing the overall need to travel.

## Mixed Use Development

5.7 Policy RE5 of the adopted UDP (adopted in January 2004 as part of Alteration No.2) generally encourages and supports mixed use development. It points out:-

*"The Council will not grant planning permission for development that changes a mixed-use site into a single-use site or reduces the proportion of the floorspace in secondary uses, other than where:*

- i) proposals provide housing as the sole or primary use; or*
- ii) the developer can demonstrate that the current mix of uses is inappropriate; or*
- iii) the character of the area will not be adversely affected by a change in the balance of uses at the proposals site; or*
- iv) the proposal will realise other planning objectives.*

*The Council will encourage development to incorporate a mix of uses, including a contribution to the supply of housing. The amount of floorspace available to secondary uses should be maximised other than where:*

- i) proposals provide housing as the primary use; or*
- ii) a non-housing use is intended to meet an identified local need or realise other planning objectives.*

*In the Central London Area and the Major Centres, where a proposal would increase total gross floorspace by more than 500 sq. m. the Council will expect development to incorporate an appropriate mix of uses. Where appropriate up to 50% of the additional gross floorspace should be for residential use, except in the Hatton Garden area, where a smaller proportion may be accepted.*

*In considering the mix of uses and the appropriate contribution to the supply of housing the Council will have regard to:*

- i) the scale and location of the proposed development;*
- ii) the character, diversity and vitality of the surrounding area;*
- iii) other planning objectives, and the suitability of the site for mixed use development;*
- iv) the impact on sustainability.*

*Where mixed use developments provide 15 or more dwellings, affordable housing is required.*

*In appropriate cases the Council will accept the provision of secondary uses off-site".*

- 5.8 Policy RE5 is a general policy that applies throughout the borough and para 3.48 of the explanatory text highlights that different circumstances apply within the KCOA and that detailed policies for the development of the King's Cross railway lands site are contained in Chapter 13. Detailed consideration of RE5 is therefore inappropriate.
- 5.9 KXC's attributes as a major mixed use development have been amply documented above, particularly in relation to adopted Policies SKC2 and KC1. The range of land uses proposed would assist in reducing the overall need to travel, as well as helping to create and enhance diversity and vitality in the area. The proposals would also contribute to the supply of housing. The introduction of a significant new resident population as a result of the KXC proposals would re-introduce a 24 hour residential presence in the area.
- 5.10 Draft Policy SD3 of the UDP Review addresses mixed-use development. It states that the Council will expect development to incorporate a mix of uses, including a contribution to the supply of housing, and will not grant planning permission for development that reduces the amount of floorspace in secondary uses, unless it considers that there is an over-riding need for a particular use on the site. However, para 1.33 of the explanatory text makes it clear that different circumstances apply in the King's Cross Opportunity Area and that Section 9 of the UDP Review (which replicates the adopted Chapter 13) contains detailed policies for its development. In so far as they need to, the KXC proposals accord with these borough-wide aspirations for mixed use development.

## Density of Development

- 5.11 Draft Policy SD4 (Density of development) of the UDP Review states:

*"The Council will grant planning permission for development that makes full use of the potential of a site and will not grant planning permission for development that makes inefficient use of land. In assessing density, the Council will consider:*

- a) *the character, amenity and density of the surrounding area;*
- b) *the nature of the site;*
- c) *the quality of the design;*
- d) *the type of development being provided;*
- e) *the availability of local facilities, services and open space;*
- f) *accessibility by public transport; and*
- g) *the potential impact on the local transport network.*

*High density development will be expected at locations in the Central London Area, Town Centres and other locations well served by public transport."*

- 5.12 The above criteria for high density development are clearly met by the KXC site. Density issues are fully explained in the previous section in relation to Policy SKC2.

## Economic Activities

- 5.13 Policy EC4 of the adopted UDP identifies areas with potential for business development. The policy states:

*'The Council has defined the following areas as having most potential for an expansion of business development:*

- a) King's Cross Opportunity Area;
- b) Central London area;
- c) Major centres; and
- d) Kentish Town and West Hampstead district centres.

*In assessing any development, the Council will apply the sequential approach and general criteria in Policy RE4 and will also consider the need for developments to be in keeping with the scale and character of the surrounding area. This consideration is also important in areas where there are existing buildings which do not reflect the scale and character of their surroundings. The Council will also apply Policy RE5 which seeks mixed uses'.*

5.14 Draft Policy E1 (Location of Business Uses) is similar to Policy EC4 of the adopted UDP. It states:

*"The Council will grant planning permission for office development in locations accessible by a choice of means of transport, in accordance with the approach set out in Policy SD5. The Council will grant planning permission for industry and warehousing in locations it considers to be appropriate in terms of the character of the area, access to the site and other land uses nearby. The Council will consider whether the development:*

- a) *is located in the King's Cross Opportunity Area, Industry Area, or other locations suitable for large scale general industry and warehousing;*
- b) *is located in the Central London Area, the Kentish Town Area, or other locations suitable for a mix of uses including light industry and local distribution warehousing;*
- c) *is easily accessible to the Transport for London Road Network and/or London Distribution Roads;*
- d) *has the potential to be serviced by rail or water;*
- e) *is, or will be, accessible by means other than the car;*
- f) *provides adequate on-site vehicle space for servicing;*
- g) *is well related to nearby land uses;*
- h) *protects residential amenity; and makes the best use of sites prejudiced by other industry and warehousing, noise/vibration generating uses, pollution and hazards'.*

5.15 The KXC proposals comply with Policy EC4 and draft Policy E1 in relation to offices. The King's Cross Opportunity Area is one of the most appropriate locations for an expansion of business/office development. As mentioned in relation to Policy RE4 and Policy SD5, King's Cross is an important existing transport node and is acknowledged to have the best public transport accessibility in London with further improvements both planned and underway. Locating new business development in this area would be in accordance with explanatory paragraph 1.37 of the UDP Review and paras 6 and 20 of PPG13 'Transport' which state that such sites should be allocated for travel intensive uses such as offices.

5.16 The applicants submitted representations to draft Policy E1 of the UDP Review pointing out that large scale industry and warehousing is not well suited to the KCOA and would fail to make full use of the site's potential. This is acknowledged in the Joint Brief, which says that "...new storage and heavier industrial activities are considered to be inappropriate to the Area and Triangle unless they directly support the railways and stations" (para 2.7.2). To the extent that some light industrial and/or some B2 uses are considered appropriate, this is already covered in Policy KC3. The applicants' representations therefore suggested that references to the KCOA accommodating industry and warehousing should be deleted from the policy (and also from supporting paras 7.10 and 7.22).

## Retail and Entertainment Uses

5.17 Policy SH3 of the adopted UDP addresses the location of new retail provision. It states:

*'The Council has defined the following retail hierarchy:*

- a) Major Centres;
- a) District Centres;
- b) Neighbourhood Centres;
- c) Local parades and individual shops throughout the Borough.

*In assessing retail developments, the Council will apply the sequential approach, explained in policy RE4. Applicants will be required to demonstrate that all potential options for their development in areas a) or b) have been thoroughly assessed before sites on the edges of either a Major or District Centre or, sequentially, sites out of centre are considered for development. Neighbourhood Centres and local parades are generally considered to be inappropriate locations for large scale retail development. In assessing any development the Council will apply the general criteria in policy RE4 and will also:*

- *Ensure that the proposal will be of such a scale which would not have an adverse effect on the vitality and viability of the existing or surrounding areas;*
- *Ensure that the proposal is readily accessible on foot and can be served by a choice of means of transport, including public transport;*
- *Consider the need to reduce car travel; and*
- *Consider the cumulative effects of recently completed developments and of outstanding planning permissions in the catchment areas of affected areas'.*

5.18 Draft Policy R1 is concerned with the location of new retail and entertainment uses, it has a similar focus to Policy SH3 in the adopted UDP. It states:

*"A – Shops and services*

*The Council will grant planning permission for development for shopping and service uses (Use Classes A1 and A2), and markets (sui generis use) in Central London Frontages, Town Centres and Neighbourhood Centres.*

*In assessing development for shopping and service uses and markets, the Council will consider whether it could be accommodated in any of these locations before edge-of-centre sites, or sequentially, sites out-of-centre are considered for development.*

*B – Food and drink and entertainment*

*The Council will grant planning permission for development for food and drink uses and licensed entertainment (in Use Classes A3, D2 or sui generis) in Central London Frontages, Town Centres and the King's Cross Opportunity Area.*

*In assessing development for such uses, the Council will consider whether it could be accommodated in any of these locations before sites on the edges of Central London Frontages and Town centres; or, sequentially, sites elsewhere are considered for development. Neighbourhood Centres are considered a suitable location for small-scale food and drink uses."*

5.19 Draft Policy R2 of the UDP Review deals with the general impact of retail and entertainment uses. It points out:

*'The Council will only grant planning permission for development for shopping and service uses, food and drink uses, licensed entertainment and markets (in Use Classes A1, A2, A3, D2 or sui generis) where it considers the development:*

- a) *will not cause harm to the character, function, vitality, viability or the area, or of other areas it affects; and*
- b) *is readily accessible by a choice of means of transport, including by foot and public transport, and by late night public transport if late night opening is proposed.*

*The Council will consider the cumulative effects of a development, having regard to existing provision and valid planning permissions with potential to be implemented, and also the need to reduce car travel.*

*Neighbourhood Centres and smaller groups of shops are generally considered to be inappropriate locations for large-scale development and licensed entertainment'.*

- 5.20 The current proposals on the Main Site and the Triangle Site, which include up to a maximum of 45,925m<sup>2</sup> of Class A1, A2 and A3 floorspace, accord with Policy SH3 and draft Policies R1 and R2. The requirement to demonstrate that this component of the proposed development would not adversely effect the viability and vitality of surrounding centres is fully addressed in the Retail Impact Assessment.
- 5.21 There is however an inconsistency in draft Policy R1, namely that, whilst KCOA is explicitly identified as a preferred location for food and drink and entertainment uses, it is not explicitly identified as such for shopping and services. This is incongruous when Policy KC1 of Chapter 13 of the Camden UDP (addressed in Section 4.0 of this Statement) promotes comprehensive mixed-use development, with an explicit reference to "retail activities" as part of the mix of uses for the King's Cross Opportunity Area. Similarly, draft Policy R1 is inconsistent with Policy RE4 of the adopted Camden UDP, which identifies the King's Cross Opportunity Area as the first of four areas that has the public transport accessibility necessary for land uses that are major generators of travel demand, including "shopping".
- 5.22 Furthermore, draft Policy SD5 and paragraph 1.37 of the Camden UDP Review, continue to recognise King's Cross as a location suitable for development that significantly increases travel demand, including retail. Indeed, the King's Cross Opportunity Area is identified as the first preferred location for such development in the sequential test. The adopted, Joint King's Cross Opportunity Area Planning and Development Brief, January 2004 also confirms that new shopping development would be appropriate in this highly accessible central London site as part of a mixed use development. The applicants have submitted representations on the draft policy, pointing out the inconsistencies and suggesting that this be addressed at the next stage of the UDP review.

## Leisure and Cultural Uses

- 5.23 Policy LC2 of the adopted UDP addresses the location of the provision of leisure and cultural uses. It states:

*'The Council will guide proposals for leisure and cultural uses to the King's Cross Opportunity Area, the Central London Area and to the Major Centres. Outside these areas an exception may be made where the proposal is small in scale and meets local needs. All proposals should respond positively to the scale, character and mix of land uses in the surrounding area'.*

- 5.24 Draft Policy C3 of the UDP Review is similar to Policy LC2 in that it addresses new leisure uses in the borough (including play facilities). It states:

*'A – Location of Leisure Development*

*The Council will grant planning permission for leisure development in the King's Cross Opportunity Area, the Central London Area and Town Centres except for Hampstead. Outside of these areas, planning permission will only be granted for leisure development that:*

- 1. serves a local need;*
- 2. would not cause harm to the character or function of an area;*
- 3. will not harm residential amenity, the environment or transport networks;*
- 4. is easily reached by a choice of means of transport; and*
- 5. would attract travel primarily from the area within walking distance.*

*B – Play Facilities*

*The Council will require proposed developments that are likely to result in increased demand for play facilities to provide facilities that are safe, secure and accessible, and that meet a variety of needs. Provision will be required in:*

- a) residential developments of ten or more units;*
- b) retail schemes of 1,000 square metres or more;*
- c) new hospital developments and doctor's surgeries; and*
- d) other developments over 1,000 square metres that will attract a significant number of visits from members of the public'.*

- 5.25 Supporting para 10.9 within the adopted UDP states that provision should be directed towards areas in the Borough with a high degree of public transport accessibility. As already highlighted in Section 4.0 of this Statement in relation to Policies SKC1 and KC1, the proposals for KXC comply with this aim as they provide scope for leisure and cultural uses as part of a broad mixed land use development within the KCOA which is acknowledged to have the best public transport accessibility in London with further improvements planned and currently taking place. The Inspector's report into the (then draft) Chapter 13 of the UDP recognised (at para 1.17) that a successful mix of uses within the King's Cross Opportunity Area will include cultural and leisure facilities and Policy KC1 makes specific reference to leisure under two bullet points (see para 4.92 above). Draft Policy C3 further confirms that leisure development is part of the mix of uses anticipated within the KCOA.
- 5.26 The Main Site proposals seek permission for up to 35,050 sq m of assembly and leisure uses within Use Class D2, of which up to 8,475 sq m may be cinema(s). The Retail Impact Assessment concludes that existing and committed cinema provision in the surrounding area does not have the capacity, quality of facility, or diversity of film showings to meet current demand. A new flagship facility at KXC would help to meet demand without detracting from specialist cinemas in the area. Current gym and healthcare provision is inadequate and the area could benefit from a broader range of high quality facilities. In this context, the Triangle Site proposals include up to 3,500 sq m of new D1/D2 uses including indoor sports, fitness and related facilities.

## Tourism Development

- 5.27 Policy TM1 of the adopted UDP addresses proposals for new tourism development in the borough. It states:

*'The Council will encourage proposals for new tourist development which have as their focus the local environment, history or heritage, and will encourage existing attractions to include features designed to attract local visitors and increase local involvement. The Council will also encourage the development of tourist attractions and activities which reflect the multicultural character of the Borough's population and of London as a whole'.*

- 5.28 Policy TM2 of the adopted UDP goes on to deal with locations suitable for new tourism development (including conference and exhibition centres). It points out:

*'The Council will guide proposals for tourism uses to locations that are well related to the transport network and to established centres of tourism activity including, in particular, the King's Cross Opportunity Area and the Major Centres. All such proposals will be considered having regard to:*

- a) compatibility with residential, employment and environmental objectives for the area;*
- b) impact upon existing residential and business communities and support services;*
- c) effect on the retail character or function of the area;*
- d) implications for the capacity of the transport system and the quality of the environment;*  
*and*
- e) cumulative effects of noise and disturbance from traffic and parking on local amenity'.*

- 5.29 The policies identify the King's Cross Opportunity Area as an established centre of tourism activity to which the Council will guide proposals for tourism uses. The KXC proposals provide scope for tourism uses as part of the mixed use development. The site has the best public transport accessibility in London and advantage would be taken of the site's history, culture and environment. In particular, there is scope for new hotels, and for the heritage buildings embedded in the new urban fabric to be used for uses such as tourism and 'festival retailing'. The opportunity for these forms of retail provision, and the relationship with Camden Town and the Angel, are addressed in the Retail Impact Assessment Report.

## Community Uses

- 5.30 Draft Policy C1 of the UDP Review addresses new community uses. It states:

### *A – New Community Uses*

*The Council will grant planning permission for the development of community uses. Facilities with a local catchment should be located close to, and/or be easily accessible to, the community that they serve. Facilities likely to attract large numbers of people should be located where they are easily reached by public transport and should be fully accessible to people with disabilities.*

### *B – Health Care Facilities*

*The Council will support development in line with policy C1A that provides a net increase in the provision of health care facilities, including the relocation of existing facilities to more suitable sites or premises.*

### *C – Educational Facilities*

*The Council will grant planning permission for the development of education uses in line with policy C1A, provided that travel demand associated with the development would not harm the*



transport system. The Council will seek to ensure that, where appropriate, educational facilities are made available for public use outside of term time or opening hours.

#### *D – Child Care Facilities*

The Council will grant planning permission for child care facilities provided that there is safe and secure external play space on-site. The Council will seek the provision of child care facilities in workplace and educational developments of 1,000 square metres or more.

#### *E – Public Toilets*

The Council will only grant planning permission for developments that will attract large numbers of visits from members of the public, and for improvements to public transport interchanges, if adequate provision is made for public toilet facilities'.

- 5.31 The KXC proposals provide scope for community, healthcare, educational and childcare facilities. Paragraph 3.27 of the Main Site Development Specification (reproduced at para 4.39 of this Statement) provides a list of some of the types of facilities that could be provided within the floorspace applied for on the Main Site (up to 75,765 sq m). Thresholds for the phased delivery of community, health and educational uses would be agreed with the LPA(s) following the grant of planning permission.
- 5.32 With regards to health care facilities, the Triangle Site proposals provide additional scope for a medi-centre with an associated community room/space. Combined with other D1/D2 uses, this would provide up to 3,500m<sup>2</sup> on the Triangle Site.

## Design, Quality, Heritage and Views

### Environmental Quality

- 5.33 Policy EN4 (Providing safe and attractive public spaces) of the adopted UDP states:

*"The Council will seek to ensure that all public spaces and buildings create an attractive environment that promotes personal and collective safety and offers a high quality of design."*

- 5.34 The KXC development proposals both represent and promote a very high standard of design, as addressed under SKC4 above. The key concepts which have underpinned the design-led approach are amplified in the supporting Public Realm Strategy, the Urban Design Statement and the Urban Design Guidelines.
- 5.35 One of the core components of the framework to the KXC proposals is a high quality public realm incorporating many new high quality open spaces (shown on Parameter Plan KXC 004 for the Main Site). The consultation response (the "Framework Findings") to "A Framework for Regeneration" clearly demonstrates that making King's Cross clean and safe is the major priority for local people. The proposals provide for safe and accessible open space, not only for outdoor recreation and play but also to create venues for public events and a focus for the community.
- 5.36 The proposals would deliver innovative, flexible shared open space that is used throughout the day and evening and can incorporate different uses and activities. Management and maintenance would be of the highest order as set out in Sections 4 and 5 of the Public Realm Strategy. In this way, personal and collective safety would be promoted and enhanced.

## Design, Scale and Setting of Development

5.37 Policy EN13 (Design of new development) of the adopted UDP states that the Council will encourage high standards of design in all developments. As addressed in Section 4.0 in relation to adopted Policies SKC4 and KC8, the KXC proposals both represent and promote a very high standard of design.

5.38 Policy EN14 (Setting of new development) of the adopted UDP highlights:-

*“All proposals for development should be sensitive to, and compatible with, the scale and character of their surroundings. In determining applications for planning permission, the Council will have regard to the wider setting of the proposed development. In particular, the Council will take into account the following considerations:*

- a) *The character of the area, in terms of existing land uses and general environmental quality, including its degree of openness;*
- b) *The prevailing architectural style of the area;*
- c) *The scale and general proportions of surrounding development, including bulk, massing, height, footprint, typical plot sizes and the relationship to any nearby ‘landmark building’;*
- d) *The impact of the proposal on existing views and skylines; and*
- e) *The established pattern of public highways.”*

5.39 The equivalent policies in the UDP Review are draft Policies B1 and B2. Draft Policy B1 (General design principles) states:

*“The Council will grant planning permission for development that is designed to a high standard. Development should:*

- a) *respect its site and setting;*
- b) *be safe and accessible to all;*
- c) *improve the spaces around and between buildings, particularly public areas;*
- d) *be sustainable and easy to adapt;*
- e) *provide appropriate high quality landscaping and boundary treatments; and*
- f) *seek to improve the attractiveness of an area and not harm its appearance or amenity.*

*In assessing how the design of a development has taken these principles into account, the Council will consider:*

- g) *building lines and plot sizes in the surrounding area;*
- h) *the existing pattern of routes and spaces;*
- i) *the height, bulk and scale of neighbouring buildings;*
- j) *existing natural features, such as topography and trees;*
- k) *the design of neighbouring buildings;*
- l) *the quality and appropriateness of detailing and materials used;*
- m) *the provision of visually interesting frontages at street level; and*
- n) *the impact on views and skylines.*

*In exceptional circumstances, to re-establish cohesive building groups in areas of high design quality, the Council will only grant planning permission for new in-fill development that is designed as a ‘scholarly replica’ of the predominant pattern or architectural style.*

*Applicants should submit a 'design statement' with proposals for larger, developments and for sites in prominent or sensitive locations."*

5.40 Draft Policy B2 (Design and layout of large developments) continues:

*"The Council will only grant planning permission for large developments that:*

- a) connect to, and reinforce, the pattern and size of blocks and streets in the area and create new pedestrian-friendly links where appropriate;*
- b) provide easy movement for all, into and through the site;*
- c) include a mix of uses;*
- d) provide attractive, high quality public space;*
- e) take account of local climatic conditions; and*
- f) include sensitively designed parking and servicing, where necessary."*

- 5.41 The current proposals are sensitive to and compatible with the scale and character of the surroundings. However, it is not felt that the correct approach in the design and layout of the proposals would be to simply reinforce the pattern and size of blocks and streets in the area. That would be a lost opportunity. At King's Cross, the pattern and size of some blocks within the area creates barriers and impediments to movement and gives rise to concerns of community safety. "Reinforcing" the status quo would be a mistake and the applicants submitted representations to the UDP Review objecting to draft Policy B2 along these lines in September 2003.
- 5.42 To reflect the site's considerable potential, an Urban Design Statement has been prepared and submitted in support of the current proposals. One aim is to lessen the actual and perceived "barrier" effects arising from the site's partial enclosure by railway lines and bisection by the Regent's Canal (impeding free north-south movement). Accordingly, the public realm proposals would facilitate improved connectivity and permeability across the site and to the surrounding area with the provision of new and enhanced links, especially for pedestrians and cyclists.
- 5.43 The KXC proposals would provide for an integrated urban grain with continuity and human scale. The proposals seek to establish a variety of areas each with their own character and sense of place. The design approach is imaginative and seeks to complement and enhance the special character of the area such as the site's industrial heritage and buildings of character and quality.
- 5.44 Neither of the two outline applications seeks approval, at this stage, for the detailed design or external appearance of any new buildings. Such matters are reserved for subsequent approval by the LPAs. As mentioned under Policy SKC4 the applicants would submit an Urban Design Analysis with subsequent reserved matter applications for each phase of buildings.
- 5.45 Parking and servicing would be sensitively designed into the form of development, with some use of basements and below ground service roads within Development Zones A and B which could also meet King's Cross Station requirements (see Parameter Plan KXC 016). The proposed MSCP would be located against the CTRL embankment. On-street parking has been incorporated sensitively to maximise opportunities for landscaping.
- 5.46 Policy EN15 (Landscaping) of the adopted UDP states that the Council will seek a high standard of external landscaping in connection with all development. A series of Landscape Proposals Plans forms part of the Main Site application (Development Specification, Annex D). These fix the main components for each area of public realm. The applicants' proposals for the long-term

maintenance of such areas are given in the Public Realm Strategy, which sets benchmarks for world class standards of management and maintenance of the public realm which could be replicated in the surrounding area, contributing to wider scale regeneration. Landscape proposals associated with development on the Triangle site would be brought forward at the reserved matters application stage. The KXC proposals therefore comply with and embrace borough-wide objectives for high-quality design and landscaping.

## Conservation and Heritage

- 5.47 There are seven conservation policies in the adopted UDP, the most relevant of which are set out below. Policy EN31 (Character and appearance of conservation areas) of the adopted UDP states:

*“The Council will seek to ensure that development in conservation areas preserves or enhances their special character or appearance, and is of high quality in terms of design, materials and execution. Applications will be expected to provide sufficient information about the proposed development and its immediate setting to enable the Council to assess the potential effect of the proposal on the character or appearance of the conservation area”.*

- 5.48 Policy EN32 of the adopted UDP relates to the demolition of unlisted buildings in conservation areas. It states:

*“The Council will seek the retention of buildings which make a positive contribution to the character or appearance of a conservation area. In all other cases, consent for demolition of an unlisted building in a conservation area will normally be granted only where it can be shown that the building detracts from the character of the area or where the contribution of the proposed replacement when compared with that of the existing building would be of more or equal benefit to the conservation area. Before any consent for demolition is granted, the Council must be satisfied that there are acceptable detailed plans for the development and, in the case of substantial demolition, that the proposals safeguard the integrity of the building. ”*

- 5.49 Policy EN33 (Restoration and maintenance of buildings in conservation areas) of the adopted UDP states:

*“Where permission is necessary for the repair and maintenance of unlisted buildings in conservation areas, the Council will seek to ensure that the design and detailing of the proposed works is of a high standard, and materials are used which are sympathetic to, or which make a positive contribution to, the architecture and character of the building and its surroundings. Where practical and appropriate, the Council will welcome proposals which include the replacement of original features which have been lost, and the removal of past alterations and structures which detract from the character or appearance of the building and its conservation area settings.”*

- 5.50 Policy EN36 (Structures of interest in conservation areas) of the adopted UDP points out:

*“The Council will seek to ensure, where practicable, that structures that make a positive contribution to the character or appearance of a conservation area are preserved and retained in their setting. If this is not practicable, the Council will welcome their reuse elsewhere in the development.”*

5.51 Policy EN37 (Proposals outside conservation areas) of the adopted UDP states:

*“When assessing a proposal for development outside a Conservation Area which may affect its character or appearance, the Council will consider whether the development preserves or enhances the conservation area and may require additional information (as set out in EN31) before determining the application.*

5.52 Policies EN31-EN37 of the adopted UDP above would be replaced by draft Policy B7 as part of the UDP Review. This states:

*A – Character and appearance*

*The Council will only grant planning permission for development in a conservation area that preserves or enhances the special character and appearance of the area. The Council will not grant planning permission for development outside a conservation area that it considers would cause harm to the conservation area’s character, appearance or setting.*

*B – Demolition of unlisted buildings*

*The Council will not grant conservation area consent for the total or substantial demolition of an unlisted building that makes a positive contribution to the character or appearance of a conservation area, unless exceptional circumstances are shown that outweigh the case for retention.”*

5.53 There are three listed policies in the adopted UDP. Policy EN38 (Preservation of listed buildings) of the adopted UDP states:

*“There will be a general presumption in favour of the preservation of listed buildings, and all applications for Listed Building Consent will be considered having special regard to the desirability of preserving the building or its setting, or any features or special architectural or historic interest which it possesses.”*

5.54 With reference to the use of listed buildings, Policy EN39 of the adopted UDP explains:

*“The Council will seek to ensure that listed buildings are used for purposes which make a positive contribution to their fabric, interior and setting. Proposals for the continued use of buildings for the purpose for which they were originally designed, or for the reversion to that use where it has been changed, will be particularly welcomed and, where possible, supported, provided this would not be in conflict with other policies of the plan. Proposals that would result in the loss of architectural features, obscure the original plan, form, layout, structural integrity or otherwise diminish the historic value of the building will be resisted.”*

5.55 Policy EN40 of the adopted UDP addresses the restoration of listed buildings. It states:

*“The Council will seek the retention and repair rather than replacement of structural elements and other original features in a listed building. Only where original features are missing or have deteriorated beyond repair should they be replaced. For replacement work, the use of non-traditional materials will be resisted.”*

5.56 Draft Policy B6 (Listed Buildings) of the UDP Review is similar to Policies EN38, 39 and 40 of the adopted UDP. The policy points out:

*“To preserve and enhance the special interest of listed buildings, the Council will only grant listed building consent for:*

- a) the total or substantial demolition of a listed building where exceptional circumstances are shown that outweigh the case for retention; and*
- b) alterations and extensions to a listed building where it considers this would not cause harm to its special interest and character.*

*The Council will only grant planning permission for the change of use of a listed building where it considers this would not cause harm to its special interest and character. The Council will not grant planning permission for development that it considers would cause harm to the setting of a listed building.”*

- 5.57 The way in which the KXC proposals generally seek to preserve and enhance the special interest of listed buildings and their setting have been addressed in Section 4.0 above in respect of adopted Policies SKC4 and KC11. Similar considerations apply to Policies EN38, EN39, EN40 and draft Policy B6.
- 5.58 As pointed out earlier in this Statement, the proposed development would retain and refurbish many listed buildings and structures, including Stanley Building South, the Great Northern Hotel, the German Gymnasium, the principal buildings of the Goods Yard complex and the four gas holder guide frames. Proposals for their alteration in order to facilitate a range of specified new uses are spelt out in the Development Specification Table 2 and Annex E.
- 5.59 With specific reference to draft Policy B6, sub-paragraph (a) anticipates that ‘exceptional circumstances’ may justify the total or substantial demolition of a listed building, but sub-paragraph (b) states alterations and extensions will only be allowed where the Council considers this would not cause harm to the building’s special interest and character. There is no reference to ‘exceptional circumstances’ in relation to alterations and extensions. Thus, rather perversely, it appears it may be easier to justify the total demolition of a building under draft Policy B6, then to justify its alterations or extension. It seem unlikely that this was the Council’s intention. Accordingly, the applicants submitted representations objecting to this aspect of the draft policy principally on the basis that it does not reflect the guidance in PPG15 and, specifically, provides no mechanism for the matters identified at para 3.5 (iv) of PPG15 to be taken into account. This relates to the extent to which the proposed works would bring substantial benefits for the community, in particular by contributing to the economic regeneration of the area or the enhancement of its environment (including other listed buildings). On this basis, the applicants suggested a re-wording of sub-paragraph (b) of draft Policy B6, together with suggested amendments to some of the supporting text.
- 5.60 A limited amount of demolition is proposed where buildings or structures would constrain and prevent the structure of new routes and public spaces fundamental to the new development framework. Each such demolition proposal is justified against the criteria in PPG15 and against the adopted UDP Chapter 13 policies in its accompanying Supporting Statement.
- 5.61 The above policies apply borough-wide. Special circumstances apply at KXC because it is in an Opportunity Area. The explanatory text to Policy KC11 recognises that selective demolition may be necessary to fulfil wider policy objectives. Nevertheless the KXC proposals broadly accord with the thrust of the general UDP heritage policies, with their strong emphasis on retention, refurbishment, re-erection (of the gasholder guide frames), investment and re-use as an integral part of the mixed use redevelopment.

## Strategic Views

5.62 The adopted policy addressing strategic views is EN43. This states:

*'When assessing development proposals, the Council will protect the strategic views of St Paul's Cathedral and the Palace of Westminster identified by the Secretary of State for the Environment. The measure for protecting strategic views apply to all proposals including the replacement of buildings which currently obscure or mar the views and proposals for buildings within the shadow of existing high buildings'.*

5.63 Draft Policy B9 (Views) essentially amalgamates Policies EN43, 44 and 45 in the adopted UDP. It points out that:

*"A – Strategic Views*

*The Council will not grant planning permission for development within a viewing corridor of a strategic view as shown on the Proposals Map if the proposed height exceeds the development plane between the viewpoint and either the base of the lower drum of St. Paul's Cathedral or the general roofline of the Palace of Westminster.*

*The Council will not grant planning permission for development that it considers to cause harm to a strategic view within the defined 'wider setting consultation area' and 'background consultation area' as shown on the Proposals Map.*

*B – Important Local Views*

*The Council will not grant planning permission for development that it considers causes harm to the following public views:*

- a) St Pancras and King's Cross Stations from Pentonville Road;*
- b) panoramas from Primrose Hill, Parliament Hill and Kenwood;*
- c) prospects of, and from, Hampstead Heath; and*
- d) prospects of Regent's Canal."*

5.64 As mentioned in the previous section in relation to adopted Policy KC8, the KXC proposals would not cause harm to the two strategic views across the Opportunity Area to St. Paul's Cathedral (and, where appropriate, views to and from important local landmarks). With reference to important local views, the implications have been addressed through the Environmental Impact Assessment process. Overall, the Environmental Statement concludes that although some local views of landmarks would be lost, others would be created as a result of the development. Greater public access would also create more opportunities to appreciate views of the heritage buildings and their settings. Local views from Pentonville Road would remain unchanged; there would be no significant effect on the setting of the heritage buildings (para 9.8.55 in the ES).

5.65 Concerns have been expressed by the applicants that a strict interpretation of draft Policy B9B 'd) prospects of Regent's Canal' and supporting para 3.84 could needlessly sterilise development.

5.66 The applicants submitted representations to the Deposit Draft Replacement UDP that this supporting text was inappropriate for a number of reasons. The proposals would enhance the Regent's Canal and open up a number of new views e.g. around the relocated and re-erected gas holder guide frames.

## Transport and Car Parking

### Transport and Land Use

5.67 With regards to public transport accessible development, Policy TR1 of the adopted UDP states:

*'The Council will seek to ensure development which attracts a significant net increase in the number of trips is located in areas of the borough with a high level of public transport accessibility. The Council will not normally grant planning permission for such development unless it is satisfied that the public transport system in the vicinity of the site has, or will have, sufficient capacity to accommodate the net increase in passenger trips at an acceptable level of service'.*

5.68 Draft Policy T2 in the UDP Review addresses the issue of capacity of transport provision and is similar to Policy TR1 in the adopted UDP. It states:

*"The Council will only grant planning permission for development where it considers that all forms of travel associated with the development can be accommodated by:*

- a) the capacity of the existing transport provision; or*
- b) the capacity of planned transport provision that has fully secured funding and a firm start date; or*
- c) additional capacity and/or demand management, to be funded by the developer, and designed to cause the least environmental harm.*

*The Council will consider capacity taking into account the cumulative effect of all development proposals on transport provision."*

5.69 Draft Policy T2 is a potentially draconian policy that could prevent planning permission for key developments being granted should there be slippage in planned transport improvements. This is potentially worrying based on recent experience with major rail-based transport schemes in London. Concerns over a similar approach were addressed in great detail at the Examination in Public (EiP) into the draft London Plan in the context of Policy 3C.2 (Matching Development to Transport Capacity). The EiP Panel appreciated these concerns and recommended that the explanatory text to this policy be expanded to explain that matching demand to capacity is not a mechanistic exercise (Panel report para 5.8). The London Plan now does this, in addition to acknowledging that both development and transport improvements may be subject to some variation and that this should be taken into account (explanatory text para 3.165).

5.70 The applicants submitted representations to the Deposit Draft Replacement UDP in line with these concerns to the effect that draft Policy T2 should be re-cast to take into account the draft London Plan EiP Panel report and the way in which transport capacity matters are addressed in the adopted Joint Planning and Development Brief, January 2004 (para 2.3.7).

5.71 Nevertheless the KXC proposals do comply with this draft policy. The Transport Assessment concludes that the additional trip demands generated by the development can be satisfactorily catered for within the available capacity allowing for committed improvement to public transport facilities (para 1.11 of the TA).

5.72 Draft Policy T8 (Car free housing and car capped housing of the UDP Review) is similar to Policy TR16 of the adopted UDP and, to a degree, Policy KC7 of adopted Chapter 13 of the UDP, April 2003. It points out:



*“The Council will grant planning permission for car free housing in areas of on-street parking control. The Council will particularly seek car free housing or car capped housing in the following locations:*

- a) *the Central London Area;*
- b) *the King’s Cross Opportunity Area;*
- c) *Town Centres except for Hampstead; and*
- d) *other areas within Controlled Parking Zones that are easily accessible by public transport.*

*For car free housing and car capped housing, the Council will:*

- e) *not issue on-street residential parking permits;*
- f) *use planning obligations to ensure that future occupants are aware they are not entitled to on-street parking permits; and*
- g) *not grant planning permission for development that incorporates car parking spaces, other than spaces designated for people with disabilities, and a limited number of spaces for car capped housing in accordance with Council’s Parking Standards.”*

- 5.73 The applicants have responded to the Council’s aspirations for car free and car capped housing by proposing parking at low minimum levels. At least 50% of the units would be car free within an overall (average) ratio of 0.5 spaces per unit, as addressed earlier in relation to adopted Policy KC7.

## Regent’s Canal

- 5.74 The Regent’s Canal is identified in the adopted UDP as an Area of Special Character. A number of policies (RC1-12) aim to conserve and enhance the existing character of the Canal and to improve its potential for recreation, transportation and wildlife. These are RC1 (visual character), RC2 (scale), RC3 (views and skyline), RC4 (traditional uses and buildings), RC5 (historic features and structures), RC6 (recreation), RC7 (access), RC8 (green chain), RC9 (information facilities), RC10 (water space), RC11 (moorings) and RC12 (transport).
- 5.75 Draft Policies RC1 and RC2 of the UDP Review relate to the character and vitality of Regent’s Canal and building use along Regent’s Canal respectively. They effectively incorporate Policies RC1 – 12 in the adopted UDP. For this reason, draft Policy RC1 and RC2 are principally addressed here but, for ease of reference, Policies RC1 to RC12 of the adopted UDP are reproduced as Appendix 4 to this Statement. Draft Policies RC1 and RC2 state:

### Draft Policy RC1- Character and vitality of Regent’s Canal

*“The Council will only grant planning permission for development that will maintain or enhance the character and vitality of Regent’s Canal. The Council will consider:*

- a) *the existing openness or enclosure of the specific part of the Canal;*
- b) *if any structures encroach on, cantilever or bridge over the Canal, its banks or towpaths;*
- c) *if the height of the proposal reflects that of existing canalside buildings;*
- d) *the contribution made to the creation of active frontages onto the Canal;*

- e) *the provision for new public access to the Canal by opening up new footpaths, providing direct secure access onto the towpath from surrounding areas, or enhancing existing public access for all users;*
- f) *opportunities to provide public art, signposting and informative material along the Canal corridor;*
- g) *opportunities for reopening canal basins, particularly where this creates opportunities for new moorings, improved turning facilities for barges, or provides a focus for new activity; and*
- h) *opportunities to provide soft planting along the towpath or aquatic planting within the Canal to improve the quality of the towpath or to enhance biodiversity."*

5.76 Draft Policy RC2 (Building use along Regent's Canal)

*"The Council will not grant planning permission for development that would result in a loss of traditional uses and/or water-based leisure uses along Regent's Canal, unless the Council considers that it would improve the character and vitality of the Canal. The Council will consider whether:*

- a) *the building has remained vacant or underused due to a lack of demand for its existing use;*
- b) *the proposal improves direct access to and/or along the Canal;*
- c) *historic features and the architectural quality of the building are retained and enhanced;*
- d) *the development will provide a mix of uses, particularly for recreational, tourist or leisure purposes, to maximise the use and vitality of the Canal;*
- e) *the proposal will result in the loss of scarce canal-based facilities; and*
- f) *the proposed use is compatible with adjacent uses and does not have a negative environmental effect on the Canal."*

5.77 The Regent's Canal is an important feature of historic and visual interest in the townscape and, following the decline of traditional canal-related commercial activities, it is increasingly recognised as a valuable resource for water-based leisure activities; for its ecological value, and its potential for transportation and informal recreation. The KXC proposals would respect the canal, its built form, scale and historic context. At the same time the proposals seek to capitalise on the canal's positive contribution to the site and the surrounding area and this inevitably means some changes, for example to the canal walls. The proposals would enhance the canal's character, appearance and vitality, access, safety, and recreational use.

5.78 The Regent's Canal Conservation Area Statement recognises that there is a case for improving links and access to the Canal side and improving the perceived sense of security for those using the Canal (p25). It also refers to some 'negative features'. The 'negative features' include the absence of a publicly accessible link across the canal into the Goods Yard. A key element of the proposals for the site is the 'Boulevard' which would provide a strong north-south connection facilitating movement through the entire site. The proposals would include the removal of the existing Exel Bridge over the Regent's Canal and its replacement with two new bridges. The canal marks a strong division between the north and south of the site but the proposals would help reduce its 'barrier' effect to free north-south movement and enhance its use as a connector creating a balance between the upper and lower levels of the site and providing east-west links across the site. These proposals together with the proposed removal of some of the length of the canal wall, would help open up vistas and public access for all users.

- 5.79 A further 'negative feature' mentioned in the Conservation Area Statement is the filling station west of the Maiden Lane (York Way) bridge. The applicants seek conservation area consent to demolish this unlisted structure.
- 5.80 Parameter Plan KXC006 relating to the Main Site defines and describes a series of proposed landscaping, towpath improvements, lighting and other works along the Regent's Canal. These works include the following:
- New/refurbished access points to the towpath
  - Refurbishment/resurfacing of the towpath
  - Possible new mooring locations for barges (including some along the south side of the canal connecting to an esplanade along Goods Way at the upper level)
  - New towpath and underbridge lighting
  - New bridges across the canal; and
  - New signage and interpretation.
- 5.81 The proposals would help improve the pedestrian links and movement generally across the site (including improved connectivity to the Camley Street Natural Park). A new level of activity and vibrancy would also be made possible by introducing new uses in canal side areas, including the relocated gas holder guide frames and new pavillion buildings with active ground floor frontage onto the canal, and by opening up good connections to Granary Square and the Coal Drops. There would also be new uses in the refurbished Fish and Coal Offices - a distinctive waterfront building following the curve of the canal.
- 5.82 Parameter Plan KXC014 shows the maximum building heights. The height of new canal side buildings would respect its existing and historic scale and built form, commensurate with other urban design objectives, for example the provision of enclosure to Granary Square.



## 6.0 ADOPTED ISLINGTON UDP, JUNE 2002

- 6.1 As explained in paragraph 1.6 of this Statement, some of the proposals for KXC are on an area of land known as the 'Triangle Site' to the east of York Way. A separate outline planning application has been submitted to the London Borough of Camden and the London Borough of Islington for the development of the Triangle Site.
- 6.2 Recognition that the two main parts of the KXC site need to be treated together has informed the process of preparing the current proposals, not least because of the implications of realigning York Way westwards.
- 6.3 This interrelationship is now formalised in the Joint KCOA and Triangle Planning and Development Brief, adopted by the London Borough of Islington in January 2004. The Joint Brief therefore provides the most up-to-date and relevant guidance for the Triangle Site. Nevertheless the Islington UDP is still the adopted development plan for the eastern part of the Triangle Site, and this section assesses the proposals against relevant policies within it.

### Mixed Use Development

- 6.4 The Islington UDP was adopted in June 2002. Strategic Policy ST14 (Implementation) is a policy which applies throughout the borough. It states the Council will:

- “
- 13.1 *Secure the effective implementation of the policies set out in this plan, and encourage community involvement in the planning process.*
- 13.2 *Secure the efficient and sustainable use of land and buildings in the borough with encouragement being given to mixed-uses, both at the neighbourhood level and in individual buildings.*
- 13.3 *Ensure that scarce vacant and derelict sites are brought into use for appropriate purposes, consistent with the objectives and policies set out elsewhere in the plan*
- .....”

- 6.5 In line with the encouragement of mixed use development in Strategic Policy ST14, Local Policy Imp 5 (Mixed Use) states:

*“The Council will encourage mixed-use development, where appropriate, through the preparation of development briefs, its own regeneration schemes and through working with developers and local communities on particular development proposals.”*

- 6.6 The current proposals for the Triangle Site comply with both Policies ST14 and Imp 5. With regards to objective 13.1 of Policy ST14 to encourage community involvement in the planning process, this Statement demonstrates that the current proposals have emerged from extensive consultation exercises with a wide range of stakeholders in the planning process. As highlighted in Section 4.0 of this Statement in relation to Policies SKC1 and KC12, the applicants' use of innovative processes of community involvement has recently been acknowledged in a report for the Office of the Deputy Prime Minister and in CABA 'Festive Five' awards.
- 6.7 In respect of objectives 13.2 and 13.3 of Policy ST14 and Imp5, we would stress that the current proposals are for a sustainable, mixed use development which seek to regenerate the area by

bringing back into full use vacant and underused land. In particular, the application for the Triangle Site seeks permission for:

- Up to 18,000m<sup>2</sup> of residential floorspace, providing a maximum of 250 flats across two blocks;
- Up to 2,500m<sup>2</sup> of retail floorspace within use classes A1, A2 and A3; and
- Up to 3,500m<sup>2</sup> of Class D1 and D2 uses including a health and fitness centre, a medi-centre providing surgery facilities with an associated community room/space and a creche/day nursery facilities.

- 6.8 Policy H16 requires schemes of over 15 dwellings to include 25% affordable housing. The London Borough of Islington have since adopted revised Supplementary Planning Guidance on affordable housing (April 2003) which seeks an interim minimum percentage requirement of 35% (25% social rented and 10% intermediate housing) (para 5.3) with an aspiration for 50%. In commenting on the draft of this guidance on Affordable Housing, the applicants questioned the use of SPG to alter UDP policy.
- 6.9 Nevertheless the proposals for the Triangle Site provide for up to 35% of the dwellings to be for affordable housing, incorporating key worker housing, subject to appropriate levels of grant funding, as set out in the Triangle Explanatory Statement. The mix of unit sizes envisaged is given in Section 4.0 of this Statement in connection with Policy KC4.
- 6.10 Policy R1 (Recreation Facilities) of the UDP states:

*“The Council will encourage new and improved facilities for leisure, culture and recreation in the borough, directing resources towards those areas and population groups that currently have least choice. It will encourage co-operation with both private and voluntary sectors as well as other boroughs, and will work closely with all providers to support dual and alternative uses of suitable buildings and spaces”.*

- 6.11 The proposals for the Triangle Site comply with Policies R1. The proposals include provision for a health and fitness centre. These uses would be accommodated in Block C and the block has been designed flexibly so that it could be occupied in a variety of ways by a combination of uses in different formats and in different proportions. The uses could include a sports hall, swimming pool and other indoor sports, fitness and recreation facilities including a gymnasium. The proposals could also provide for community room/space within the medi-centre.

### Area-Based Policies

- 6.12 The Islington part of the Triangle Site, i.e. east of the existing York Way, is termed the Islington Triangle in this UDP. It features in three designated areas within the UDP. Given the relatively small size of the area it does not have the prominence that the KCOA has in the Camden UDP.
- 6.13 The Council has identified four key priority areas for regeneration. One of these priority areas for regeneration is King's Cross. The Triangle Site, along with adjoining areas east of York Way, lies within the King's Cross priority area. The focus for regeneration within this King's Cross priority area is to transform it into a vibrant and distinctive new quarter for London, and to maximise the benefits for Islington arising from the development of King's Cross Central, which is acknowledged to be mainly located in Camden (para 6.4).

6.14 Policy E12 (Priority Areas) states:

*“Within these areas, the Council will seek to:*

- i) Secure employment opportunities for local residents;*
- ii) Develop partnerships with a wide range of partners from the public, private and voluntary sectors to secure comprehensive and sustainable regeneration;*
- iii) Identify locations for business and other uses;*
- iv) Attract and assist new economic sectors and strengthen existing sectors particularly those which meet local needs for goods, services and employment;*
- v) Secure the development or re-use of vacant and underused land or buildings;*
- vi) Bring forward new investment opportunities;*
- vii) Improve the environment.”*

6.15 In compliance with the regenerative objectives of Policy E12, the development of the Triangle Site offers an exciting opportunity to bring into productive use an unused area that has long been earmarked for development. The Triangle Site development would significantly improve the local environment, and would aid in integrating KXC with the surrounding areas. The Triangle Site development could also act as a catalyst for further improvements and new investment and development opportunities along York Way.

6.16 The Triangle Site offers an opportunity to provide a substantial amount of residential accommodation combined with retail and other publicly accessible facilities that can serve the local community (such as leisure and community uses). There is also considerable potential for the Triangle Site development to help link the KXC Main Site to the predominantly residential area to the east, and an opportunity to enhance and extend northwards the street quality of York Way by activating the street frontage.

6.17 The UDP also identifies a number of ‘Special Policy Areas’, one of which is King’s Cross. The Special Policy Areas are shown on the Proposals Map and described in Schedule 12. The King’s Cross Special Policy Area is approximately coincident with the King’s Cross priority area for regeneration and is described in Schedule 12 as follows:

*“Area bounded by York Way, the North London Line, Caledonian Road, Copenhagen Street, Clondesley Road, Chapel Market, Baron Street, Pentonville Road, Halford Place, Percy Circus, Vernon Rise and King’s Cross Road.”*

6.18 Implementation Policy Imp18 gives more detailed guidance, stating that:

*“Within the King’s Cross area, the Council will pay special attention to ensure that:*

- i) Adverse environmental impacts associated with a proposed infrastructure projects and developments are minimised;*
- ii) Regeneration monies (including single regeneration budget, estate renewal challenge fund and conservation area partnership schemes) are used effectively to help revitalise the area; and*
- iii) The local community receives a fair share of the benefits which these projects and the development of the area of opportunity will generate.”*

Supporting paragraph 13.6.12 states that for the period of the Plan, the Council will seek to:

- “
- *Promote high quality mixed use development which regenerates vacant land and buildings and address the needs of the local community;*
  - *Enhance the street environment and create a “walkable neighbourhood” that is safe, easy and pleasant to use by people on foot ....”.*

6.20 The KXC mixed use proposals address these policy requirements and accord with them. As mentioned earlier at para 6.4, the proposals have emerged from extensive consultation exercises and address priority needs of the local community, especially the need for a safe, clean and high quality public realm and an integrated network of pedestrian and cycle routes to improve connectivity and permeability. Adverse environmental impacts have been minimised through the EIA process and the proposals would both regenerate vacant and under-used land and enhance the street environment, with a new ‘walkable neighbourhood’ (see paras 4.63 to 4.68 above).

6.21 The Islington part of the Triangle Site is identified as one of 28 ‘Areas of Opportunity’ (shown on the Proposals Map and described in Schedule 13 of the UDP) to which Policy Imp11 applies. This states:

*“The Council have designated ‘areas of opportunity’ where attention will be focused with a view to attracting investment to achieve the plans objectives.”*

6.22 The supporting paragraph (13.39) states that the process of assessing and evaluating development options for areas of opportunity will involve:

- Site assembly and feasibility studies to identify development potential of sites;
- Consultations and Council consideration of preferred uses; and
- Development strategy to bring sites into use for the agreed purposes.

## Design

6.23 Policy D4 (Designing in Context) of the UDP states:-

*“Proposals for new and altered buildings should acknowledge the most important elements of the urban context and create a positive and appropriate relationship with surrounding buildings and spaces. Particular attention should be given to:*

- i) *defining the public and private spaces through reinforcing building lines and encouraging appropriate infilling of gaps;*
- ii) *appropriate windows and window arrangements on buildings;*
- iii) *ensuring that the building relates to the street and/or waterside setting as appropriate by avoiding faceless walls and including entrances;*
- iv) *encouraging a mix of uses; and*
- v) *ensuring all alterations and extensions are sympathetic to the building and its surroundings.*

*Within this framework the Council will encourage architectural innovation and imaginative design solutions.”*



6.24 As highlighted in the submitted Triangle Explanatory Statement (TES), the Triangle Site proposals would provide a mix of uses including a substantial amount of residential accommodation, retail and related uses (within use classes A1, A2 and A3), and leisure and community uses.

6.25 The TES identifies a number of key objectives that are in keeping with Policy D4 and are as follows:

- Develop the York Way frontage to an appropriate scale and ensure that the ground level offers publicly accessible uses that will animate the streetscape;
- Develop the other perimeters of the site to create buffers against noise from adjacent railways;
- Make the centre of the site an amenity and focal point;
- Orientate public entrances to respect and enhance east-west pedestrian movement.
- Create a focus for the long view up York Way; and
- Define a northern gateway to King's Cross Central.

6.26 The design response to these objectives takes full advantage of the triangular shaped site and varied surrounding levels. Buildings are proposed around the perimeter of the site to define a triangular amenity space at the heart of the scheme. The heights of the buildings would be varied. The east side facing the Bemerton Estate would be kept relatively low; buildings along York Way would be higher, though low enough to avoid York Way feeling canyon like; and the tallest buildings would be to the north where overshadowing would not be a problem. The design strategy exploits the surrounding site levels to allow all available street frontages to be developed for publicly accessible uses with parking and servicing fitting neatly into an undercroft. Further details on the design response are set out in the TES.

6.27 Policy D9 of the UDP addresses the issue of high buildings. It states:

*"The Council considers that Islington is an area where high buildings are inappropriate, and will oppose any proposals for such buildings".*

6.28 In relation to the Triangle Site, however, the Brief for the KCOA and Triangle states (box following para 3.3.45):

*"Variation in building heights and massing should be used to avoid over-dominating York Way and to respect the local view south from Dartmouth Park Hill at the eastern end of the site. Good designs that avoid microclimatic, overshadowing and other impacts may allow a tall building to be located in the Triangle Site."*

6.29 In accordance with the Brief, the proposals incorporate variation in heights and massing across the site, particularly in relation to the treatment of York Way and the need to address and improve the street scene. It is also important, given the location of the site, to create a 'gateway to King's Cross Central' from the north, without creating a 'canyon' effect along York Way. The proposals therefore incorporate taller elements towards the northern part of the site. Shadowing studies have been undertaken to show that the proposals would not overshadow existing development or other areas of the site itself:

- The maximum heights proposed for Block B (fronting York Way) would allow for eight storeys of residential and
- The maximum heights proposed for Block A (parallel to the Thameslink tracks) would allow for 11 storeys of residential along York Way, rising to 17 storeys of residential at the north-east corner.

- 6.30 These building heights may not seem entirely consistent with Policy D9. That policy is clearly out of date given, for example, the new London Plan. The Joint Brief specifically mentions the possibility of a tall building on the Triangle Site (box following para 3.3.45).
- 6.31 Schedule 8 of the UDP identifies strategic and local views. No London-wide viewing corridors cross the Triangle Site. One local corridor (LV7, view from Dartmouth Park Hill to St Paul's Cathedral) crosses the north east corner of the Site, but as demonstrated in the Cultural Heritage and Townscape part of the ES, this viewline would not be affected by the proposals.

### Regent's Canal

- 6.32 The Regent's Canal is designated in the UDP as a site of Metropolitan Importance to which Policy Env 22 applies. In essence, this states that a high priority will be given to protecting and enhancing the nature conservation qualities of the site. The Borough importance of the habitat on the east side of the Triangle Site (Copenhagen Junction) and the south side of the North London Line is also included in Policy Env 22. The proposals have no adverse implications for this policy. Rather, the proposals would provide enhancement through the provision of a new habitat area within the north-east part of the Triangle Site.
- 6.32 The Regent's Canal is also identified as a Green Corridor to which Policy Env 25 relates. This points out that the Council will seek to maintain and improve this Green Corridor as a recreational and ecological resource. The wider KXC proposals accord with this policy (though they do not include Canal works or changes within Islington; all of the Canal works proposed are within Camden to the west of York Way).

## 7.0 KING'S CROSS OPPORTUNITY AREA PLANNING & DEVELOPMENT BRIEF, JANUARY 2004

- 7.1 A Planning and Development Brief ('the Brief') for the King's Cross Opportunity Area (KCOA) and Triangle Site was adopted as Supplementary Planning Guidance (SPG) by the London Borough of Camden in December 2003 and by London Borough of Islington in January 2004. Paragraph 1.1.2 of the Brief explains that it primarily covers the KCOA. It also provides guidance on the Triangle Site which falls partly within Islington and partly within Camden, hence the desire for a joint Brief.
- 7.2 The Brief provides site-specific advice to guide development and help the Councils implement policy and optimise the potential at King's Cross. The Brief is felt by the Councils to provide a stepping stone between the provisions of the development plans (in particular, adopted Chapter 13 of the Camden UDP, April 2003) and the requirements for major planning applications within the area.
- 7.3 Paragraph 1.3.4 of the Brief explains that it replaces the adopted Camden Community Planning Brief (1994) and sits alongside other SPG such as the revised King's Cross Conservation Area Statement (December 2003) and the Regent's Canal Conservation Area Statement (January 2001). It also replaces the draft Brief for the Islington Triangle (1996). It will, therefore, be a material consideration in determining any application within the Area and the Triangle.
- 7.4 This section is in four parts reflecting the chapter headings used in the Brief. The way in which the proposals respond to the topics covered broadly reflects their order in the Brief, but with some amalgamation to avoid duplication.

### Introduction

- 7.5 Paragraph 1.1.3 of the Brief emphasises that:
- "The two Councils wish to see major development and regeneration started, and completed, as soon as possible, to overcome the problems and uncertainties that have blighted the site in the recent past."
- 7.6 Accordingly, paragraph 1.3.3 of the Brief acknowledges the need to reconcile the aims of the Brief for the KCOA with the requirement for flexibility given the scale and complexity of the site and the very extended period over which development is likely to take place. The same paragraph goes on to recognise that the site presents complex challenges and it cannot meet an unlimited number of aspirations and objectives.
- 7.7 The applicants are grateful for this recognition of the need for flexibility, given the significant risks involved in major developments including the complexity of the engineering and construction process, and financing and letting risks within highly volatile markets. Nevertheless they have sought to indicate the likely programme of development and common infrastructure works, and the future procurement and planning process, in their Implementation Strategy submitted in support of both outline planning applications.

## Objectives for Development

- 7.8 Paragraph 1.4.2 of the Brief states that to achieve the best possible future for King's Cross, "the approach must be ambitious". The overall aim for King's Cross is to make it stronger, healthier, safer, more economically successful and very sustainable with excellent services. In particular the Councils' main objective will be to create firm links between the development and the local area so that it is a relevant and positive addition to, and well integrated with, this part of London (para 1.4.3). This integration includes improving physical, economic and social links, a phased approach, and working with the community.
- 7.9 The current proposals are very much in accordance with this main objective. The proposals present a very sustainable, high density mixed use development on a previously developed site which has the best public transport accessibility in London. As demonstrated when addressing the Camden UDP policies (and, in particular Policy SKC3) in Section 4.0 of this Statement, a key component in the proposals is an emphasis on high quality public realm and open spaces with a network of new streets, pedestrian and cycle linkages helping to reintegrate the site with the surrounding local community and its transportation networks. Initiatives that the applicants propose to take to spread the benefits of the development into surrounding communities are set out in the Regeneration Strategy.
- 7.10 The Brief contains specific reference to community safety in paras 1.4.4 – 1.4.7. It emphasises that improving community safety is a high priority for both Councils (as well as Government). Community safety was also identified as a major priority for local people in the extensive consultation exercises carried out by the applicants (para 3.6 of this Statement). The KXC proposals have been designed to make the new urban quarter a safe and welcoming environment for residents, businesses and visitors and the applicants are keen to explore options for improving community safety and management of the environment jointly with the the Local Authorities and Metropolitan Police, as explained in the Public Realm Strategy.

## Community Involvement

- 7.11 The Brief emphasises the Councils' commitment to consultation. The applicants share this commitment to community involvement and have been pro-active in putting consultation at the centre of the KXC proposals; they take seriously both the process of consultation and its findings. As well as maintaining a close liaison with the LPAs, the applicants have assisted local people to become involved in helping to shape proposals for the development. For example, the applicants have talked with, and presented to, over 4,000 people since 2001, including representatives of over 150 community, business and other organisations. This extensive, deep and successful consultation exercise with a wide range of stakeholders in the planning process is described in Section 3.0 of this Statement, and paras 4.52-4.60.
- 7.12 The KXC proposals are supported by a Statement of Community Engagement and full details of the extensive process of consultation and community involvement are contained in this document.

## Sustainable, Vibrant and Inclusive Development

### Scale and Mix

- 7.13 The Brief states that the KXC development by its location and scale represents an opportunity to make a very significant contribution to London. Paragraph 2.1.4 goes on to list a range of activities appropriate to Central London to promote the unique and diverse nature of the City including government, learning, cultural, retail, tourist, leisure and entertainment functions. The Brief expects KXC "... to strengthen the role, character and diversity of central London" (para 2.1.6) in accordance with the objectives of the draft London Plan (now the London Plan) clearly placing King's Cross in the central London context.
- 7.14 As demonstrated in Section 4.0 of this Statement (chiefly in addressing Policies SKC2 and KC1), the current proposals take full advantage of this opportunity by proposing a dense, vibrant, mixed use urban quarter which is well integrated with its locality and the local communities who live there. It is a very sustainable form of development as it represents the rejuvenation and revitalisation of a previously developed site which has the best public transport accessibility in London, with further transport infrastructure improvements taking place and planned.

### Density

- 7.16 The prime location of King's Cross within central London is a key policy consideration when considering the issue of density of development on the site. As explained in Section 8.0 of this Statement, Government guidance in RPG3 targets Central Area margins (such as King's Cross) for economic development with the highest densities closest to transport termini and seeks to maximise plot ratios within the Central Activities Zone which includes King's Cross and the surrounding area. The London Plan (see Section 9.0 below) states that commercial developments should achieve plot ratios of at least 3:1 wherever there is, or will be, good public transport accessibility and capacity; and that ratios nearer 5:1 can be achieved in highly accessible areas within Central London and some Opportunity Areas. The Examination in Public (EiP) Panel Report considered that plot ratio is a tool needing further development but that in any event the density of development should be maximised in Opportunity Areas.
- 7.17 Paragraph 2.2.2 of the Brief states that, in the broadest terms, a target plot ratio of 3:1 would indicate a scale of development across the 24 hectare (240,000 sq m) developable land within the KCOA of 720,000 sq m of development, taking no other considerations into account. The current proposals seek permission for a wide mix of land uses up to a maximum of 718,275 sq m on the Main Site and up to 24,000 sq m on the Triangle Site. The maximum amount of floor space for which permission is sought (i.e. approximately 743,000 sq m) represents a plot ratio of approximately 3:1 across the site area. Taking into account factors such as the physical characteristics of the site, the location of the canal, the retained heritage buildings and other sensitive areas, the Strategic View Corridors, transport provision, etc, the current proposals clearly accord with the Brief.
- 7.18 Paragraph 2.2.4 of the Brief states that commercial development on the site of, for example, 400,000 sq m could provide around 20,000 employment opportunities. The current proposals for the Main Site include up to a maximum of 486,280sq.m of business and employment floorspace. As highlighted at para 4.31 of this Statement, the socio-economic part of the ES and the Regeneration Strategy conclude that KXC could deliver around 30,000 new jobs, of which up to 40% might be taken by local people within a defined central impact zone and wider impact zone, with the right employment brokerage and training measures in place.

- 7.19 Paragraph 2.2.4 of the Brief considers it would be desirable and appropriate to provide at least 1,800 homes within the KXC site. The application for the Main Site seeks permission for up to 176,875 sq m of residential floorspace and the application for the Triangle Site seeks permission for up to 18,000 sq m, as part of the comprehensive mixed use development. This maximum floorspace figure could provide in the region of 2,550 new units. There would also be a minimum residential component. At the completion of the development on the Main Site, the total residential floorspace would not be less than 125,000 sq m and the total number of residential units would not be less than 1,600. Together with new homes on the Triangle Site (up to 250 units), the proposals would accord with this element of the Brief and potentially deliver even higher levels of new provision.
- 7.20 The current proposals also include a wide range of other retail, leisure, entertainment, cultural, community uses and other services and facilities. The retail floorspace proposed addresses the needs of the new resident, working and visiting population and gaps in provision for surrounding communities, in accordance with the Brief. The submitted Retail Impact Assessment demonstrates that the proposals would not threaten the vitality and viability of nearby centres.

### Form of Development

- 7.21 The current proposals accord with the aspirations of the Brief regarding the form of development. The current pattern and size of some blocks within the King's Cross area creates barriers to movement and gives rise to concerns of community safety. Accordingly, the current proposals seek to establish a variety of areas each with its own character and sense of place within a framework of high quality public realm, improved connectivity and permeability across the site and to the surrounding area. An Urban Design Statement, Urban Design Guidelines and Public Realm Strategy have been submitted in support of the proposals and explain the principles that have been followed in greater detail. However, many of the issues relating to the form of development have already been addressed in Section 4.0 of this Statement (for example, in relation to Policies SKC2 and SKC4).

### Transport

- 7.22 The proposals properly seek to maximise the opportunity for a high density, mixed use development scheme on a site which has the best public transport accessibility in London. The transport strategy for KXC is founded on the basis of a high degree of accessibility by public transport. As described in the Main Site Development Specification and shown on Parameter Plan KXC 007 (Access and Circulation for the Main Site), the proposals include a network of new and improved roads and pedestrian and cycle routes across the site, linking with the surrounding area. In particular, an emphasis is placed on improving north-south and east-west movement. The proposals have been designed to help encourage the free flow of people and include new paving, lighting, street furniture, signage, improvements to the towpath and new links over the Regent's Canal.
- 7.23 Paragraph 2.3.7 of the Brief points out developers should demonstrate that their proposals would not lead to any unacceptable impacts on the public transport and highway networks. The scale of the mixed use regeneration proposals for KXC are such that travel demands will be significant. However, as demonstrated in Sections 4.0 and 5.0 of this Statement in relation to Policies KC5, KC6 and T2, and in the submitted Transport Assessment, King's Cross represents an ideal location for such development and the proposals would not lead to any unacceptable impacts on public transport and highway networks.

- 7.24 Paragraph 2.3.9 of the Brief states that Transport Assessments should include or be accompanied by a Travel Plan. The submitted Transport Assessment is accompanied by a Travel Plan, with imaginative measures to promote sustainable travel patterns.

### Public transport

- 7.25 Paragraph 2.3.12 of the Brief highlights that the Councils will expect developers to address how their proposals can help bring about local improvements to transport infrastructure and services, keeping distances between modes to a practical minimum. This has been carried out by the applicants and the analysis is contained in the submitted Transport Assessment. The proposals would enhance scope to provide additional capacity on busy bus corridors and provide new and amended bus routes, e.g. to Barnsbury/Dalston. The proposals could also accommodate the proposed Cross River Tram (CRT) on an alignment based on Goods Way and York Way. The proposals are fully compatible with a new western concourse extension to King's Cross station should Network Rail be in a position to pursue this in the future.

### Car Parking

- 7.26 The Brief states that the Councils expect to see provision for car parking at very low levels, reflecting the unique accessibility of most of the site, and the advantages of high density mixed use in reducing the length and number of trips overall. The KXC proposals would comply with this aim. As explained in Section 4.0 of this Statement in relation to Policy KC7, the development would restrict car parking to minimum levels necessary. The car parking provision would be in accordance with the London Borough of Camden's adopted standards for the Main Site and the London Borough of Islington's adopted standards for the Triangle Site, and take into account Camden's Draft Replacement UDP. Notwithstanding the fact that the site is highly accessible, a minimum level of car parking is essential to the success of the scheme. The proposals include a multi-storey car park for a maximum of 800 spaces, which would help achieve the innovative shared use of parking between different land users, as explained further in connection with Policy KC7. The proposals should be seen in the context set out in the Main Site Development Specification (paras 2.016 – 2.019); and the fact that in 2001 the site could readily accommodate over 1,800 cars.
- 7.27 With regards to the Triangle Site, a maximum of 185 spaces would be provided as follows:
- Parking for the residential accommodation at an overall average ratio of 0.5/unit (ie. a maximum of 125 spaces)
  - A maximum of 60 spaces (the remainder) for the health and fitness facilities.
- 7.28 There would be no uncontrolled public parking within the Triangle Site, and no dedicated parking for the retail uses on completion of the development, although retail occupiers and their customers may have access to parking spaces at the earlier stages of development (when spaces would have been constructed at lower ground level but not yet taken up by residential occupiers).

### Economic Development and Training

- 7.29 In accordance with the objectives of the Brief for the regeneration of the area, the current proposals seek permission for a substantial amount of commercial floor space including business and employment, retail, leisure and recreation and hotel use which would provide a substantial number of new employment opportunities in the area.

- 7.30 It should be noted that, in order to reinforce London as a world city, take full advantage of the accessibility of the site and to secure the maximum number of new jobs, it is envisaged that the business and employment floor space proposed on the site would be predominately offices. It is considered that there may be parts of the Opportunity Area with the potential to accommodate some light industrial and/or some general industrial uses. However, the potential is limited and the Brief generally accepts this view (para 2.7.2), especially in view of the guidance in PPG13 and RPG3 which emphasises that commercial uses such as large offices should be located closest to major transport interchanges.
- 7.31 The KXC proposals offer significant potential to provide employment for local people which would help tackle high unemployment, lack of basic skills, low pay, deprivation and health issues. These matters are addressed within the socio-economic part of the ES and the Regeneration Strategy.

### Retail, Leisure, Entertainment and Related Commercial

- 7.32 These uses are recognised as being appropriate at King's Cross, as they are in the rest of central London, contributing to its vitality and viability, to its range of employment and business opportunities, and its regenerative potential (para 2.1.4). Suitable retail development is envisaged as encompassing a range of convenience, comparison, service and food and drink uses which address the needs of the new resident, working and visiting population, and also the gaps in provision for surrounding communities (para 2.2.4).
- 7.33 Paragraph 2.5.1 of the Brief acknowledges that existing retail provision within the area is relatively small scale and primarily serves the needs of workers and travellers and, in part, the local population. The same paragraph also recognises a local perception of a lack of local modern convenience shops.
- 7.34 The proposals for the Main Site seek permission for up to a maximum of 45,925 sq m of Class A1, A2 and A3 uses whilst the proposals for the Triangle Site seek permission for up to 2,500 sq m for these uses. However, the applicants propose not to construct more than 45,925 sq m across the two sites.
- 7.35 With regards to leisure use, the application for the Main Site seeks permission for up to 31,550 sq m of Class D2, and the application for the Triangle Site seeks permission for up to 3,500 sq m of Class D1/D2.
- 7.36 As addressed in connection with Policy RE4 and draft Policy SD5 in Section 5.0 of this Statement, the King's Cross Opportunity Area is a very suitable location for travel intensive land uses (such as shopping and leisure). The Retail Impact Assessment demonstrates that the scale and mix of floorspace proposed would not cause unacceptable harm to the viability and vitality of surrounding centres in accordance with para 2.5.4.
- 7.37 The proposals also meet the Brief's requirement to address existing needs in the area. Accordingly they seek to provide additional convenience and comparison provision and extend consumer choice.
- 7.38 The retail proposals on the Triangle Site specifically respond to the Brief (box on page 76). The lack of outlook at lower levels is said to suggest that this is an appropriate location for retailing and/or public leisure. Retail and other uses would be incorporated at ground level to enliven the street frontage along the York Way and at prominent corners, as shown on Triangle Site Parameter Plan TS 005.



## Tourism and Cultural Facilities

- 7.39 Paragraphs 2.6.1 and 2.6.2 of the Brief state that the area's central London location, high accessibility and the proximity to two main train termini make it a location with potential for new hotel accommodation. The current proposals seek permission for up to a maximum of 47,225 sq.m for hotel/serviced apartments floor space. A component of the D1 floorspace sought on the Main Site could also be for cultural uses such as museums relevant to tourism.
- 7.40 As highlighted earlier in this Statement, the KXC proposals seek permission for up to 107,315 sq m Class D1/D2 floorspace on the Main Site and up to 3,500 sq m Class D1/D2 floorspace on the Triangle Site. This gives considerable scope to provide some of the types of facilities listed in para 2.12.3 of the Brief.

## Housing

- 7.41 Paragraph 2.9.5 reiterates paragraph 2.2.4 of the Brief which states that the provision of at least 1,800 new homes within the KCOA and the Triangle Site would be desirable and appropriate. The proposals clearly comply with this, as explained in para 7.19 above.
- 7.42 Whilst the application for the Main Site is in outline and does not seek approval, at this stage, for the detailed design or external appearance of any new buildings, it is anticipated that the proposals would provide a mixture of types, sizes and densities. As shown on Parameter Plan KXC 008 for the Main Site, residential use is proposed in Development Zones F (alongside the Regent's Canal), J (along York Way), N (within the linked triplet of gas holder guide frames), P, Q, R, S and T (as part of mixed use development).
- 7.43 Paragraph 2.9.1 of the Brief states that housing, including affordable housing, should be included in each major phase of the development. Paragraph 5.35 of the submitted Implementation Strategy confirms that the intention is that each major phase of development should contain a mix of different uses, including market and affordable/low cost housing. The Implementation Strategy (para 5.15) also indicates that residential development (including at least 150 market units) may be provided at the northern end of the Transit Sheds within Development Zone R of the Main Site as part of the First Major Phase.
- 7.44 Accordingly, the housing proposals accord with, and to some extent exceed the aspirations of, the Brief.

## Health, Education and Children's Services

- 7.45 Paragraph 2.11.1 of the Brief highlights that the introduction of new residents and a new child population will require additional provision of services. Paragraph 2.11.5 emphasises that close partnership working on funding and delivery will be essential. The KXC proposals would provide up to 75,765 sq m of community and other uses on the Main Site and up to 3,500 sq m on the Triangle Site. Some of the types of facilities that could be included have already been listed in para 4.42 above. Thresholds for the phased delivery of community, health and educational uses would be agreed with the LPA following grant of planning permission.
- 7.46 The impact of the KXC proposals on health provision have been assessed as part of the submitted Environmental Impact Assessment. The ES concludes (Section 13.7) that:

*"The new population of up to 5,125 people would require up to three GPs on the basis of the national average, or up to four GPs on the basis of the aspirational target of one GP per 1,500*

people. To put this in context, recent experience of new primary care facilities in London suggests that a facility of 1,000 sqm could accommodate a four GP practice together with other ancillary services.

Thus, the proposed development could readily accommodate new provision, with the floorspace applied for, to meet the needs arising from the development. Any new provision could be on the Triangle Site and/or the Main Site.

The accommodation and provision of new facilities to meet the new demands arising from the development would counteract the 'moderate adverse' effect identified above and produce some benefits for the neighbouring population. Indeed, any new/enhanced facility is likely to reduce the current level of undersupply for existing residents.

The development would bring other positive effects on health service provision. Firstly, the additional connectivity through the site linking two currently divided communities allows for efficiencies in existing service provision through consolidation and rationalisation. Secondly, the regeneration activities in the area are likely to improve conditions (such as safety, housing etc) that would attract and help with retention of staff – this is currently a major issue within the area, where vacancy rates for health professionals are well above the England averages.”

## Open Space

- 7.47 Paragraph 2.13.5 identifies the two key priorities as being, firstly, adequate provision across the site for children, residents, the working population and visitors. The second priority is for a range of high quality “civic” spaces designed within a public realm and open space strategy.
- 7.48 The KXC proposals meet these two key priorities. The proposals are accompanied by a Public Realm Strategy that addresses the matters raised by the Brief in detail. As addressed in Section 4.0 of this Statement in relation to Policy KC10, a core component of the current proposals is a high quality public realm incorporating many new high quality open spaces. The proposals would provide safe and accessible open space, not only for outdoor recreation and play but also to create venues for public events and a focus for the community. Landscape Proposals Plans have been submitted for each of the principal spaces within the Main Site and these plans form part of the application.

## The Built Environment

### A Masterplan Approach

- 7.49 Paragraph 3.2.1 of the Brief recognises the need for flexibility in the development and assessment of proposals taking account of the likely extended development period. However, it also seeks a comprehensive approach to the whole site to ensure development achieves its full regenerative potential. Paragraphs 3.2.2 and 3.2.3 make reference to a comprehensive masterplan for the Area and the Triangle Site. The applicants have not submitted any document called “a masterplan”. However, the KXC proposals are embodied within a series of Parameters Plans and these provide a high quality ‘masterplan’ in the terms sought by the Councils. In addition the intended design approach is explained in numerous detailed supporting documentation (such as an Urban Design Strategy, Urban Design Guidelines and a Public Realm Strategy). Together the Parameter Plans and the supporting documents address the Councils’ desire for a masterplan approach.
- 7.50 For example, the proposals:

- Retain existing elements of character and important buildings, landmarks and infrastructure wherever possible;
  - Overcome existing problems by establishing a structure and layout to deliver a high quality public realm and improved connectivity and permeability within the site and with the surrounding area. This includes improved south – north linkages from Euston Road across the Regent’s Canal to the Granary complex and beyond and new and improved east – west connections; and
  - Provide for a new varied and vibrant urban form and grain which is safe and clean and which includes a range of building heights, volumes and shapes.
- 7.51 The one principal ‘gap’ between the proposals and the Brief is in relation to a reference to a route connecting the CTRL canal bridge area (towpath) to Randell’s Road (Bingfield Park). East – west connections are described as “likely to include” such a route in para 3.2.3. The applicants submitted representations to the draft Brief in October 2003 explaining why they did not consider this to be appropriate or desirable.
- 7.52 In respect of Figure 3 in the Brief, a clear distinction should be made between those connections diagrammatically shown which have a primary purpose within the masterplan and define its structural organisation and physical form (e.g. the north - south route from the Euston Road, over Goods Way and the canal and then through the Goods Yard to York Way north), and those connections which would have a secondary purpose, such as, in the applicants’ view, any route connecting the CTRL canal bridge area (towpath) to Randell’s Road (Bingfield Park). Connections with a secondary purpose may instead, for instance, be promoted through the placement of landmark buildings or structures to create a “legible and varied street pattern”.
- 7.53 The main routes between the CTRL canal bridge and Randell’s Road in the applicants’ proposals would be through the gas holders’ area or between the Coal Drops, and then northwards through and across Long Park (Parameter Plan KXC 004). An alternative route north of the Goods Yard would be along Goods Street East and York Street or one of the secondary routes through Development Zone R (Parameter Plans KXC 005 and 007).
- 7.54 The applicants support the notion that the masterplan should facilitate movement across the site, to connect with the canal corridor, which links with Camden to the west and with Islington to the east. Indeed, the basic orientation of the proposed layout, ‘fanning out’ to meet the Canal, promotes movement across the site as well as reflecting the historic alignment of the Goods Yard. However, the applicants fail to see a compelling case for a diagonal route, as suggested on the diagram in the Brief. Ultimately, this is not a primary desire line and the canal towpath has a finite pedestrian and cycle capacity. The applicants also do not see the CTRL canal bridge is, in any way, a “destination”, unlike, for example, the re-erection of the gas holder guide frames on the site of the Western Goods Shed which would provide a natural focal point and draw people down to the canal, through the “legible and varied street pattern” that is proposed. In this way, the Brief’s objective would be met and accommodated.

## Key Spaces

- 7.55 Paragraph 3.2.4 of the Brief emphasises that the enhancement of existing and the creation of new open spaces will make an important contribution to the creation of a new sense of ‘place’. As already explained, the proposals seek to achieve this with a high quality public realm framework including spaces of varying size, form and function. The key spaces, as shown on Parameter Plan KXC 004, include South Square and Station Square as southern gateways to the development; a new civic space in front of the Granary complex which would help define its setting and its relationship to the canal and attract people to the diverse activities of the central

heritage area of the development (Granary Square) and Long Park to the north. The Landscape Proposals Plans show the landscape components for each of these spaces and the accompanying network of routes including the Boulevard.

## Heritage

- 7.56 The heritage environment is an important and valuable asset which has been retained and enhanced in the current proposals as far as possible. As explained in relation to Policy KC11, the extensive masterplanning and consultation process leading to the current applications has found that many historic buildings, structures and surfaces are capable of being used in exciting ways that will generate new life. However, others are felt to constrain the structure of new routes and public spaces that are fundamental to the foundations for a new development framework. The Brief acknowledges such constraints in relation to particular buildings and structures, and the applicants' proposals are matched against these in the commentary on the Brief's six sub areas below.
- 7.57 The seven supporting statements to the applicants' listed building and Conservation Area consent applications set out a detailed justification for their selective demolition proposals against the criteria in PPG 15 and the adopted Camden UDP Chapter 13 policies.

## Views

- 7.58 Paragraph 3.2.11 of the Brief states that two Strategic Viewing Corridors cross the site from Kenwood House to St Paul's Cathedral and from Parliament Hill to St Paul's Cathedral. Parameter Plan KXC 014 fixes the maximum heights of new buildings within each part of the Main Site, as described in earlier sections. No new buildings, plant or other built development would exceed the maximum building heights given on the Parameter Plan.
- 7.59 With regards to local views, paragraph 3.2.12 of the Brief acknowledges that few have an extended history (having been created by the CTRL works), and that all views within the area will change to some degree due to ongoing and proposed developments. The Brief identifies a number of local views that it would be desirable to retain divided into 'main views' and 'secondary views'. A detailed analysis of the implications of the proposals is given in the Cultural Heritage and Townscape specialist report forming part of the EIA. Its overall conclusion is that while some local views of landmarks would be lost, others would be created. The overall appearance of the site would be improved and greater public access would create more opportunities to appreciate views of the heritage buildings and their settings.

## Building Scale and Design

- 7.60 Paragraph 3.2.17 of the Brief states that all buildings should be of high architectural quality, using high quality materials and sets out a number of requirements for their design. Whilst the two outline planning applications do not seek approval, at this stage, for the detailed design or external appearance of any new building, the proposals accord with the Brief. The proposals are accompanied by an Urban Design Statement and Urban Design Guidelines and these deal comprehensively with issues of building scale and design.

## Sub Area Design Guidelines

- 7.61 Paragraph 3.3.1 of the Brief states that, in addition to the overall Masterplan, more detailed design guidelines should be prepared and a number of sub areas are identified which it considers are appropriate sub-divisions based on the existing site characteristics and the proposed development principles.
- 7.62 This exercise has already been carried out by the applicants and the results are submitted in the Urban Design Guidelines. The sub-division of the site used in the Urban Design Guidelines (and the Urban Design Statement) understandably relates to the new framework of routes and spaces proposed by the applicants.
- 7.63 Further details of the overall design approach are given in the Urban Design Strategy, Urban Design Guidelines, and the Public Realm Strategy. A detailed analysis of how the proposed urban design strategy responds to the sub-area guidance in the Brief is given in Appendix 8. The design response to the Triangle Site, which forms part of sub-area 5 in the Brief is described in the Triangle Site Explanatory Statement.
- 7.64 The following section summarises how the applicants' proposals, including those for the various heritage buildings, relate to the guidance within the brief for each of its six sub areas.

### Sub Area 1 – The land between the stations and connecting to Euston Road

- 7.65 The current proposals comply with the requirements of the Brief in that:
- They create strong visual and pedestrian connections from Euston Road northwards into the KXC site.
  - They create a high quality new public realm creating a strong sense of arrival and departure around the interchange and the Great Northern Hotel.
  - The Great Northern Hotel is proposed to be retained and restored although later additions are proposed to be removed, thereby improving the character of the main building (as acknowledged in the Brief, para 3.3.6). The full justification for this proposal, including the benefits in terms of creating appropriate circulation space between the two stations and LUL access points is given in the Great Northern Hotel Listed Building Consent Supporting Statement.

### Sub Area 2 – South of the Canal

- 7.66 This area corresponds generally with Development Zones A, B, D, E and F on Parameter Plan KXC 005 relating to the Main Site.
- 7.67 The current development proposals accord with the Brief as they propose a strong and broad boulevard with appropriate building heights on either side to provide a scale appropriate to its vital role as the main visual and movement route leading people from the station area to the canal bridge and beyond.
- The German Gym and the Stanley Building South are proposed to be refurbished and re-used as part of the development proposals.
  - Listed Building consent is sought for the demolition of Stanley Building North. This is principally to enable Pancras Road to be aligned back to the frontage of St. Pancras Station (as anticipated in the Brief, para 2.3.43), with improved visual and pedestrian connections through the new Pancras Square to the canal and beyond. The results of the

re-evaluation of the current alignment of Pancras Road required by the Brief (paras 2.3.43 and 3.3.12) is given in the Stanley Building North Supporting Statement.

- Conservation Area consent is sought for the demolition of the Culross Buildings as they currently stand across the most appropriate alignment of the key south to north route, (as acknowledged in the Brief, para 3.3.11) and a secondary route through Pancras Square. The full justification for this proposal is given in the Culross Buildings Supporting Statement.
- High density and mixed use development is proposed in this sub area. The uses are likely to be predominantly for business and employment.
- The gas governor is proposed to be relocated immediately north of Goods Way but to the south of Regent's Canal. The Brief acknowledges the possibilities of relocating this facility in para 3.3.9.
- Gas holder no.8 is proposed to be dismantled, relocated and then the guide frame re-erected north of the canal within Development Zone N.
- Conservation Area consent is sought for the selective demolition of parts of the canal wall to extend the Boulevard route over the Canal into Granary Square (see below). A full justification for this and other works is given in the Other Non-Listed Buildings and Structures Conservation Area Consent Supporting Statement.

### Sub Area 3 – The Canal and Granary area

7.68 This sub area broadly equates to Development Zones K and L and the adjoining development zones on Parameter Plan KXC 005 relating to the Main Site.

7.69 The current proposals are in line with the Brief. For instance:

- The Granary is a focal point of the area reflecting its robust Victorian industrial architecture. The large area in front of the Granary is proposed for a new square providing a focus for the mixed A1, A2, A3, D1 and D2 uses which are proposed as the predominant ground floor land uses in this sub area.
- The proposals recognise that the canal has many different roles as an ecological habitat and corridor, a movement link, a break in the urban fabric and a heritage area. In particular, the proposals include the refurbishment and improvement of the canal towpath to improve pedestrian links and identify new pedestrian links across the Canal as part of the important south to north axis and also to improve connectivity to Camley Street Natural Park.
- Conservation Area consent is sought for the demolition of the Western Goods Shed to make way for the re-erection of the triplet of gas holder guide frames, with gas holder no.8 alongside (as anticipated in the Brief, para 3.3.13 and page 52). A full justification of the reasons for selecting this site and of the resulting benefits in making full use of this canal-side part of the site are given in the Gas Holder No.8/Western Goods Shed Supporting Statement.
- Conservation Area consent is sought for the demolition of the Plimsoll Viaduct to create access to and through the Western and Eastern Coal Drops in order to bring these buildings into beneficial re-use (as anticipated in the Brief, para 3.3.26). A full justification is included in the Plimsoll Viaduct Conservation Area Consent Supporting Statement.
- Listed Building consent is sought for the partial demolition of the northernmost bay of both the West Handyside Canopy and the East Handyside Canopy to allow the creation of a new east-west road from an efficient junction on York Way and a high-quality urban design at the northern end of the Goods Yard complex. The importance of this new route connecting directly with Copenhagen Street is inferred in the Brief at para 3.2.3,

and on pages 56 and 67. A full justification is included in the Handyside Canopies Listed Building Consent Supporting Statement.

- Conservation area consent is sought for the demolition of some unlisted structures in order to facilitate increased connectivity and permeability across the area, to deliver a world class public realm, and to help create a new 'sense of place' for the retained and reused buildings.

#### Sub Area 4 – Towards the CTRL Embankment

- 7.70 This broadly corresponds with Development Zones P, S, T, U, R and Q. The predominant land uses proposed are Class A1, A2, A3, B1, D1, D2 and residential. The primary access and circulation routes proposed would converge towards the centre of this sub area which provides the potential for a new central public space well framed by buildings, termed Long Park. The proposals are for a mixture of land uses at the ground floor and along the street frontages with a strong residential component and business and employment uses above. A MSCP is proposed alongside the CTRL embankment at its western end.

#### Sub Area 5 – York Way and The Triangle

- 7.71 The proposals for the Triangle Site are set out in para 6.7 above. The submitted Triangle Explanatory Statement (TES) contains a detailed account of how the proposals respond to all relevant aspects of the Brief in terms of the scale and form of development, access arrangements and sustainability.

#### Sub Area 6 – North of the CTRL Embankment

- 7.72 This area lies outside the KXC application areas, and includes the linear land. The applicants intend to bring forward a scheme for the linear land shortly, following the completion of ongoing feasibility studies.

### Sustainable Design

- 7.73 Section 3.4 of the Brief states that the Councils expect development proposals to promote sustainable design principles and explains some of the technical options and choices involved. The integration of sustainability concepts into the development proposals has already been addressed in Section 4.0 in connection with Policy SKC1. Further details of the applicants' approach to addressing sustainable design principles is set out in the submitted Environmental Sustainability Strategy.
- 7.74 Section 3.4 of the Brief sets out what the Councils consider to be the principal areas of importance and opportunities for biodiversity. These have been addressed fully in the submitted ES, Part 14 (Section 14.8).

### Implementation

- 7.75 Part 4 of the Brief sets out the form in which applications should be submitted within the KXOA. The applicants have carefully followed this guidance in terms of submitting:
- separate planning applications for the Main Site and the Triangle Site, and a series of parallel listed building and conservation area consent applications (in accordance with the Brief, para 4.1.4);

- an ES giving the findings of a robust EIA based on the Development Specifications including Parameter Plans for the Main Site and Triangle Site (in accordance with para 4.1.7 and 4.1.11);
  - a separate Retail Impact Assessment, a separate Transport Assessment and a Townscape and Heritage Assessment as part of the ES (in accordance with para 4.1.13);
  - a Planning Statement - this document, an Urban Design Statement and a Community Engagement Report (in accordance with para 4.1.14);
  - Urban Design Guidelines, Initial Conservation Plans, a Public Realm Strategy, an Implementation Strategy, a Green Travel Plan, a Code of Construction Practice, an Environmental Sustainability Strategy, and a Regeneration Strategy (in accordance with para 4.1.15).
- 7.76 The only supporting document mentioned in the Brief para 4.1.14 that has not been separately provided is a specific Accessibility Statement. This is because accessibility issues have been addressed as integral part of the design process; not as a discrete topic. An accessibility statement therefore forms part of the submitted Public Realm Strategy (sections 3.3 and 3.5 in particular) and the Green Travel Plan (section 9 in particular).
- 7.77 Suggested conditions that might be attached to subsequent planning permissions and listed building/conservation area consents have been included in the Supporting Statements to the various Heritage (Listed Building Consent and Conservation Area Consent) applications (in accordance with the Brief, para 4.1.16).
- 7.78 Parts 4 also provides guidance on the submission of applications for King's Cross Station, St Pancras Chambers and the Cross River Tram, all of which are out with the KXC applications.



## 8.0 RPG3: STRATEGIC GUIDANCE FOR LONDON PLANNING AUTHORITIES, MAY 1996

- 8.1 RPG3 – Strategic Guidance for London Planning Authorities was published in May 1996. The London Plan, adopted in February 2004, supersedes RPG3 but it is addressed in this Statement as it provides important historic policy context to the evolution of proposals for the King’s Cross Opportunity Area (KCOA). RPG3 is the basis for much of adopted UDP policy for both Camden and Islington.

### Central Area Margins

- 8.2 RPG3 acknowledged the importance of the Central Area continuing to cater for London’s world city role including giving business and commerce access to the latest developments in building technology and quality. A key to being able to achieve this without damaging the distinctive character of the Central Area was to make use of development opportunities in the so-called Central Area Margins (para 2.3).
- 8.3 King’s Cross was identified as one of five ‘Central Area Margin’ major development opportunities on Map 2 (the two opportunity areas south of the River are combined in para 2.37). These areas were identified as containing large areas of vacant and under utilised land, representing central London’s major opportunities for new development and growth. Major international termini were identified as being particularly significant, including King’s Cross/St Pancras.
- 8.4 As well as development opportunities, it was also recognised that the Central Area Margins contained areas of significant deprivation. Hence emphasis was placed on the need for the Margins to consolidate their existing economic strengths and develop new economic roles.
- 8.5 Major development sites were intended to do help to rebuild the local urban structure, define a new image for their areas, and bring benefits to their local communities. This message is reinforced in para 2.11 which stated that:

*“Development and regeneration should be encouraged through targeted action in impoverished and run down areas. The existing economic strengths and major development opportunities present, particularly in East London and the Central Area Margins, need to be realised in ways which will provide durable new employment opportunities that can diversify both their local economies and the economy of London as a whole. These opportunities need to be made accessible to those living and working in neighbouring areas, so that the local labour force, local suppliers and supporting enterprises, including small businesses, can benefit from the growth.”*

- 8.6 Paragraph 2.12, under the heading of “Focal Points of Regeneration” advised that:

*“London’s corridors and the Central Area Margins provide the key strategic opportunities in the capital to provide more competitive locations for business, to attract and nurture new economic sectors, to secure the development of vacant and underused land and to bring forward new investment opportunities. Investment in strategic road and rail infrastructure is consolidating the regeneration and development potential of these areas...”*  
(Our underlining)

- 8.7 The applicants have responded to this guidance by bringing forward a scheme which would extend Central Area functions north of the Euston Road, increasing the range of modern commercial premises on offer to national and international businesses. The scheme would act as

a regeneration catalyst in the local area. Potential initiatives to help optimise and spread the benefits to surrounding communities are discussed in the Regeneration Strategy.

### Development Pattern within the Site

- 8.8 As stated above, the rail termini were seen as particularly significant to redevelopment. Paragraph 2.36 provided further information regarding the relationship between the termini at King's Cross and the redevelopment of the site. It highlighted that:

*"Major development opportunities will arise in areas near to the international transport interchanges of King's Cross ... All should accommodate proposals for a mixture of land uses. The highest densities and most commercial uses should be closest to the termini. These may include large offices, drawing on the high accessibility to regional and international networks, subject to there being a reasonable prospect of demand..."*

- 8.9 In accordance with the guidance in RPG3, high density and significant office floorspace is proposed to be located to the south of Regent's Canal, closest to the railway station termini. The structure of routes and spaces put forward by the applicants provides a template for commercial development which would be attractive to a wide range of occupiers. In this way the proposals would maximise the chance of this site acting "as a magnet for inward investment" in line with RPG 3, para 2.33.

- 8.10 Paragraph 2.37 identified King's Cross as being of particular metropolitan significance. It stated:

*"Proposals should be brought forward for a new quarter of London with a distinctive identity enhancing features of historic and conservation importance. There will be scope for development for business, tourism and leisure, including areas of high density uses. It will be appropriate to provide housing and community facilities and measures to enhance access to employment which benefit neighbouring local communities."*

- 8.11 It is significant that in characterising the development potential of this site, business, tourism and leisure uses were mentioned first, given the site's high accessibility. The applicants have responded to this by ensuring that there is sufficient critical mass of business floorspace in their proposals to form an enterprise cluster, as described in the Implementation Strategy, section 3. The proposal to create a mixed use destination in and around the Goods Yard complex making maximum use of the heritage resources of the site, is also a response to this guidance.

- 8.12 The applicants' proposals also contain a large element of housing (up to 2,550 units) and scope for many community uses. Although uses would be mixed throughout the site, much of the residential component and community facilities would be north of the canal. This is consistent with para 2.36 which said:

*"...Away from the sites of highest accessibility, clear attempts should be made to promote uses which support and regenerate local communities, providing both residential and associated uses and community facilities serving the needs of both new development and established neighbouring areas."*

- 8.13 Paragraph 6.4 of the RPG urged London boroughs to identify locations and allocate sites for development which would be consistent with generating less total travel, promoting the use of public transport and other non-car modes, creating greater opportunities for activity based on forms of transport other than the car and reducing the journey length of those trips which are made by car. KXC embodies all of these principles, being adjacent to the extensive public

transport facilities offered at King's Cross/St Pancras, as discussed earlier in this Statement and in the Transport Assessment (in more detail).

- 8.10 In summary, the KXC proposals have been influenced by and comply with strategic guidance set out in RPG3 by seeking to take full advantage of the identification of King's Cross as a 'Central Area Margin' major development opportunity and creating proposals for a high quality, dense, mixed use development incorporating business and employment, residential, leisure, health, tourism, education and community uses.



## 9.0 THE LONDON PLAN, FEBRUARY 2004

- 9.1 The London Plan (the Plan) is the first Spatial Development Strategy and sets out the Mayor's vision for the capital up until 2016. The document is an integrated plan covering social, economic and environmental matters; it is not just a land use plan and is ambitious in its aims and objectives. When the Planning and Compulsory Purchase Bill becomes enacted (anticipated shortly with a commencement date later in Summer 2004). The London Plan will become part of the development plan. When adopted in February 2004, it replaced the existing RPG3 for London. In assessing the proposals against relevant policies in this section, page references are given for any quotes from the Plan, given its length.
- 9.2 The Plan is based on six over-riding objectives to which all policies relate:
- *"To accommodate London's growth within its boundaries without encroaching on open spaces.*
  - *To make London a better city for people to live in.*
  - *To make London a more prosperous city with strong and diverse economic growth.*
  - *To promote social inclusion and tackle deprivation and discrimination.*
  - *To improve London's accessibility.*
  - *To make London a more attractive, well-designed and green city".*
- 9.3 To do this the Plan promotes high density, mixed use sustainable development at transport nodes on previously used land. The proposal at KXC is clearly exemplary in this respect.

## Opportunity Areas

- 9.4 King's Cross is identified as an 'Opportunity Area' on the Key Diagram, Map 5B.1 (page 227) and on Map 2A.1 (page 226). Opportunity Areas are defined as areas capable of accommodating substantial new jobs or homes and their potential should be maximised. Opportunity Areas generally include major brownfield sites with capacity for new development and places with potential for significant increases in density. Their development should be geared to the use of public transport and they are either located at areas of good access or would require public transport improvements to support development (para 2.8).
- 9.5 Policy 2A.2 Opportunity Areas (page 39) states:
- "As part of the process of producing Sub Regional Development Frameworks, the Mayor will work with strategic partners to prepare planning frameworks for Opportunity Areas as shown in Map 2A.1, or to build on frameworks already developed. These frameworks will set out a sustainable development programme for each Opportunity Area, to be reflected in UDPs, so as to contribute to the overall strategy of the London Plan to:*
- *seek to exceed the minimum guidelines for housing and to have regards to the indicative estimates for employment set out in the sub-regional tables*
  - *maximise access by public transport*
  - *promote social inclusion and relate development to any nearby Areas for Regeneration."*
- 9.6 The specific priorities for the central London sub-region are set out in Policy 5B.1 (page 227). This sets out the priorities as to:

- *“Promote and protect the vital mix of culture, Government, leisure and commerce together with its historic buildings, housing, open spaces and public realm that are central London’s unique attraction for residents, visitors and business*
- *Sustain, enhance and promote the unique scale and mix of activities and settings of the Central Activities Zone which form the core of London’s wide offer as a world city and as a capital city*
- *Identify capacity to accommodate new job and housing opportunities and appropriate mixed-use development. This is especially important in relation to the Central Activities Zone, Opportunity Areas and Areas for Intensification, while recognising the overall strategic development priority to the east. It will include co-ordinating skills development, transport and planning to improve access to jobs for people from deprived communities in Central London and neighbouring parts of the other sub regions.”*

9.7 King’s Cross is also shown on Map 5B.2 (page 232) as a mixed use strategic Opportunity Area within the Central Activities Zone (CAZ). With regards to development in the CAZ, Policy 5B.2 (page 231) states:

*“Within the Central Activities Zone, boroughs should accommodate commercial development associated with business, tourism and retail....., subject to the protection of housing and identified special policy areas. Taking account of local amenity, land use mix and transport capacity, developments will be expected to maximise plot ratios. ....*

- 9.8 Policy 4B.3 Maximising the Potential of Sites (page 176) takes this one stage further by seeking to ensure that "development proposals achieve the highest possible intensity of uses" compatible with the local context, design principles and public transport capacity. Average site densities of the least 3:1 should be achieved with good public transport, and in highly accessible areas within central London and some Opportunity Areas, ratios nearer to 5:1 can be achieved (para 4.4).
- 9.9 The KXC proposals are in line with Policy 4B.3. The reasons why the applicants' proposals would achieve an average plot ratio of about 3:1, and not more, are set out in Section 4.0 of this Statement in relation to Policy SKC2.
- 9.10 Policy 4B.3 seeks residential densities within the ranges set out in its Table 4B.1 (reproduced as Appendix 6 in this Statement). For sites with the highest accessibility index and a central setting, this suggests a density of 650-1,100 habitable rooms/ha. The applicants' proposals, based on Sustainable Residential Quality principles, seek to achieve this, with an emphasis on high quality flatted development with limited car parking.
- 9.11 Policy 5B.4 Opportunity Areas in central London (page 233) identifies through Table 5B.1 the minimum targets for homes and jobs within each area.
- 9.12 With respect to King’s Cross, Table 5B.1 sets out the following minimum targets for homes and jobs:

Opportunity Areas	Area (hectares)	New Jobs to 2016	New Homes to 2016
King’s Cross	53	11,400	1,250

- 9.13 The applicants submitted representations to the draft London Plan EiP in March 2003 stating that these targets underplay the potential of the King's Cross Opportunity Area. At paragraph 3.15 of the EiP Panel report, it concluded that the Mayor should review the tables in the light of the representations put forward and the discussion at the EiP. Furthermore, the Panel recommended that the site areas, "new homes" and "new jobs" figures should be clearly stated in all cases to be indicative estimates and that the aim should be to achieve higher figures, particularly for additional homes, whenever practicable in the Sub Regional Development Frameworks (SRDFs). The approach adopted by the Mayor has been not to amend any targets within the Plan, accepting that they under-estimate potential, and to review them as part of the SRDF process.
- 9.14 The SRDFs are to be published in draft by the end of 2004 and will inform the first review of the Plan (revised draft expected end 2005). Notwithstanding this, the KXC proposals would significantly exceed both the targets for new jobs and new homes.
- 9.15 Paragraph 5.37 (page 236) is of particular relevance and interest as it specifically addresses the King's Cross Opportunity Area. It states:
- "King's Cross has the best public transport accessibility in London. This will improve further with the completion of the Channel Tunnel Rail Link (CTRL), Thameslink 2000 and the Cross River Transit. Construction of the CTRL will release 20 hectares of under used land. Its central location and unique public transport accessibility offer particular scope for high-density business development, as well as housing. Conference facilities could be appropriate provided they could be integrated satisfactorily with other activities. In such a highly urbanised quarter, environmental quality is crucial. The development framework should draw upon the historic features of the site to create a truly sustainable business and residential community, reliant on minimal use of cars."*
- 9.16 In accordance with this aim, the current proposals seek permission for a sustainable, dense, high quality, mixed use scheme including up to a maximum of 486,280 sq m business and employment floorspace and up to 2,550 units within a framework of a 'world class' public realm and maximising the heritage resources of the site.

## Sustainability

- 9.17 Policy 2A.1 Sustainability Criteria (page 38) sets out the following:

*"The Mayor will use the following criteria in developing the Sub Regional Development Frameworks (see Chapter 5) and when considering UDPs and planning applications referred to him:*

- *Optimising the use of previously developed land and vacant or under-used buildings*
- *Using a design-led approach to optimise the potential of sites*
- *Ensuring that development occurs in locations that are currently, or planned to be, accessible by public transport, walking and cycling*
- *Ensuring that development occurs in locations that are accessible to town centres, employment, housing, shops and services*
- *Ensuring that development takes account of the capacity of existing or planned infrastructure including public transport, utilities and community infrastructure, such as schools and hospitals*
- *Taking account of the physical constraints on the development of land, including for example, flood risk, ensuring that no significant harmful impacts occur, or that such impacts are acceptably mitigated*

- *Taking account of the impact that development will have on London's natural resources, environmental and cultural assets and the health of local people*
- *Taking account of the objectives of preventing major accidents and limiting their consequences*
- *Taking account of the suitability of sites for mixed use development and the contribution that development might make to strengthening local communities....."*

9.18 The KXC proposals would fully comply with the sustainability criteria set out in Policy 2A.1 for the reasons discussed in connection with Camden's Policy SKC1 in Section 4.0 of this Statement. The Environmental Sustainability Statement sets out the applicants' response to issues such as waste and water management and renewable energy, which are the subject of more detailed policies in the Plan, such as 4A.8 and 4A.9.

### Mixed Use Development

9.19 The Plan has at its heart the development of London's role as a world city, particularly in the context of the Central Area, and the realisation of major opportunity areas such as King's Cross, while meeting the needs of diverse communities. King's Cross is included in the Central Activities Zone which is defined as "the core location for international business and finance and as a national transport node" (para 5.25).

9.20 Policy 3B.3 Office Provision (page 90) states:

*"The Mayor will and boroughs should seek to rejuvenate office based opportunities in CAZ and in strategically specified locations in view of their contribution to the London economy and their role in rejuvenating the suburban town centres".*

9.21 Policy 3B.4 Mixed Use Development (page 90) goes on to say:

*"Within CAZ and the Opportunity Areas, wherever increases in office floorspace are proposed, they should provide for a mix of uses including housing, unless such a mix would demonstrably conflict with other policies in this Plan. SRDFs will give further guidance on the relevant proportions of housing and other uses to be sought."*

9.22 The KXC proposals would comply with Policies 3B.3 and 3B.4. As explained in relation to Camden's Policies SKC2, KC1, and RE5 (in Sections 4.0 and 5.0), and in relation to Islington's Policies ST18 and Imp5 in Section 6.0, the outline planning applications include a broad mix of land uses, including business and employment and residential floorspace.

9.23 The Plan promotes a polycentric strategy for London's development by promoting the strategic importance of London's town centres (Policy 2A.5). Further guidance is given in Policy 3D.2. A more detailed discussion of the policy context is given in the Retail Impact Assessment section 2, which is reproduced as Appendix 7 of this Statement.

9.24 The applicants' Retail Impact Assessment demonstrates that the scale and type of retail, food and drink and leisure provision proposed as part of a comprehensive mixed use development at KXC would extend choice, meet local needs and would not threaten the vitality and viability of neighbouring centres.



## Transport and Development

9.25 One of the over-riding objectives of the Plan is to secure a closer integration of transport and spatial development. In order to help achieve this objective, Policy 3C.1 Integrating Transport and Development (page 103) states:

*“The Mayor will work with TfL, the Strategic Rail Authority, the Government, boroughs and other partners to ensure the integration of transport and development by:*

- *Encouraging patterns and forms of development that reduce the need to travel especially by car*
- *Seeking to improve public transport capacity and accessibility where it is needed, for areas of greatest demand and areas designated for development and regeneration, including the Thames Gateway, CAZ, Opportunities Areas, Areas for Intensification and town centres*
- *In general, supporting high trip generating development only at locations with both high levels of public transport accessibility and capacity, sufficient to meet the transport requirements of the development. Parking provision should reflect levels of public transport accessibility.”*

9.26 In a consideration of this policy, the EiP Panel report stated that the strategy should give greater weight to the national policy of reducing the need to travel (para 4 of PPG13). The Panel felt that this could be achieved by greater emphasis on enabling people to work closer to where they live (Panel report para 5.5).

9.27 The KXC proposals accord with Policy 3C.1. They comprise a comprehensive, mixed use development on a site which is acknowledged to have the best public transport accessibility in London. They would therefore help bring all activities within closer reach enabling people to work closer to where they live and vice versa thereby reducing the overall need to travel.

9.28 Policy 3C.2 Matching development to transport capacity (page 104) says:

*“The Mayor will and Boroughs should consider proposals for development in terms of existing transport capacity, both at a corridor and local level. Where existing transport capacity is not sufficient to allow for travel generated by proposed developments, and no firm plans exist for a sufficient increase in capacity to cater for this, Boroughs should ensure that development proposals are appropriately phased until it is known these requirements can be met...”.*

9.29 The applicants' and EiP Panel's concerns about the risks of too literal an interpretation of this policy are given in Section 5.0 in connection with Camden's draft Policy T2. Nevertheless the proposals do not conflict with Policy 3C.2 as the Transport Assessment demonstrates that the trips associated with KXC could be accommodated on the various rail networks, even if there were no other improvements than those already committed (CTRL and PPP enhancements to LUL).

9.30 Furthermore, the TA takes no account of the many additional initiatives set out in the submitted Green Travel Plan, to further promote sustainable travel choices and minimise reliance of the private car. See paras 4.45 and 4.46 in Section 4 above.

## Design and Strategic Views

- 9.31 The Plan points out that good design is central to all the objectives contained in the Plan. Policy 4B.1 Design Principles for a Compact City (page 173) is designed to help achieve this objective. It states:

*“The Mayor will, and boroughs should, seek to ensure that developments:*

- *Maximise the potential of sites;*
- *Create or enhance the public realm;*
- *Provide or enhance a mix of uses;*
- *Are accessible, useable and permeable for all users;*
- *Are sustainable, durable and adaptable;*
- *Are safe for occupants and passers by;*
- *Respect local context and communities;*
- *Are practical and legible*
- *Are attractive to look at and , where appropriate, inspire, excite and delight;*
- *Respect the natural environment; and*
- *Respect London’s built heritage.*

*These principles should be used in assessing planning applications and in drawing up area planning frameworks and UDP policies. Urban Design Statements showing how they have been incorporated should be submitted with proposals to illustrate their design impacts.”*

- 9.32 The KXC proposals for the site exemplify all of the requirements set out in this strategic policy. The central importance and application of urban design within the applicants’ proposals are explained in connection with Policies SKC2 and D4 (Sections 4.0 and 6.0 of this Statement respectively).

- 9.33 Policy 4B.4 Enhancing the Quality of the Public Realm (page 179) states:

*“The Mayor will work with strategic partners to develop a coherent and strategic approach to the public realm. Boroughs should develop local objectives and implementation programmes for their public realm. In doing so, they should involve stakeholders, including their local communities.*

*The Mayor will, and Boroughs should, work to ensure the public realm is accessible, usable for all, meets the requirements of Policies 3A.14 and 4B.5, and that facilities such as public toilets are provided. Planning applications will be assessed in terms of their contribution to the enhancement of the public realm.”*

- 9.34 The proposals fully comply with strategic Policy 4B.4. The proposals have emerged from extensive engagement with a wide range of stakeholders in the planning process. A key feature of the outcome of the consultation and community engagement exercises was the support for a new and enhanced public realm.

- 9.35 Policy 4B.5 Creating an Inclusive Environment (page 178) states:

*“The Mayor will require all future development to meet the highest standards of accessibility and inclusion.*

UDP policies should integrate and adopt the following principles of inclusive design that will require that developments:

- Can be used easily by as many people as possible without undue effort, separation or special treatment;
- Offer the freedom to choose and the ability to participate equally in the development's main stream activities; and
- Value diversity and difference.

*Boroughs should require development proposals to include an Access Statement showing how the principles of inclusive design, including the specific needs of disabled people, have been integrated into the proposed development and how inclusion will be maintained and managed.*

*These principles and the requirements of Policy 3A.14 should be adopted by all responsible for changing or managing the built environment."*

9.36 The proposals comply with this strategic objective. A key feature of the proposals is to improve accessibility, permeability and connectivity within the site itself, but also to help integrate with the surrounding neighbourhoods and communities. The range of new roads, cycle routes and pedestrian links for the Main Site are shown on Parameter Plans KXC004 and KXC007 and on Parameter Plans TS004, TS005 and TS006 for the Triangle Site. The strategy for improving accessibility generally is described in the submitted Transport Assessment supporting the proposals and within the Regeneration Strategy. See also para 7.76 above on accessibility issues.

9.37 Policy 4B.6 Sustainable Design and Construction (page 179) points out:

*"The Mayor will, and boroughs should, expect future developments to meet the highest standards of sustainable design and construction.*

*These will include measures to:*

- *Re-use land and buildings;*
- *Conserve energy, materials, water and other resources;*
- *Ensure designs make the most of natural systems both within and around the building;*
- *Reduce the impacts of noise, pollution, flooding and micro-climatic effects;*
- *Ensure developments are comfortable and secure for users;*
- *Conserve and enhance the natural environment, particularly in relation to biodiversity; and*
- *Promote sustainable waste behaviour in new and existing developments, including support for local integrated recycling schemes, Combined Heat and Power (CHP) schemes and other treatment options (subject to Policy 4A.1 and 4A.2).*

*Applications for strategic developments should include a statement showing how sustainability principles will be met in terms of demolition, construction and long-term management.*

*Boroughs should ensure that where appropriate, the same sustainability principles are used to assess planning applications."*

9.38 The proposals have emerged following careful consideration of sustainable design principles. Further details are provided under SKC1 in Section 4.0 above and within the submitted Environmental Statement and Environmental Sustainability Strategy. A Code of Construction Practice seeks to ensure sustainability and minimum impact in the construction process. See also Appendix 5.

9.39 Policy 4B.9 Large Scale Buildings – Design and Impact (page 182) seeks that:

*“All large-scale buildings including tall buildings should be of the highest quality design and in particular:*

- *Meet the requirements of the View Protection Framework set out in Policy 4B.15 of this Plan;*
- *Be suited to their wider context in terms of proportion and composition and in terms of their relationship to other buildings, streets, public and private open spaces, the waterways or other townscape developments;*
- *Be attractive city elements as viewed from all angles and where appropriate contribute to an interesting skyline, consolidating clusters within that skyline or providing key foci within views;*
- *Illustrate exemplary standards of sustainable construction and resource management and potential for renewable energy generation and recycling;*
- *Be sensitive to their impact on microclimates in terms of wind, sun, reflection and over shadowing;*
- *Pay particular attention, in residential environments, to privacy, amenity and over shadowing;*
- *Be safe in terms of their own integrity and the safety of occupiers and have an acceptable relationship to aircraft, navigation and telecommunication networks.*
- *Be appropriate to the transport capacity of the area ensuring adequate, attractive, inclusive and safe pedestrian and public transport access;*
- *Provide high quality spaces, capitalise on opportunities to integrate green spaces and planting and support vibrant communities both around and within the building;*
- *Where appropriate contain a mix of uses with public access, such as ground floor retail or cafés;*
- *Relate positively to water spaces taking into account the particular needs and characteristics of such spaces”.*

9.40 Policy 4B.15 London View Protection Framework (page 185) states:

*“ The Mayor designates the selected set of strategically important views listed in Table 4B.2 to be managed in accordance with Policies 4B.16 and 4B.17. These policies will become operational when Strategic View directions are withdrawn (see below).*

*The Mayor will keep the list of designated views under review. Views will only be considered for designation where:*

- *The viewing place is open, publicly accessible and well used, a place in its own right allowing for pause and enjoyment of the view*
- *Significant parts of London, or significant buildings, would be visible*
- *The view is highly valued and allows for the appreciation and understanding of London as a whole, or of major elements within it, and does not replicate existing managed views without added benefit*

- *The view represents at least one of the following: a panorama across a substantial part of London, a broad prospect along the river or a view from an urban space, including urban parks, which may be a linear view to a defined object or group of objects, which offers a cohesive viewing experience.*

*Within designated views, the Mayor will identify strategically important landmarks where the landmark is easy to see and recognise, provides a geographical or cultural orientation point, and is aesthetically attractive. Preference will be given to landmarks that are publicly accessible. The landmark should be a natural focus within the view although it does not have to be the only one.*

*Boroughs should base designation and management of local views in their UDPs on Policies 4B.15-4B.17."*

- 9.41 The Strategic Views are to be kept under review. The existing view directions will remain in place until the new arrangements have been consulted upon and agreed.
- 9.42 Both applications seek outline planning permission and whilst approval is sought for siting, approval is not sought, at this stage, for the detailed design or external appearance of any new buildings. Nevertheless, the proposals respond positively to the above policy criteria, as appropriate at this stage. With regard to strategic views, the Main Site Parameter Plan KXC 014 fixes the maximum heights of new buildings within each part of the site and would ensure no new building, plant or other built development would exceed the development plane heights given. The Triangle Site Parameter Plans TS 006 and 007 give similar information although no strategic view corridor affects this site.

## Heritage

- 9.43 With regards to built heritage and views, Policy 4B.10 London's Built Heritage states:

*"The Mayor will work with strategic partners to protect and enhance London's historic environment.*

*UDP policies should seek to maintain and increase the contribution of the built heritage to London's environmental quality, to the economy, both through tourism and the beneficial use of historic assets, and to the well-being of London's people while allowing for London to accommodate growth in a sustainable manner."*

- 9.44 Policy 4B.11 Historic Conservation (page 183) states:

*"Boroughs should:*

- *Ensure the protection and enhancement of historic assets in London are based on an understanding of their special character, and form part of the wider design and urban improvement agenda, and that policies recognise the multi-cultural nature of heritage issues*
- *Identify areas, spaces and buildings of special quality or character and adopt policies for their protection and the identification of opportunities for their enhancement, taking into account the strategic London context*
- *Encourage and facilitate inclusive solutions to providing access for all, to and within the historic environment.*

- 9.45 Policy 4B.12 Historic Conservation-led Regeneration (page 183) states:

*“The Mayor will and boroughs should support schemes that make use of historic assets to stimulate environmental, economic and community regeneration where they:*

- *Bring redundant or under-used buildings and spaces into appropriate use;*
- *Secure the repair and re-use of Buildings at Risk*
- *Help to improve local economies and community cohesion;*
- *Fit in with wider regeneration objectives;*
- *Promote inclusiveness in their design.”*

9.46 The KXC proposals accord with these strategic policies. As explained in Section 4.0 of this Statement in the context of Policy SKC4 and Policy KC11, the proposals capitalise upon the diverse and unique character of the area and its distinct sense of place and seek to use heritage buildings and features as positive aspects, embedding them within the fabric of the new urban quarter. They are therefore a good example of conservation as an integral part of regeneration.

## Implementation

9.47 The Plan sets out requirements for a number of assessments to be submitted with major applications. The KXC applications' package responds to these requirements, e.g. the Socio Economic Report, which is a specialist report within the ES, addresses Policy 3A.25, and the Transport Assessments and Green Travel Plan address Policy 3C.2.

9.48 Policy 6A.4 Priorities in Planning Obligations (page 286) states that:

*“The Mayor will, and boroughs should, reflect the policies of this plan and include appropriate strategic as well as local needs in their policies for planning obligations. The Mayor wishes to develop with boroughs a voluntary system of pooling for the provision of facilities relating to proposed developments. Affordable housing and public transport improvements should generally be given the highest importance with priority also given to learning and skills and health facilities and services and childcare provisions.”*

9.49 As addressed in relation to Policy KC12 in Section 4.0 above, the KXC proposals have the potential to have a considerable positive impact on the physical, social and economic conditions experienced by the local communities. The proposals would bring new economic opportunities and inward investment. In this context, the applicants will discuss with the Councils conditions and/or obligations that may arise as a result of the development in accordance with the central Government guidance contained in Circular 1/97. Affordable housing, public transport, learning and skills, health facilities and childcare are addressed in detail in Section 4.0, under policies KC4, SKC1 and KC5.

9.50 Policy 6A.8 Phasing of development and transport provision (page 290) states that:

*“The Mayor will keep the supply of land, premises and transport under regular review to ensure that development proceeds in a well-phased and co-ordinated fashion. Boroughs should seek to manage development so that it is phased around the broad indicative targets in Table 6A.1.”*

9.51 The proposals at King's Cross are important in achieving the home and job targets for central London and given the unrivalled accessibility, the site is not reliant on major new transport infrastructure not already committed and underway. The submitted Implementation Strategy explains how the proposed development would be delivered in a well-phased and co-ordinated

fashion, retaining flexibility to respond to changes in market and other opportunities and other factors over time.

### Blue Ribbon Network

- 9.52 The Regent's Canal is shown on Map 4C.1 to be part of the Blue Ribbon Network (BRN) and is also included in the list at para 4.99 of the Plan. Accordingly, the BRN policies are addressed here.
- 9.53 The BRN policies replace RPG3b/9a Strategic Planning Guidance for the River Thames, but relate to all waterways including the Regent's Canal.
- 9.54 As explained under Policies SKC1, SKC4, KC1 and KC10 in Section 4.0, the Regent's Canal is an important heritage and environmental feature of KXC. It has become visually unattractive in parts and is a perceived and actual barrier impeding north-south movement across the site. The proposals for KXC would enhance the canal environment, capitalise on it as an asset for the wider area, provide new and refurbished access points, refurbish and resurface the towpath, and provide new bridges, lighting and signage. The applicants' proposals are shown on the Main Site Parameter Plan KXC 006 and the Landscape Proposals Plans.
- 9.55 The applicants' proposals therefore respond to many of the BRN policies, particularly its importance in the open space network (Policy 4C.4), its relationship with adjoining heritage buildings (Policy 4C.10), the importance of increasing access alongside and to it (Policy 4C.17), and seeking high-quality design for all waterside development (Policy 4C.20).
- 9.56 The Urban Design Statement and Urban Design Guidelines submitted by the applicants meet the requirements of Policies 4C.21 and 4C.28.





## 10.0 CENTRAL GOVERNMENT PLANNING GUIDANCE

- 10.1 Planning Policy Guidance notes (PPGs) set out the Government's policies for the national planning system and how it should operate. Much of their content guides local authorities in the process of preparing and reviewing their development plans. The parts that are intended to influence the general location of development or the determination of planning applications are clearly of more relevance here.
- 10.2 This section summarises the main ways in which the evolution of the KXC proposals have followed national guidance. Extensive cross-references are made to earlier sections of this Statement to avoid repetition. Only particularly relevant sections of PPGs are quoted here.
- 10.3 The 25 PPG notes are currently being updated into a more succinct series of Planning Policy Statements (PPSs) and reference is made to relevant consultation draft PPSs as appropriate.

### PPG1: General Policy and Principles, February 1997

- 10.4 Three themes underpin the Government's approach to the planning system, in particular, the principle of Sustainable Development.
- 10.5 Paragraph 5 states that a sustainable framework should:
- "
- *Use already developed areas in the most efficient way, while making them more attractive places in which to live and work;*
  - *Shape new development patterns in a way which minimises the need to travel.* "
- 10.6 Paragraph 7 highlights that urban regeneration and re-use of previously-developed land are important supporting objectives for creating a more sustainable pattern of development. The Government is committed to:
- "
- *Concentrating development for uses which generate a large number of trips in places well served by public transport, especially in town centres, rather than in out of centre locations; and*
  - *Preferring the development of land within urban areas, particularly on previously developed sites, provided that this creates or maintains a good living environment, before considering the development of greenfield sites.* "
- 10.7 Clearly, the proposed development would make efficient use of the former King's Cross railway lands and contribute towards the regeneration of the wider area. The proximity of the site to six underground services, mainline rail and local bus services makes it a highly accessible location ideally suited to serve the range of uses proposed as part of the development. The ways in which the proposals respond to the challenge of sustainable development are addressed in Section 4.0 of this Statement in connection with Policy SKC1 and in Appendix 5.
- 10.8 Paragraph 9 of PPG1 states that major mixed use developments which would attract a significant number of trips should be in locations which are well served by public transport, have adequate infrastructure and are properly integrated, in terms of land use and design, with surrounding areas.

10.9 Paragraph 12 acknowledges that the planning system can be used to deliver high quality mixed use developments, such as 'urban villages'. Built on large sites, usually within urban areas, they are characterised by:

"

- Compactness;
- A mixture of uses and dwelling types including affordable housing;
- A range of employment, leisure and community facilities;
- High standards of urban design;
- Access to public open space and green spaces;
- Ready access to public transport. "

10.10 The KXC proposals provide a sustainable framework within which to deliver a mixed use development including business and employment uses, residential accommodation, hotels, retail and leisure uses, community, culture and education facilities together with the associated areas of landscaping and open space. The development would create a vibrant and distinctive urban quarter facilitating regeneration across a wider area through physical, economic and social integration with nearby communities.

10.11 Further details of how the proposals would ensure the delivery of mixed uses are given in Section 4.0 in connection with Camden's Policies SKC2 and KC1, and in Section 6.0 in connection with Islington's Policies ST14 and Imp5.

10.12 The importance of good design is another key message of PPG1. Paragraph 13 of PPG1 emphasises the importance of the design of buildings and to urban design. It states that these are distinct, albeit closely interrelated subjects.

10.13 Paragraph 14 continues by saying that urban design should be taken to mean the relationship between different buildings; the relationship between buildings and the streets, squares, parks, waterways and other spaces which make up the public domain; the nature and quality of the public domain itself; the relationship of one part of a city with other parts; and the patterns of movement and activity which are thereby established. In short, the complex relationships between all the elements of the built and unbuilt space.

10.14 Paragraph 15 states that good design should be the aim of all those involved in the development process and should be encouraged everywhere.

10.15 Although the applications are made in outline, detailed consideration has been given to the layout and design of KXC in response to the consultation exercises, the characteristics of the site and surrounding area. The public realm framework provides the basis for the overall proposals. The way in which urban design principles underpin the applicants' whole approach and the application material that demonstrates this, is described in Section 4.0 in connection with Camden's Policy SKC4 and in Section 6.0 in connection with Islington's Policy D4.

## Consultation Paper on Planning Policy Statement 1: Creating Sustainable Communities

10.16 The Government issued draft PPS 1 in February 2004 for consultation which is intended to replace PPG1. The Government's commitment to creating sustainable communities and delivering sustainable development is the underlying theme throughout the draft guidance. This will play a key role when working towards the Governments objectives of achieving balanced housing markets and sustainable improvements in the economic performance of all English

regions. A positive, proactive approach to planning with a more simple, efficient and effective system is expected to deliver this.

- 10.17 The guidance sets out a number of objectives for planning to facilitate and promote sustainable patterns of urban and rural development which reflect those in PPG1. These are contained in paragraph 1.5 and include:

"

- *Making sustainable land available for development in line with economic, social and environmental objectives to improve the quality of life.*
- *Contributing to sustainable economic growth.*
- *Ensuring high quality development through good design.*
- *Ensuring that development supports existing communities and contributes to the creation of safe, sustainable and liveable communities with good access to jobs and key services".*

- 10.18 The draft statement also places considerable emphasis on the issue of community involvement as expanded in a separate paper on this topic entitled '*Community Involvement in Planning: The Government's Objectives*'. This highlights community involvement as central to the delivery of the *Government's Sustainable Communities Plan: Building for the Future, February 2003*.

- 10.19 Paragraph 2.5 states that '*Active participation in the development of options and proposals should be at the heart of the process. The community must be able to put forward and debate options and help mould proposals before they are settled. People need to feel that their participation can make a difference*'.

- 10.20 The applicants fully subscribe to these objectives. Their approach to sustainable development has been referred to above, and details of their extensive engagement with stakeholders since 2000 and the ways in which this has influenced the proposals are set out in Section 3.0, and in Section 4.0 in connection with Policy SKC1. In the field of public consultation the applicants have taken a proactive and leading role in advance of detailed Government guidance on this issue.

### PPG 3: Housing, March 2000

- 10.21 Amongst the Government's objectives set out in paragraph 2 are that local planning authorities should:

" ...

- *Provide wider housing opportunity and choice and a better mix in the size, type and location of housing than is currently available, and seek to create mixed communities;*
- ..."

- 10.22 The list of objectives also includes giving priority to re-using previously developed land in urban areas, creating more sustainable patterns of development, planning for mixed use, and promoting good design. The KXC proposals clearly accord with these objectives, as discussed above in relation to PPG1. There is also an objective to reduce car dependence in selected locations for new housing - the ways in which the proposals respond to this are discussed under PPG13 below.

- 10.23 In terms of creating mixed communities, the Development Specifications for KXC refer to a mix of dwelling sizes proposed including studio/one bed, two, three and four bed units. This is intended to encourage a mixed community in terms of household size whilst providing a

substantial number of smaller units to meet the tendency towards smaller households and optimise high density provision within this central London site.

- 10.24 In terms of delivering affordable housing paragraphs 15 - 17 state that decisions about the amount and types of affordable housing to be provided in individual proposals should reflect local housing need and individual site suitability and be a matter for agreement between the parties, within the context of local plan policy and Circular 6/98 "Planning and Affordable Housing".
- 10.25 KXC would provide at least 1,800 and up to 2,550 affordable housing units, i.e. higher than development plan requirements. A mix of market and affordable/low cost housing would be provided in each major phase to provide up to 2,550 units and no less than 1,600. Thresholds for the delivery of affordable/low cost housing would be agreed with the planning authorities once outline permission is granted.
- 10.26 In terms of making the best use of land, PPG3 introduced density guidance encouraging housing development of between 30 and 50 dwellings per hectare net and seeking greater intensity of development at places with good public transport accessibility (para 58). Proposals for KXC clearly accord with this guidance.

### Consultation Draft Changes to PPG3

- 10.27 In July 2003, the ODPM published for consultation proposed changes to PPG3 Paras 9-20, 71 and Annex B, and another to para 42. Much of this draft guidance is directed at local authorities in terms of assessing housing needs, defining affordable housing in the local area, and setting targets. In relation to development control the draft changes state that failure by applicants to comply with policy on affordable housing set out in the development plan could justify the refusal of planning permission (para 12). The ways in which the KXC proposals accord with Camden's adopted Policy KC4 and Islington's adopted Policy H16 are described in Sections 4.0 and 6.0 of this Statement.

### PPG4: Industrial and Commercial Development and Small Firms, November 1992

- 10.28 PPG4 seeks to encourage continued economic growth in accordance with the Government's environmental objectives.
- 10.29 In terms of locational factors, paragraph 10 states that development plans offer the opportunity to:
- "
- *Encourage new development in locations which minimise the length and number of trips, especially by motor vehicle;*
  - *Encourage new development in locations that can be served by more energy efficient modes of transport (this is particularly important in the case of offices, light industrial development, and campus style developments such as science and business parks likely to have large number of employees);*
  - *Discourage new development where it would be likely to add unacceptably to congestion."*
- 10.30 In terms of re-use of urban land, paragraph 21 of the PPG states that getting large amounts of underused or vacant urban land previously used for industrial purposes into beneficial use is important to the regeneration of towns and cities. Optimum use should be made of potential

sites and existing premises in inner cities and other urban areas, taking into account such factors as accessibility by public transport.

- 10.31 KXC presents the opportunity to achieve the comprehensive redevelopment of the vacant and under used land to the north of King's Cross and St Pancras stations to secure the long awaited regeneration of this area. The applicants' proposals include a B1 floor area of up to 486,280m<sup>2</sup> within the Main Site and this is intended to create an 'enterprise cluster' as discussed in connection with Policies SKC1 and KC3.

#### PPG 6: Town Centres and Retail Development, June 1996 and Draft PPS6: Planning for Town Centres

- 10.32 National retail planning policy is set out in PPG6 (June 1996) as clarified by the Ministerial statement of 10 April 2003 following case law. An update in the form of draft PPS6 was published in December 2003.
- 10.33 Overall national guidance advocates the plan-led approach. Because the KXC proposals brings forward a development plan allocation, the main issues which need to be addressed in PPG6 terms, at this stage, are the scale, mix and impact of the retail component. A full review of PPG6 and draft PPS6 and their application to KXC is given in Appendix 7, which reproduces the policy section of the Retail Impact Assessment.
- 10.34 As discussed in relation to Camden's adopted Policy SKC1 in Section 4.0 of this Statement, the Impact Assessment demonstrates that the retail and leisure components of the KXC proposals could be provided without adversely affecting the viability and vitality of surrounding centres.

#### PPG 13: Transport, March 2001

- 10.35 Paragraph 4 of the PPG states that the objectives are to integrate planning and transport at the national, regional, strategic and local level to:

"

- *Promote more sustainable transport choices for both people and for moving freight;*
- *Promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling and*
- *Reduce the need to travel, especially by car. "*

- 10.36 Paragraph 6 states in order to deliver the objectives of this guidance, when preparing development plans and considering planning applications, local authorities should:

"

- *Actively manage the pattern or urban growth to make the fullest use of public transport, and focus major generators of travel demand in city, town and district centres and near to major public transport interchanges;*
- *Locate day to day facilities which need to be near their clients in local centres so that they are accessible by walking and cycling;*
- *Accommodate housing principally within existing urban areas, planning for increased intensity of development for both housing and other uses at locations which are highly accessible by public transport, walking and cycling;*
- *Ensure that development comprising jobs, shopping, leisure and services offer a realistic choice of access by public transport, walking and cycling;*

- *Give priority to people over ease of traffic movement and plan to provide more road space to pedestrians, cyclists and public transport in town centres, local neighbourhoods and other areas with a mixture of land uses. "*

10.37 The earlier discussion of PPG 1 and 3 has already established KXC's credentials as a high-density mixed use scheme. This section focuses on ways in which the proposals would promote accessibility and reduce car dependence.

10.38 Paragraph 19, under the heading of accessibility, states that:

*'A key planning objective is to ensure that jobs, shopping, leisure facilities and services are accessible by public transport, walking and cycling. This is important for all, but especially for those who do not have regular use of a car, and to promote social inclusion. In preparing their development plans, local authorities should give particular emphasis to accessibility in identifying the preferred areas and sites where such land uses should be located, to ensure they will offer realistic, safe and easy access by a range of transport modes, and not exclusively by car'.*

10.39 Para 21 is a key section of PPG13 and identifies the concept of 'Key Sites'. The strategy of focusing travel-intensive uses at centres and major public transport interchanges, underpins the stated approach to key sites. These are defined as the most accessible sites, such as those in town centres and others that are, or will be, close to major transport interchanges. The PPG makes it clear that:

*"Local authorities should seek to make maximum use of the most accessible sites, such as those in town centres and others which are, or will be, close to major transport interchanges. These opportunities may be scarce. They should be pro-active in promoting intensive development in these areas and on such sites. They should develop a clear vision for development of these areas, prepare site briefs and, where appropriate, consider using compulsory purchase powers to bring development forward. Local authorities should review their development plan allocations and should:*

- *allocate or reallocate sites which are (or will be) highly accessible to public transport for travel intensive uses (including offices, retail, commercial leisure, hospitals and conference facilities), ensuring efficient use of land, but seek, where possible, a mix of uses, including a residential element; and*
- *allocate or reallocate sites unlikely to be well served by public transport, for uses which are not travel intensive".*

10.40 The KXC proposals make full use of this key site. They comprise dense, mixed land uses on a site which is acknowledged to have the best public transport accessibility in London. This would help bring all activities within closer reach enabling people to work closer to where they live and vice versa, thereby reducing the overall need to travel. An extensive network of pedestrian and cycle routes is built into the proposals linking into surrounding areas. These issues are addressed in Section 4.0 above in connection with Policies SKC1, SKC2, KC5, 6 and 9.

10.41 A Transport Assessment (and Green Travel Plan) has been submitted in support of the current proposals, in accordance with PPG13, para 23.

## PPG 15: Planning and the Historic Environment, September 1994

- 10.42 PPG15 (which is currently under review) advises that developers should assess the likely impact of their planning proposals on the special interest of historic sites and structures and the character and appearance of conservation areas, and provide such written information or drawings as may be required to understand their significance (paras 2.11, 2.12 and 4.15). This has been addressed through the EIA, with the findings reported in the Environmental Statement.
- 10.43 PPG15 indicates that the design of new buildings intended to stand alongside historic buildings needs very careful consideration:
- "In general it is better that old buildings are not set apart, but are 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"* (para 2.14).
- 10.44 The submitted Development Specifications incorporate parameters for each of the "fundamental architectural principles" referred to above, together with others identified within the Joint Planning and Development Brief, as discussed within the Cultural Heritage and Townscape part of the Environmental Statement, paras 9.2.1 to 9.2.16. The ES confirms that there is sufficient information to assess the likely effects of the scheme (para 9.2.16). Furthermore, the Urban Design Statement and other supporting documents explain how the historic buildings and structures have been 'embedded' within the new development.
- 10.45 A palette of material for the public realm areas is indicated on the Landscape Proposals Plans (Main Site Development Specification, Annex D). Materials (and other aspects of external appearance) in relation to buildings would be reserved for subsequent approval by the LPAs.
- 10.46 In terms of re-using heritage buildings, PPG15 states that:
- "New uses may often be the key to a building's or area's preservation, and controls over land use, density, plot ratio, daylighting and other planning matters should be exercised sympathetically where this would enable a historic building or area to be given a new lease of life"* (para 2.18).
- 10.47 The Main Site Development Specification, Annex E and the supporting Initial Conservation Plans, propose various works of alteration, to many buildings and structures to be retained within the new development, to facilitate their refurbishment for specified new uses, as part of the comprehensive site development.
- 10.48 PPG15 advises that it is generally preferable if related applications for planning permission and for listed building or conservation area consent are considered concurrently (para 2.12). The application package reflects this advice: the Main Site planning application is accompanied by parallel applications seeking listed building and conservation area consent for demolition and other works that are fundamental to delivering the site's comprehensive redevelopment.
- 10.49 The supporting statements for each of the applications for listed building and conservation area consent address directly PPG15 paras 3.4-3.5 and 3.17-3.19, which deal with the demolition of listed buildings and also unlisted buildings that make a positive contribution to designated conservation areas (para 4.27). Para 3.4 states:

*"Applicants...must be able to justify their proposals. They will need to show why works which would affect the character of a listed building are desirable or necessary. They should provide the local planning authority with full information to enable them to assess the likely impact of their proposals on the special architectural or historic interest of the building and on its setting."*

10.50 Para 3.17 in relation to listed buildings looks for:

*"...clear and convincing evidence that all reasonable efforts have been made to sustain existing uses or find viable new uses, and these efforts have failed; that preservation in some form of charitable or community ownership is not possible or suitable; or that redevelopment would produce substantial benefits for the community which would decisively outweigh the loss resulting from demolition..."*

- 10.51 The supporting statements address these paragraphs and provide a comprehensive level of information, evidence and justification, in particular about the substantial benefits that would flow from the proposals, to inform the judgments required by PPG15, para 3.17. The methodology used includes testing hypothetical retention options in comparison to the applicants' proposals against the criteria in PPG 15.
- 10.52 Para 4.27 expects proposals to demolish unlisted buildings that make a positive contribution to a conservation area to be assessed against the same criteria as for listed buildings. In less clear-cut cases - for instance, where a building makes little or no such contribution – PPG15 advises that the local planning authority will need to have "full information" about what is proposed for the site after demolition. Consent for demolition should not be given unless there are "acceptable and detailed plans for any redevelopment" (para 4.27). All but one of the conservation area consent supporting statements uses a similar methodology to justify demolitions as for a listed building. The exception covers miscellaneous unlisted structures, many of which are utilitarian or modern such as the petrol filling station.
- 10.53 The application package provides a very full level of information about positive interventions, selective demolitions and the wider regeneration scheme. The application package takes very full account of and is consistent with PPG15 in that it provides as much detail as possible and reasonable, bearing in mind the size of the site, its complexity, the timescale for development, the planning objectives and implementation requirements of the Joint Brief and other factors.

#### PPG17: Planning for Open Space, Sport and Recreation, July 2002

- 10.54 The introduction to this PPG states one of its main objectives is to promote more sustainable development by ensuring that open space, sports and recreational facilities (particularly in urban areas) are easily accessible by walking and cycling and that more heavily used or intensive sports and recreational facilities are planned for locations well served by public transport.
- 10.55 The KXC proposals comply with the guidance in PPG17. A core component of the framework for the proposals is a high quality public realm incorporating many new high quality open spaces. The framework provides safe and accessible open space. The proposals for both the Main Site and the Triangle Site include sport and recreation land uses which are easily accessible, particularly by walking and cycling and to public transport.



### PPG23: Planning and Pollution Control, 1994

- 10.56 This guidance note highlights that the principle of sustainable development means that, where practicable, brownfield sites, including those affected by contamination, should be recycled into new uses and the pressures thereby reduced for greenfield sites to be converted to urban, industrial or commercial uses. Such recycling can also provide an opportunity to deal with the threats posed by contamination to health or to the environment.
- 10.57 The issues involved in decontamination in respect of the former gasworks and railway uses are addressed fully in the Environmental Statement.

### PPG24: Planning and Noise, September 1994

- 10.58 This guidance note emphasises that much of the development that is necessary for the creation of jobs and the construction and improvement of essential infrastructure will generate noise. However it also states that the planning system should not place unjustifiable obstacles in the way of such development. Relevant issues are addressed in the Environmental Statement, Part 17.
- 10.59 In summary, the proposals embody many of the key themes of Government planning guidance. The cornerstone of its guidance is the need for development to be sustainable. The current proposals present a comprehensive, dense, mixed use development scheme on a previously developed urban site which has the best public transport accessibility in London. The proposals are set within a framework which establishes a high quality, public realm and improves accessibility, permeability and connectivity within the site itself and to surrounding neighbourhoods and communities.



## 11.0 SUMMARY AND CONCLUSIONS

### The Applications

- 11.1 The KXC proposals are submitted by the landowners (LCR and Exel plc) and their selected partner, Argent St George. The proposals are for a sustainable, high-density, mixed use development designed to shape a vibrant and distinctive new urban quarter for London and to facilitate wider regeneration.
- 11.2 The evolution of the proposals has both informed, and been informed by, the evolution of planning policy and guidance for the site. The KXC proposals represent the culmination of a process of researching, testing and refining the physical, social, economic and environmental framework that underpins the proposals. This has included extensive consultation exercises with a wide range of stakeholders in the planning process.
- 11.3 The applicants share the expressed desire of local authorities and local communities, to see major development and regeneration started, and completed, as soon as possible to overcome the problems and uncertainties that have blighted the KXC site in the recent past.
- 11.4 There are outline planning applications covering the two parts of the site; the Main Site in Camden and the Triangle Site in both Islington and Camden. Each of the two planning applications include a detailed Development Specification (which defines and describes the principal components of the developments applied for), including a series of Parameter Plans which address and fix various elements of the proposed development.
- 11.5 Four applications for listed building consent and four applications for conservation area consent have been submitted in parallel, and each of these has its own supporting statement.
- 11.6 This Statement has sought to signpost the reader to key parts within the extensive supporting documentation that accompanies these applications.
- 11.7 The proposals have been design-led by an outstanding team, and this, together with regular liaison with interested parties including in particular, the two Local Planning Authorities, the GLA, English Heritage and CABI Design Reviews, has helped to develop and test ideas, as they have emerged.

### Policy Compliance

- 11.8 The policy assessment in this Statement demonstrates that the applicants' proposals are consistent with all the strategic and local policies for the King's Cross Opportunity Area in adopted Chapter 13 of the Camden UDP. Some of the key conclusions from this assessment are that:
- The proposals meet the common sustainability and regeneration objectives of Central, London-wide and Local Government, whilst addressing aspirations and concerns raised by local people;
  - The proposals could deliver around 30,000 new jobs, of which up to 40% could be taken by local people within a defined 'central impact zone' and 'wider impact zone', with the right employment brokerage and training measures in place;
  - The proposals, as submitted, represent an appropriate, optimum development response to all of the relevant planning and design considerations;

- Together, the two applications provide for more than twice the net increase in housing units (1,000 minimum) sought under Policy KC4. The proposals provide for studio, one bed, two bed, three bed and four bed accommodation, including homes suitable for families;
  - The proposals would also help balance the tenure profile in the area by introducing a range of market, intermediate, key worker and other affordable/low-cost housing. In particular, it would provide the basis for a local “housing ladder” in which a choice of tenures and prices is available to local residents.
  - The proposed quantum of retail and leisure facilities would not threaten the viability and vitality of neighbouring centres;
  - The proposed development contributes positively to the “integrated package of improvements to the local transport arrangements” that is held to be the key to minimising car use;
  - The proposed car parking ratios comply with UDP standards and represent the minimum necessary for the development. Many homes would be ‘car free’;
  - The proposals represent a careful balance between the protection of heritage and other social and economic considerations to fulfil wider policy objectives.
- 11.9 The proposals are in accordance with the Camden UDP Chapter 13 policies including those on housing (KC4) and car parking/storage (KC7). Beneath these policies, however, there are two outstanding issues within the Camden UDP Chapter 13 explanatory text, fully explored at the UDP Inquiry. First the applicants remain concerned about what seems to be an inappropriate emphasis on family housing, notwithstanding that it is expressed as a Camden priority (para 13.49). The comprehensive nature of the housing proposals submitted in the applications represent in the view of the applicants ‘full consideration of the site’s housing potential’ (Brief, page 16) and the best use of scarce urban land.
- 11.10 Second, the applicants remain concerned about unrealistic expectations for the scale of car free housing (‘possibly up to about 75%’, explanatory text para 13.55). The applicants have responded to the Council’s desire to see car-free housing and are proposing a development with parking at low, minimum levels within which 50% or more of the units would be car-free.
- 11.11 Accordingly, the proposals accord with KC4 and KC7 i.e. the UDP policies to which the relevant paragraphs from the explanatory text relate.
- 11.12 Other borough-wide policies in the Camden UDP and Deposit Draft Replacement UDP are assessed in Section 5.0 of this Statement for completeness. Of particular importance is the fact that the development proposals respond strongly to the opportunities created by the identification of the King’s Cross Opportunity Area as either the, or one of the, most suitable location for travel-intensive development, business development and leisure development.
- 11.13 The assessment demonstrates that the KXC proposals broadly accord with other relevant policies, but in many cases the special considerations which should take precedence in the KCOA have already been spelt out in the adopted UDP Chapter 13 policies.
- 11.14 The proposals are assessed against relevant policies within the adopted Islington UDP in Section 6.0 of this Statement. This is relevant to the Islington part of the Triangle site, although given the implications of realigning York Way westwards and the need to take a coordinated approach to the two parts of the Triangle site, the most up-to-date guidance is included in the Joint Planning and Development Brief.
- 11.15 The applicants’ mixed use development proposals for the Triangle Site would assist delivery of the key policies in the Islington UDP including objectives for the three area-based designations

covering this location. The proposals accord with Policy D4, although in respect of proposed building heights they respond to guidance in the Joint Brief rather than the borough-wide Policy D9, which may be regarded as out of date.

- 11.16 The proposals are assessed against guidance within the KCOA Joint Planning and Development Brief in Section 7.0 of this Statement. The proposals respond very carefully to this guidance as it is so up-to-date (adopted in December 2003/January 2004). The applications accord with this guidance in terms of the vision for the site, the community engagement undertaken, the quantum and mix of development proposed, and the design principles incorporated. The only minor exception is that the applicants' proposals do not include a diagonal route as such between the CTRL canal bridge and Randell's Road (Bingfield Park), although alternative and more appropriate ways of accommodating this movement are of course incorporated.
- 11.17 The package of application material submitted faithfully reflects the requirements in part 4 of the Brief. Instead of providing a separate Accessibility Statement, such issues are addressed in the Public Realm Strategy and Green Travel Plan.
- 11.18 As demonstrated in Section 8.0 of this Statement, the proposals clearly accord with guidance in RPG3. They bring forward a high-quality mixed use scheme making full use of this important Major Development Opportunity Site on the Central Area Margins. The proposed pattern of development within the site responds to RPG3's guidance to locate high density development and most commercial uses closest to the rail termini.
- 11.19 The proposals are assessed against policies in the London Plan, which since its adoption in February 2004 has replaced RPG3. Many of these policies will be relevant to the Mayor's consideration of the KXC outline planning applications as a strategic referral. The proposals reflect the aspirations for the site as a central London Opportunity Area. In particular they accord with policy to maximise plot ratios and residential densities, given that King's Cross is the most accessible development opportunity in London. The scale and range of uses proposed would assist in enhancing London's world city role. The material submitted in support of the applications demonstrates how the proposals would meet criteria in The London Plan on sustainability, design, heritage and the Blue Ribbon Network.
- 11.20 As demonstrated in Section 10.0, the proposals embody many of the key themes of Government planning guidance. The cornerstone of its guidance is the need for development to be sustainable. To achieve this, the current proposals present a comprehensive, dense, mixed use development scheme on a previously developed urban site which has the best public transport accessibility in London (in accordance with PPGs 1, 3, 4 and 13). The proposals are set within a framework which establishes a high quality, public realm and improves accessibility, permeability and connectivity within the site itself and to surrounding neighbourhoods and communities (in accordance with PPGs 1, 13 and 17).
- 11.21 All assessment methodologies have reflected the requirements in the relevant topic-based PPG. Hence, the retail and leisure component meets relevant locational criteria and would not adversely impact on surrounding centres (in line with PPG6). Proposals for positive interventions into, and reuse of, heritage structures with some selective demolition have been comprehensively justified (in line with PPG15). Transport, contamination and noise impacts have been thoroughly assessed (in line with PPGs 13, 23 and 24).

## Subsequent Stages

- 11.22 This Statement has also highlighted various mechanisms for carrying forward the development proposals should outline planning permission be granted, including:
- Inviting a condition requiring all future applications for approval of reserved matters to conform strictly with the development parameters of the relevant Development Specification including its Parameter Plans;
  - agreeing thresholds with the LPA(s) for the phased delivery of a significant proportion of affordable/low-cost housing;
  - establishing clear mechanisms to agree issues such as the appropriate ownership and management arrangements for the various forms of affordable housing, probably in the form of planning obligations; and agreeing thresholds and mechanisms for the phased delivery of health, education and community facilities.
- 11.23 These matters are set out fully within the Development Specifications which define and describe the developments applied for and are formally part of each application. Moving forward, the applicants remain committed to the ongoing procurement of high quality design. For example, as each phase of buildings come forward for approval of reserved matters, the applicants would submit an Urban Design Analysis, to explain how the design of development forming part of the that major phase responds to the original Urban Design Guidelines. Each such application would also be accompanied by an illustrative build-out plan for the whole site to aid understanding by the LPA(s) and others. This is discussed further in the Main Site Development Specification Section 6 and the Implementation Strategy Section 7.
- 11.24 The KXC proposals meet the requirements of the King's Cross Opportunity Area policies, for a sustainable, high density, mixed use scheme providing employment and other opportunities in a strategic and borough wide context. The proposals provide a significant positive contribution towards the objectives of housing, leisure, townscape, design, heritage, regeneration, integration and transportation policies.

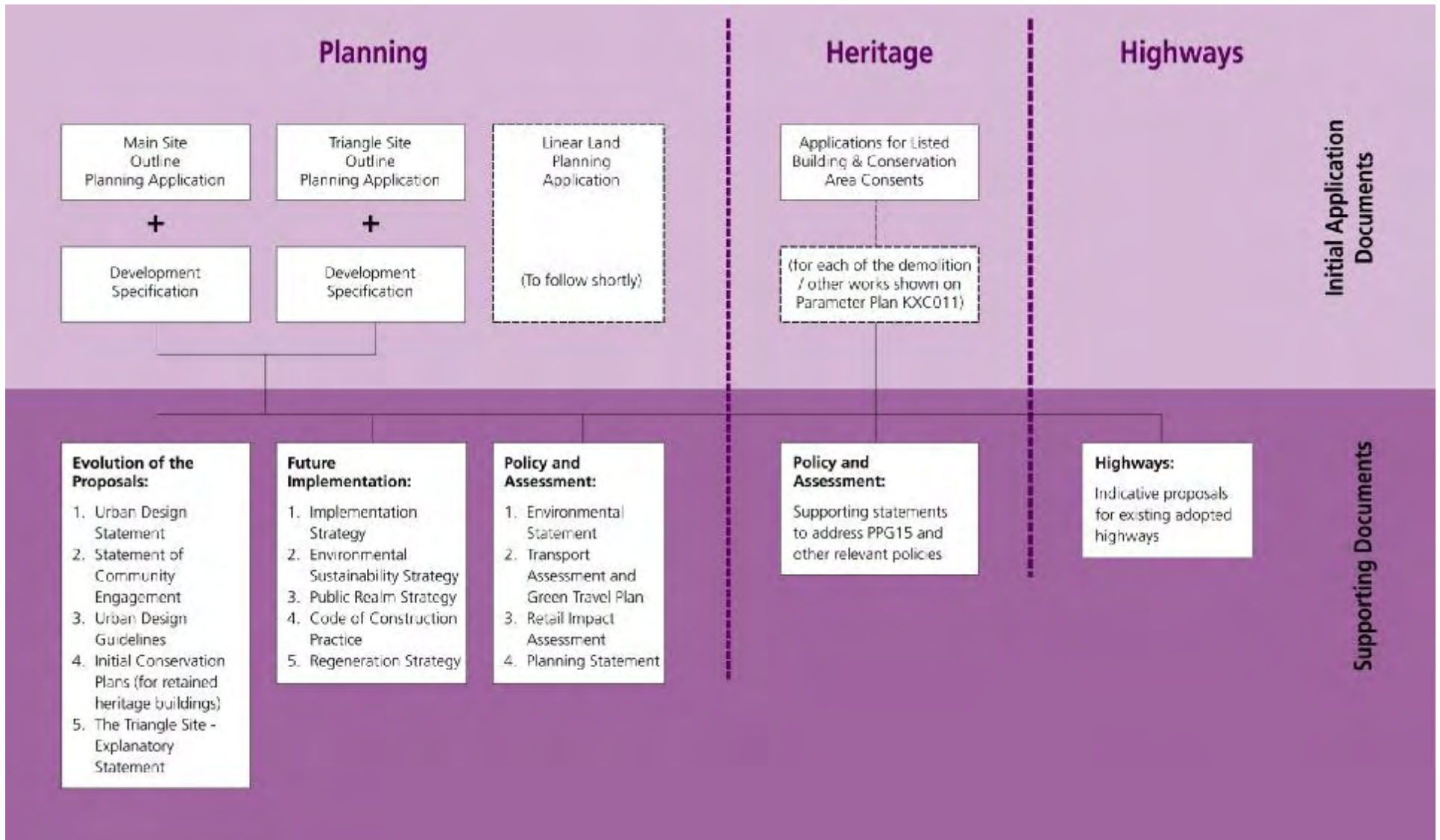
# Appendices





**Appendix 1**

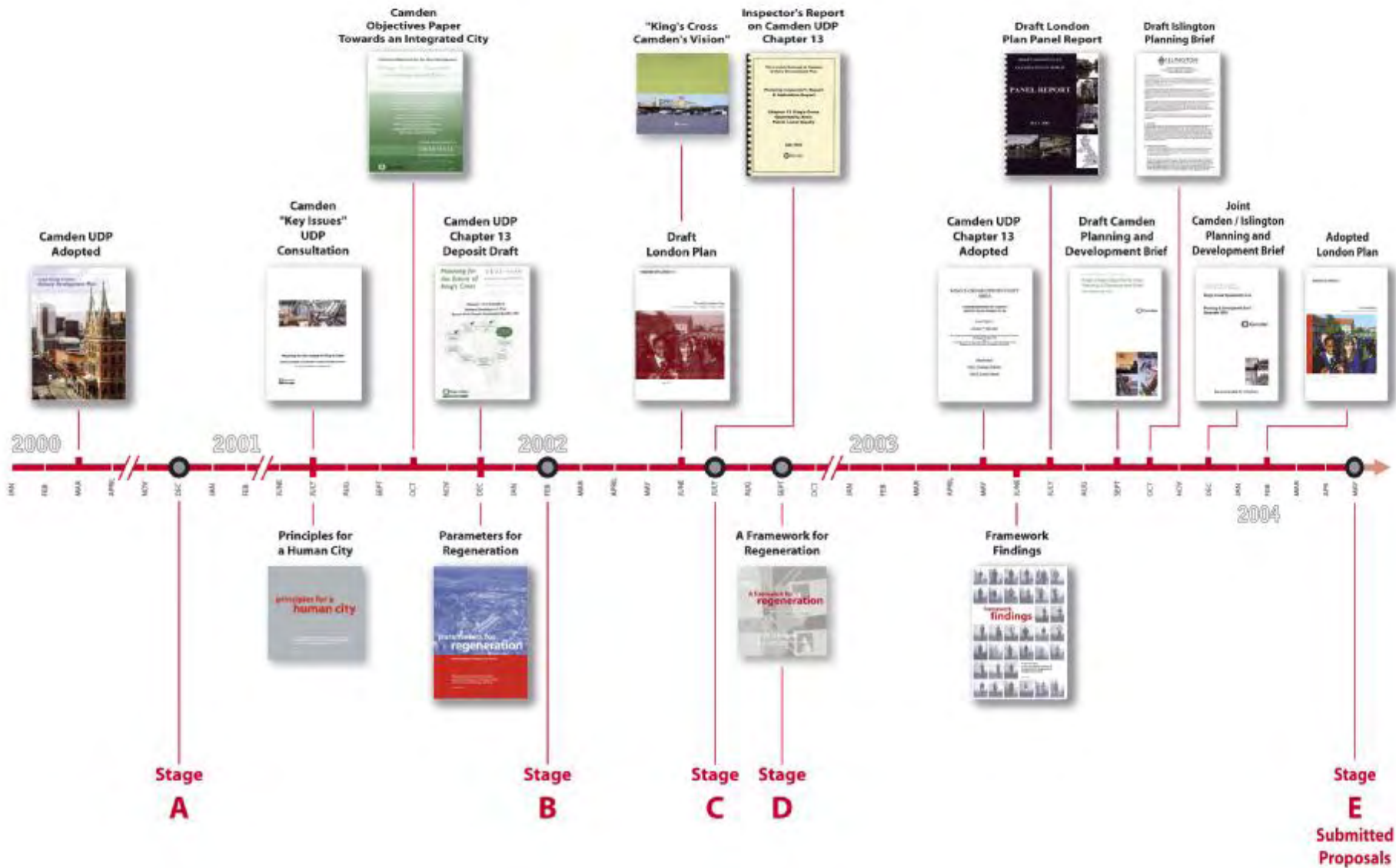
Flowchart Illustrating the Initial Applications and Supporting Documents





## **Appendix 2**

The Evolution of the Proposals within the Planning System





## **Appendix 3**

Extracts from the Planning Inspector's report into Chapter 13 'King's Cross Opportunity Area' of the Camden UDP, July 2002





"and none of the schemes brought to my attention, including those elsewhere in Camden, are directly comparable to the Opportunity Area ... car free housing schemes are few and far between ... It seems to me therefore that on the basis of available empirical evidence, the Council's confidence regarding the provision of car free housing must be viewed with caution. Certainly, requiring 75% car-free housing on this major development would be widely perceived as a considerable marketing challenge. Even with its locational attributes, there can be no certainty that 75% car free housing is achievable or, indeed, desirable. The Council place a considerable emphasis on the use of car-clubs as an alternative to car ownership but so far as I know the success or otherwise of such schemes is largely unproven. Interestingly, the Council's response to a different objection mentions that research indicates that up to 30% of social housing has a need for a car parking space. If that need was replicated across the site, it suggests that the 75% figure may be a touch too high at present. Moreover as circumstances change over time even the Council may come to view that a 75% car-free target is undesirable.

I am also cautious that it is car use rather than car ownership that is the key to the Council's aim to secure a sustainable form of development. Minimising car use is likely to depend primarily on the Council's ability to secure an integrated package of improvements to the local transport arrangements. In their absence, stringent controls on car ownership/car parking will simply exacerbate parking demand in adjoining areas. Bearing the above in mind, I am in no doubt that the original aim to "seek overall housing provision that is 75% car-free" should be deleted. Of course that bald aim is no longer favoured. Amendment 84 introduces text that indicates that the 75% figure is a target based on current circumstances. It also recognises that the target is one of a package of measures that will be applied to minimise car usage. I am in no doubt that the amendment is a significant improvement. Even so I consider that the reference to 75% being a target should be deleted. Rather, I consider that the reference to 75% car-free housing should be qualified to mention provision of a significant proportion of car-free housing possibly up to or about the 75% level. This wording is intended to provide a measure of flexibility on the one hand while recognising the potential to provide a significant amount of car-free housing on the other. The overall figure could reach 75% but it could be less. In practice the percentage is likely to vary across the site.

I have considered the alternative text favoured by the objector. This refers to the allocation of parking spaces by developers/landowners and to the creation of a Controlled Parking Zone. As I understand it, both would be essential elements of any agreed car-free housing



scheme. I see no difficulty including text on the lines suggested, but I am not persuaded that it should replace the reference to the anticipated proportion of car-free housing. The objector may gain some comfort from the fact that at the Inquiry the Council's witness confirmed that the 75% figure would be viewed as a guideline, not a requirement that might justify the refusal of otherwise acceptable development".

(Our underlining)



## **Appendix 4**

Policies RC1 – RC12 regarding the Regent's Canal in the adopted  
Camden UDP, March 2000

## 2 Introduction

- 15.4 Chapter 2 contains a description of the structure of the Borough, defined by looking at a number of characteristics of individual areas. Recognition of the differences between areas has been developed as a mechanism for reconciling competing development pressures (including the need for restraint) and as a tool for policy delivery. Part of this analysis has involved looking at the special character and quality of some areas (for example, in terms of their architectural quality, mix of land use activities or historic associations). Support for identifying appropriate areas of special quality or character, including conservation areas, is given in paragraph 8.8 of Strategic Guidance (RPG3). Two Areas of Special Character have been designated: the Regent's Canal and the Hampstead and Highgate Ridge. Specific policies for these areas are contained in this chapter (though policies in this chapter should be read in conjunction with those contained elsewhere in the Plan). Substantial parts of these areas receive additional protection as a result of their status as conservation areas. This chapter also includes a number of policies relating to Camden Town. These focus on key land uses such as retail markets, arts, entertainment and media and on transport issues.

## 3 The Regent's Canal Area of Special Character

- 15.5 The Regent's Canal, part of the Grand Union Canal, winds its way through many London Boroughs before reaching the Thames, forming a corridor of unique character. It is an important feature of historic and visual interest in the townscape and, following the decline of traditional canal-related commercial activities, has been increasingly recognised as a valuable resource for water-based leisure activities, for its ecological value and its potential for transportation and informal recreation. It is the Council's aim to conserve and enhance the existing character of the Canal and to improve its potential for recreation, transportation and wildlife.
- 15.6 The ever-changing vista, the variety and contrast of townscape elements and the informal relationship between buildings and canal contribute more than any other factors to the character of the Canal. It is possible to identify 17 distinct sections along the Canal, each with its own character. The sections vary considerably in water level, width and direction and in the nature and use of adjacent buildings and landscape.
- 15.7 The Regent's Canal has been designated as a conservation area and further guidance aimed at the preservation or enhancement of the character of each one of the 17 sections identified is contained in the document *The Regent's Canal in Camden (1983)*. In assessing development proposals that affect the Canal, the Council will also take into consideration the

London Canals Committee Standards for Canalside Development – Development Control Guidelines (1993). The Council is preparing new guidance in the form of a Regent's Canal Conservation Area Statement.

## Visual character

RC1 The Council will seek to preserve or enhance the diverse visual character of the Canal by ensuring that canalside development provides a variety in terms of massing and a sense of either enclosure or rurality as appropriate to the particular canal section concerned.

- 15.8 The character of the Canal changes dramatically, ranging from tightly enclosed spaces of "Venetian" townscape to wider open spaces; hard industrial townscapes contrast with softer semi-rural sections. Buildings sometimes rise sheer from the canal edge or are set back making space for landscaping. This diversity makes the Canal experience more enjoyable and should be perpetuated when redevelopment occurs.

## Scale

RC2 The Council will seek to ensure that all new buildings maintain the established scale of the particular section of the Canal. The height of buildings should reflect that of existing canalside buildings or as a general rule the height of buildings which frame the Canal should not exceed four domestic storeys on either side of the Canal as taken from towpath level.

- 15.9 The Regent's Canal derives much of its character from its narrow width and the small scale of canal structures, such as bridges and locks, and of the canalside buildings. Whilst the latter vary in scale, they only exceptionally exceed four storeys. Buildings above four domestic storeys only occur in the Camden Lock (west) and Bonny Street sections of the Canal and should not be taken as a guide for future development. This height limitation is in line with the London Canals Committee guidelines.

## Views and skyline

RC3 The Council will resist any development that has an adverse impact on the existing skyline, intrudes into important canalside views or obstructs views to familiar landmarks.

- 15.10 Important views along the Canal and to and from the surrounding area relate the visual experience of the Canal to the urban context. Well-known landmarks, whether adjacent to the canal or seen from a distance, act as points of reference and assist with orientation.

## Traditional uses and buildings

- RC4 The Council will seek to protect commercial uses and activities traditionally associated with the Canal and retain buildings which contribute to its traditional character. On all other canalside sites, the Council will seek a mix of uses which complement the character and function of the Canal, appropriate to the character of the particular section.
- 15.11 With the decline of freight transport, commercial activities that relied on the waterways have ceased. Some buildings from that period remain and make a major contribution to the character of the Regent's Canal and add interest to the canal scene. A mix of uses, including recreational uses, housing and employment-generating uses will sustain public interest during a wide period of the day. Light industrial uses in particular contribute to the preservation of the traditional character of the waterway.

## Historic features and structures

- RC5 The Council will seek the retention and, wherever possible, the restoration of historic features and structures which contribute to the character of the Canal. In the case of new development, the Council will seek to ensure that the design and materials of any proposals for the towpath and banks, including landscaping, respect the traditional character of the Canal.
- 15.12 Boliards, retaining walls, bridges and abutments, plaques and other elements of industrial archaeology that date from the period when the Canal was used for commercial navigation are an important part of our heritage. Improvements to, or provision of, access ramps and stairs, towpath surfaces, railings, fences, seats and other similar features will have to be sensitively designed to preserve the appropriate character of the Canal environment.

## Recreation

- RC6 The Council will encourage development of the recreational and leisure potential of the canal in so far as this does not adversely affect the nature conservation interest and is consistent with the capacity of the waterway and the amenity of the surrounding area. The Council will seek to ensure that existing water-based activities are not displaced by redevelopment or change of use.
- 15.13 The canal offers a unique opportunity for water-related recreation within easy reach of most parts of the Borough. Cruising and canoeing clubs are based on the canal in Camden and there are quiet stretches favoured by anglers. Indiscriminate provision of new recreational or leisure facilities



along the canal is undesirable as it could give rise to conflicts between different users and could disrupt the tranquillity and visual character of certain stretches of the canal as well as the amenity of local residents. Camden Lock and Kings Cross are areas with potential for additional facilities with good connections to public transport.

### Access

RC7 The Council will seek to improve public access to the canal. Wherever possible, new access points designed to disability standards should be incorporated into development proposals, linking the towpath more closely with the local pedestrian network. The Council will encourage this provision where there are gaps between existing access points and in areas of intensive use.

- 15.14 The use of the canal towpath as a pedestrian route can only be effective if frequent connections to the street above are established. Long sections without access, in particular those which are not overlooked, can give rise to fears of possible attacks and discourage use.

### Green Chain

RC8 The Council will seek to protect and enhance the canal as a Green Chain to provide a habitat for wildlife and a pedestrian route in a pleasant environment. The Council will promote the canal as part of the network of Metropolitan Walks and will seek to create circular routes to link the canal to other open spaces.

- 15.15 The Regent's Canal is a designated Green Chain as well as forming part of the Metropolitan Walks system. It provides a rare wet habitat which enriches the ecology of the inner urban areas along its course and provides an attractive route for pedestrians in a safe carfree environment.

### Information and facilities

RC9 In the interests of recreational and leisure enjoyment of the canal, the Council will work with British Waterways to promote the provision of appropriate signposting and informative and interpretative material and will encourage public art along the canal corridor. The design and siting of any such provision should respect the traditional appearance, character and setting of the canal. The Council will seek to secure the re-opening of a canal information centre, preferably at Camden Lock.

- 15.16 The canal is not very visible and access points are not easy to identify from street level. It is important to assist potential users with directions and promote the recreational use of the canal through information and

education. Selective incorporation of public art can enhance the canal by reinforcing historic references and contributing to legibility and orientation. Camden Lock is located in an area which receives large numbers of visitors. Provision of an information centre in this location could help encourage visitors to make better use of the canal environment and its amenities.

## Waterspace

RC10 Generally no buildings will be permitted which would encroach on, cantilever or bridge over the waterspace or towpath. Where, in the past, canal basins have been filled in, their reinstatement for water-based recreation will be encouraged.

- 15.17 If the potential of the canal for water-based recreation, transportation and as an attractive pedestrian route is to be maximised, it is necessary to resist development that would restrict these opportunities. The excavation of basins could provide suitable water space for recreation as well as restoring some of Camden's industrial archaeology.

## Moorings

RC11 The Council will welcome the provision of moorings in locations where these will not hinder navigation of the waterway or adversely affect the amenities in the surrounding area. Moorings should be provided on the non-towpath bank and only in locations with good accessibility, and where adequate servicing facilities can be provided.

- 15.18 The Council recognises the demand for permanent moorings, including for house-boats. Kings Cross has the potential for providing well-serviced permanent moorings, including residential, and Cumberland Basin could support a number of these as well, especially if the existing basin were to be extended by the excavation of part of the original spur to Cumberland Market. Permanent moorings need to be adequately serviced in order to function without causing problems to local amenities and interference with pedestrian movement on the towpath. When considering applications for such moorings, the Council will have regard to the London Canals Committee Guidelines for Canalside Moorings. It is generally accepted that residential moorings require planning permission and can thus be regulated by the local planning authority, whilst other moorings are a function of British Waterways statutory duties and are therefore beyond the control of the local authority.

## Transport

RC12 The Council will promote the use of the canal for passenger and freight transport provided that the level of use remains compatible with its use

for water-based recreation and there is no unacceptable adverse effect on amenity or the environment.

- 15.19 The canal provides a relatively slow but uncongested route through the Borough and is suited to the short distance movement of passengers as well as the transport of bulky low unit cost freight, such as construction materials. Significant environmental benefits will result if some road transport could be transferred to the canal. There is a need to control levels of activity to ensure that there is no conflict with the recreational objectives for the waterway or its ecological potential.

## 4 The Hampstead and Highgate Ridge Area of Special Character

- 15.20 Hampstead Heath is a unique area of Metropolitan Open Land which, together with the area of developed land surrounding it, occupies the high ridge between Hampstead and Highgate. This slopes down along the eastern and western edges with the southern edge being the start of the Thames flood plain. Much of its character and variety derives from the characteristic topography of the area, resulting in considerable and often abrupt changes of ground level, and a significant contrast between the dense urban quality of the cores of Hampstead and Highgate villages and the spaciousness and rural atmosphere of the immediate fringes of the Heath (with the exception of the areas to the south). There are magnificent views across the Heath and from the Heath to the east over the Highgate plateau and Dartmouth Park slopes, with the spire of Saint Michael's church emerging on the skyline. The ridge also offers long distance views to the south, with a panorama of central London and the areas beyond.
- 15.21 There are seven conservation areas within the boundaries of the area, covering most of the developed area: Hampstead Village, Highgate Village, Redington/Frognaal, South Hill Park, Mansfield, Dartmouth Park and Holly Lodge Estate. In addition to the policies for the Area of Special Character, the Council will take into account guidance for individual conservation areas (forming part of Supplementary Planning Guidance) when assessing proposals for development.

### Character and setting of the Heath

- HR1 The Council will seek to preserve and/or enhance the character of the Heath and its setting and will seek to ensure that any proposals for the management by the City Corporation and English Heritage of the Heath and Kenwood respectively are compatible with this objective and other policies in this Plan.




## **Appendix 5**

How the Proposals Respond to Camden's Sustainability Objectives

# Sustainable Development Matrix

How the Proposals Respond to Camden's Sustainability Objectives:  
(Objectives based on Camden's Sustainability Appraisal of the Replacement UDP Deposit Draft)

		Main Site Development Specification	Triangle Site Development Specification	Implementation Strategy	Planning Statement	Environmental Statement	Urban Design Statement	Urban Design Guidelines	Statement of Community Engagement	Environmental Sustainability Strategy	Public Realm Strategy	Construction Code of Practice	Regeneration Strategy	Transport Assessment	Green Travel Plan	Retail Impact Assessment	Listed Building & Conservation Area Consent Applications	Listed Building and Conservation Area Consent Supporting Statements	Triangle Explanatory Statement
Quality & affordable housing	Affordable housing development																		
	Development at an appropriate density and standard																		
Safe & healthy community	Provision of healthcare facilities in areas of need																		
	Healthy living e.g. provision of walking, cycling and recreation facilities																		
	Consideration of safety issues and fear of crime																		
High quality design in an historic environment	High quality urban design considering characteristics of existing townscape																		
	Enhancement of public realm and local distinctiveness																		
	Protection and enhancement of conservation areas and listed buildings																		
Efficient use of land, buildings & infrastructure	Reuse or improvement of buildings and land, that are vacant, under-utilised or in disrepair																		
	Flexible new buildings																		
Access to local facilities	Mixed-use development																		
	Retention and development of key services																		
	Location of services in proximity to public transport																		
Poverty and social exclusion	Development that facilitates social cohesion																		
	Access to buildings and services for physically impaired																		
	Development in areas in need of economic development																		
Sustainable communities	Sustainable inward investment benefitting environment, social well-being and economy																		
	Access to employment opportunities for local people																		
New & expanding businesses	Retention and growth of existing, locally-based industries																		
	New investment in the local economy and opportunities for employment																		
Transport	Development at locations that enable walking, cycling and/or use of public transport																		
	Provision of infrastructure for walking, cycling and/or the provision of public transport																		
	Access for all to public transport																		
	Transportation of freight by means other than road																		
	Use of information technology to reduce travel demand																		
Noise	Green transport plan																		
	Improve amenity by minimising impacts associated with noise																		
Water	Protection and enhancement of quality of Camden's waterways																		
	Sustainable use of water resources																		
Habitats & biodiversity	Enhance and protect natural habitats (includes terrestrial and aquatic)																		
	Protection of biodiversity and open space																		
Waste	Reduction of waste during development process and/or during operation																		
	Movement of waste up the hierarchy																		
Air Quality	Reduce carbon dioxide and other greenhouse gas concentrations in the atmosphere																		
	Reduce discharge of particulate matter into the atmosphere																		
	Contribute to an improvement of air quality																		
Energy	Generation and use of renewable energy																		
	Energy efficiency																		
	Use of alternative modes of transport to the private car																		
Materials	Maximise natural daylighting																		
	Efficient supply and use of materials (including reuse and recycling)																		
	Sustainable construction																		

**Key**  
 Shaded boxes indicate where objectives are addressed within the application package



## **Appendix 6**

Density Guidelines from the London Plan  
(Table 4B.1: Density, Location and Parking Matrix).





Table 4B.1 Density Location and Parking Matrix (habitable Rooms and dwellings per hectare)

		Car parking provision	High 2-1.5 spaces per unit	Moderate 1.5-1 space per unit	Low Less than 1 Space per unit
		Predominant Housing type	Detached and linked houses	Terraced houses & flats	Mostly flats
Location	Accessibility Index	Setting			
Sites within 10 mins walking distance of a town centre	6 to 4	Central			650-1100 hr/ha
					240-435 u/ha Ave. 2.7 hr/u
		Urban		200-450 hr/ha 55-175 u/ha Ave. 3.1 hr/u	450-700 hr/h 165-275 u/hr Ave. 3.0 hr/u
		Suburban		200-300 hr/ha 50-110 u/ha Ave. 3.7 hr/u	250-350 hr/ha 80-120 u/ha Ave. 3.0 hr/u
Sites along Transport corridors & sites close to a town centre	3 to 2	Urban		200-300 hr/ha 50-110 u/ha Ave. 3.7 hr/u	300-450 hr/ha 100-150 u/ha Ave. 3.0 hr/u
		Suburban	150-200 hr/ha 30-65 u/ha Ave. 4.4 hr/u	200-250 hr/ha 50-80 u/ha Ave. 3.8 hr/u	
Currently remote sites	2 to 1	Suburban	150-200 hr/ha 30-50 u/ha Ave. 4.6 hr/u		



A6.1 The matrix expresses residential density as habitable rooms per hectare and dwelling units per hectare. Appropriate density ranges are related to location, setting in terms of existing building form and massing, and the index of public transport accessibility (PTAL). Site setting can be defined as:

- Central – very dense development, large building foot prints and buildings of 4-6 storeys and above eg larger town centres, all over London and much of central London
- Urban – dense development, with a mix of different uses and buildings 3-4 storeys eg town centres, along main arterial routes and substantial parts of inner London.
- Suburban – lower density development, predominantly residential of 2-3 storeys eg some parts of inner London, much of outer London.



## **Appendix 7**

Extract from the Retail Impact Assessment Report: Retail Planning Policy Context

## 2 Policy context

### 2.1 Overview and scope

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- 2.1.1 King's Cross is a designated "opportunity area" and a number of the planning policies that underpin and reflect this designation expressly or by implication support a significant retail element as part of a high density, mixed use development.
- 2.1.2 This section reviews these policies as context for the work that follows. It explains that the Retail Impact Assessment presented in this report has been scoped to address the retail planning policy matters pertinent to King's Cross Central, namely the scale and mix of retailing and its impact on neighbouring centres in Camden Town, Islington and Westminster.
- 2.1.3 The fundamental tenet of the planning system is that it is plan-led. Decisions about development should be made in accordance with the development plan unless material considerations suggest otherwise. The basis for retail policy in development plans is PPG6. This is predicated on: ensuring consumer choice; protecting the vitality and viability of town centres, promoting a mix of uses; and minimising the need to travel by locating trip generating development where there is high public transport accessibility. The PPG6 stance is also interpreted through regional policy in RPG3 and the London Plan. Both RPG3 and the Plan have at their heart the development of London's role as a World City, particularly in the context of the Central Area, and the realisation of major opportunity areas such as King's Cross whilst meeting the needs of diverse communities.
- 2.1.4 Reflecting this policy context, this chapter is structured to cover the following:
- Development plan policy, namely Camden's adopted UDP, in particular Chapter 13 on the King's Cross Opportunity Area, the replacement Deposit Draft (Section 9 of which is the same as the adopted Chapter 13), and the Islington UDP;
  - National guidance as set out in PPG6 and draft PPS6,
  - Regional policy in RPG3 and the London Plan.
  - Supplementary Planning Guidance as set out in the King's Cross Opportunity Area Planning and Development Brief, adopted by both Camden and Islington.
- 2.1.5 Separate, additional consideration is given to policy towards leisure uses.
- 2.1.6 The overall conclusion drawn is that this study should assess the scale and mix of the proposed retail and commercial leisure components to determine their impact on the viability and vitality of neighbouring centres.

### 2.2 Development Plan Policy

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#### The Camden UDP

- 2.2.1 In May 2003 Camden adopted new planning policies for the King's Cross Opportunity Area (KCOA). These policies are set out in a revised Chapter 13 to the adopted UDP and are in Section 9 in the Deposit Draft Replacement UDP.

- 2.2.2 Chapter 13 policies promote comprehensive mixed use development. Policy SKC2 seeks a “genuinely mixed use development”. The explanatory text goes on to state that “if the development of the Opportunity Area is to create a sustainable urban quarter then a mix of uses through each major phase of the development will be needed.”
- 2.2.3 It goes on to say that a “mixed use development will help to achieve a reinvigorated local economy and socially balanced communities.....a successful mix will include retail, cultural and leisure facilities.....”. (para 13.20.)
- 2.2.4 Policy KC1 states that the Council will grant permission for mixed use development, which includes “appropriate levels of supporting community, leisure and retail activities.”
- 2.2.5 Reasoned justification para 13.35 refers to Policy RE4 in the adopted UDP. The Council recognises in that policy that the KCOA is a suitable location for uses that are major generators of travel demand including shopping and leisure. The KCOA is accorded the “first preference” for locating such development, within the sequential test enshrined within Policy RE4.
- 2.2.6 Reasoned justification para 13.35 comments on the types of retail that may be appropriate at King’s Cross and the need to consider the role of that retailing and the relationship with neighbouring centres:

*“Large-scale retail development would be inappropriate if it would threaten the viability and vitality of neighbouring centres in Camden Town, Islington and Westminster. The Council has recognised in policy RE4 that the King’s Cross Opportunity Area is a suitable location for uses that are major generators of travel demand such as office employment, shopping, higher education and leisure, and policy KC1 identifies retail activity as a component of mixed use development. Consistent with RPG3, near the main transport interchanges and termini there may be scope for specialist retail outlets to serve long distance travellers and tourism. Shopping providing accessible, essential convenience services will be important to meeting the needs of local communities and will be encouraged. New neighbourhood centres and small parades may be appropriate”.*

- 2.2.7 The King’s Cross specific policies noted above are replicated exactly within the Deposit Draft Replacement Camden UDP (Section 9). Furthermore, Draft Policy SD5, the equivalent of Policy RE4, continues to recognise King’s Cross as a location suitable for development with significant travel demand, including retail and leisure, according it the highest order of preference within the policy.
- 2.2.8 Policies RE4 and draft SD5 echo PPG13, para 21, which provides advice on the use of “key sites”. These are “the most accessible sites, such as those in town centres and others which are, or will be, close to major transport interchanges. These opportunities may be scarce. They [LPAs] should... allocate or reallocate sites which are (or will be) highly accessible by public transport for travel intensive uses (including offices, retail, commercial leisure, hospitals and conference facilities), ensuring efficient use of land”.
- 2.2.9 RPG3, para 6.4 provides similar advice on the allocation of travel-intensive



uses at transport nodes; see also section 2.4 below.

2.2.10 Within the Deposit Draft Replacement UDP, Policy R2 states that:

*“the Council will only grant planning permission for shopping and service uses, food and drink uses, licensed entertainment and markets...where it considers the development:*

- *will not cause harm to the character, function, vitality or viability of the area, or other areas it affects; and*
- *is readily accessible by a choice of means of transport....”*

2.2.11 The supporting text goes on to say that “shopping and leisure are significant generators of car travel....For locations inside and outside centres, the availability of a choice of transport is of major importance.”

2.2.12 In conclusion, the provision of retail and leisure uses as part of a mixed use development at King’s Cross Central is in accordance with the adopted and emerging Camden UDP policies. At the same time, the local policy context requires an assessment to be made of the scale and mix of retailing proposed and its impact on neighbouring centres in Camden Town, Islington and Westminster. This study has been scoped to address these matters. It considers the likely impact of the King’s Cross Central proposals on the viability and vitality of neighbouring centres. It also takes account of the supplementary guidance in the Joint Planning and Development Brief for the KCOA as explained in section 2.6 below.

#### **The Islington UDP**

2.2.13 UDP policy relevant to the Islington part of the Triangle Site is to be found throughout the adopted Islington UDP (June 2002). The Triangle Site, along with adjoining areas east of York Way is within one of the Borough’s four main Priority Areas for Regeneration (Policy E12). The focus for regeneration within this King’s Cross priority area are to transform it into a vibrant and distinctive new quarter for London, and to maximise the benefits for Islington arising from the development of King’s Cross Central, which is acknowledged to be mainly located in Camden (para 6.4). Approximately coincident with this designation is the King’s Cross Special Policy Area, which gives more detailed guidance to influence future development, namely the minimisation of adverse impacts of infrastructure projects; the effective use of regeneration monies, and the need for the local community to receive a fair share of benefits (Policy Imp18). Within these two wider policy areas, the Triangle Site itself is identified as an Area of Opportunity, a designation which indicates that the Council’s desire for investment in the plan period, but where the precise form and boundaries are uncertain (Policy Imp11). The Islington UDP mirrors the encouragement of mixed use development in strategic Policy ST14 and local policy Imp5, which both apply throughout the Borough.

## **2.3 National Policy**

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2.3.1 National retail planning policy is set out in PPG6 (June 1996) as clarified by the Ministerial statement of 10 April 2003 following case law. Draft PPS6 was published in December 2003 and is out for consultation until March 2004.

Overall PPG6 and PPS6 advocate the plan-led approach and as such the development control requirement for an individual development to demonstrate need and to conform to a sequential test do not apply to King's Cross Central. These issues – need and the sequential approach - have already been dealt with at the appropriate (UDP) level and do not fall to be considered again, in the context of a specific application brought forward in accordance with UDP policy.

2.3.2 Instead, the main issues to be addressed in PPG6 terms, at this stage, are the scale, mix and impact of the retail development proposed. Hence, the sections of national guidance which are of most relevance to setting up a robust methodology for assessing the effects on surrounding centres, as required by Camden's Policy KC1 (see above), are PPG6, paras 4.3 and 4.13 and draft PPS6, para 3.4.

2.3.3 Within this context, a summary of the main points in existing and emerging national guidance is given below.

#### **PPG 6**

2.3.4 Chapter 1 of PPG6 explains the Government's objectives to:

- *“sustain and enhance the vitality and viability of town centres;*
- *focus development, especially retail development, in locations where the proximity of businesses facilitates competition from which all consumers are able to benefit and maximises the opportunity to use means of transport other than the car;*
- *maintain an efficient, competitive and innovative retail sector; and*
- *ensure the availability of a wide range of shops, employment, services and facilities to which people have easy access by a choice of means of transport.”*

2.3.5 King's Cross Central's locational attributes close to such a major public transport interchange are undeniable and fully consistent with PPG6 objectives. At the same time, the scale of opportunity for diverse and innovative forms of retail, is likely to depend on the demands arising from:

- Mixed use development, providing several hundred thousand square metres of new B1 development and up to 2,550 new homes;
- The office workers and residents that will work and live within the new development;
- The major railway stations of King's Cross and St Pancras and the tourists, commuters and other passengers that will use them;
- The presence of many historic buildings and structures that lend themselves to A1/A2/A3 refurbishment; and
- The needs of existing local communities.

Each of these issues is addressed within this Retail Impact Assessment.

2.3.6 Overall PPG6 Chapter 1 endorses and promotes the plan-led approach. It provides guidance to local authorities on how they should take account of national policy in preparing their development plans, including indicating a hierarchy of centres and recognising that the role, function and relative

importance of centres will change over time (para 1.5); planning positively for shopping, leisure and entertainment and other uses working with the private sector to assess need or market demand, and identifying locations and sites for development (para 1.7); and adopting a sequential approach to selecting sites for new retail development (1.10).

- 2.3.7 Camden have complied with this guidance in setting out their UDP policies. They have provided a strategy for the location of employment, shopping, leisure and entertainment, hospitals, higher education and other uses which generate many trips and which should be well served by public transport, as explained above. The sequential approach required by PPG6 has been applied, through the adoption of UDP policies. In both the adopted and emerging Plans, the relevant policies (RE4 and deposit draft SD5) identify King's Cross as a suitable location for retail and other travel intensive uses, to be considered first, as part of a sequential approach.
- 2.3.8 Indeed, the plan-led system, at all levels, recognises that King's Cross Central should accommodate Central London's activities, development and growth, with major mixed use development to provide a new quarter for London. As explained below in Section 2.4, King's Cross is a major Opportunity Area within London's Central Activities Zone (CAZ), of particular metropolitan significance, with policy designations supporting comprehensive redevelopment in RPG3 and the London Plan.
- 2.3.9 Chapter 4 of PPG6 addresses the assessment of new retail developments. It explains that new retail developments should support the Government's objectives of sustaining and enhancing existing centres and should be in accord with the strategy for retail development set out in the development plan (para 4.1). Various tests are set out in the rest of the chapter, only some of which apply to King's Cross Central because the principle of retail provision here forms part of the plan-led strategy.
- 2.3.10 The matters listed at PPG6 para 4.3 provide a useful checklist for addressing the matters of scale, mix and retail impact in the context of Camden Policy KC1 and explanatory text para 13.35 (see above). This checklist has therefore been used to help determine the scope of this Retail Impact Assessment, in particular the means of examining the physical capacity of neighbouring centres to accommodate growth in catchment area spending.
- 2.3.11 PPG6 Para 4.13 sets out five categories of evidence that should be supplied by all applications for retail development over 2,500 square metres. The first factor (*whether the applicant adopted a sequential approach*) is not relevant for the reasons given above. The third factor (*accessibility*) is not in question as the King's Cross Central site has the best public transport accessibility in London (see London Plan, para 2B.25) and extensive facilities to encourage walking, cycling and new bus routes are included in the application. But in any event, accessibility is addressed fully in a Transport Assessment submitted in support of the planning applications. The fourth factor (*likely changes in travel patterns*) is also covered in the Transport Assessment. The fifth factor (*environmental impacts*) is covered in the EIA.
- 2.3.12 Para 4.3's second factor (*the likely economic impacts on town centres, and the cumulative effects of recently completed developments and outstanding planning permissions*) is relevant to King's Cross Central and has been taken into account in setting up the methodology for this study.
- 2.3.13 The methodology has also had regard to the Ministerial Statement, April

2003. To assess the impact of the King's Cross Central proposals on the viability and vitality of neighbouring centres, quantitative analysis has been undertaken separately for convenience and comparison goods.

#### **Draft PPS6**

- 2.3.14 Draft PPS6 was published in December 2003 and is out for consultation until March 2004. The draft retains the fundamental objectives of the plan-led approach, protecting the vitality and viability of town centres, focussing trip generating development in areas of high public transport accessibility and promoting consumer choice and an efficient retail sector.
- 2.3.15 As well as topic-based objectives, draft PPS6 lists wider policy objectives (para 1.4) which are pertinent to the proposals at King's Cross Central:
- *“to promote social inclusion, ensuring that local communities have access to a range of shopping, leisure and local services, and that gaps in provision in areas with poor access to facilities are remedied;*
  - *to regenerate deprived areas, creating new and additional employment opportunities and an improved physical environment;*
  - *to promote economic growth of regional, sub-regional and local economies;*
  - *to deliver more sustainable patterns of development, ensuring that locations are fully exploited through high-density, mixed use development and promoting sustainable transport choices, including reducing the need to travel and providing alternatives to car use; and*
  - *to promote good design, improving the quality of public open spaces, protecting and enhancing the architectural and historic heritage of centres, and ensuring that town centres provide an attractive and safe environment for businesses, shoppers and residents.”*
- 2.3.16 Chapter 2 of draft PPS6 urges regional and local planners to “rebalance” the network of centres to ensure that it is not overly dominated by the largest centres, and that there is a more even distribution of facilities, and that people's everyday needs are met at the local level (para 2.7).
- 2.3.17 Regional Spatial Strategies, in this case the Draft London Plan, should “make clear strategic choices about where growth should be encouraged, including new centres in areas of planned major growth” (para 2.11). The Draft London Plan has done this and has identified King's Cross as a major opportunity area suitable for significant mixed use development.
- 2.3.18 Draft PPS6 also re-emphasises the importance of the type of high density, mixed use development centred on a transport node, as proposed at King's Cross Central (para 2.16).
- 2.3.19 Draft PPS6 states that “the scale of new facilities should be directly related to the role and function of the centre and catchment that they seek to serve” (para 2.33). Thus, a major new development such as that proposed for King's Cross should have an appropriate scale of provision.
- 2.3.20 Draft PPS6 Chapter 3 covers issues that should be considered by local authorities in determining planning applications, whether they bring forward a development plan allocation, or are on other sites (para 3.1). These largely accord with the stance taken in PPG 6 and the Camden UDP. The five

issues listed in para 3.4 are similar to those in PPG6, para 4.13, as detailed above. Of these, factors i) and iii) (*need for the development, and that there are no more central sites for the development*) are not relevant to King's Cross Central for the reasons given above. Factor v) (*that locations are accessible*) is not in question.

2.3.21 Factors ii) (*that the development is of an appropriate scale*) and iv) (*that there are no unacceptable impacts on existing centres*) are addressed directly in this Retail Impact Assessment.

2.3.22 The draft PPS also highlights a number of other material considerations, to be taken in to account when assessing development proposals (para 3.30):

- physical regeneration;
- employment<sup>1</sup>;
- economic growth; and
- social inclusion.

2.3.23 These are particularly relevant to King's Cross Central where the proposal seeks to regenerate a physically degraded site in an area suffering severe deprivation, providing a range of new employment opportunities.

## 2.4 Regional Policy

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2.4.1 The Mayor's London Plan, adopted in February 2004 after an Examination in Public in March/April 2003, replaces Strategic Guidance for London Authorities, RPG3 (1996). Despite this, RPG3 still provides relevant context for the King's Cross Central proposals, since it is the London-wide guidance that influenced the current development plan.

### **The Importance of King's Cross**

2.4.2 Both the London Plan and RPG3 before it suggest that this site is of great regional and national significance and is expected to play an important part in London's future growth. A major mixed use development of this type and scale would be expected to contain retail provision.

2.4.3 In RPG3, the Secretary of State considered that "a realistic definition of the Central Area extends from Kensington and Knightsbridge in the west to Whitechapel in the east and from Marylebone and King's Cross in the north to the South Bank between Vauxhall and Tower Bridge" (para 2.24).

2.4.4 More detailed guidance on extending Central Area uses to the edges of this area is given under the label of the "Central Area Margins". New economic roles, for example in cultural industries, leisure and tourism need to be developed here (para 2.33). Also:

*"...The Central Area margins need to consolidate their existing economic strengths and develop new economic roles. The major development sites in the margins need to be brought forward for development that can rebuild the local urban structure, define a new image for their areas, extend Central Area uses where appropriate*

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<sup>1</sup> In the development control context employment considerations should encompass the creation of higher skill opportunities or opportunities that are particularly important given the local labour market

*and bring benefits to their local communities. Major international termini at King's Cross/St. Pancras, Paddington and Waterloo are particularly significant.” (para 2.3.)*

*“The scale and location of the former railway lands, adjoining the proposed Channel Tunnel Rail Link (CTRL) terminus at St Pancras and situated within one of the most deprived areas of London, gives it particular metropolitan significance. Its catchment area could be enhanced by domestic services on the CTRL, and by the proposed Thameslink 2000. Proposals should be brought forward for a new quarter of London with a distinctive identity, enhancing features of historic and conservation importance. There will be scope for development for business, tourism and leisure, including areas of high density uses. It will be appropriate to provide housing and community facilities and measures to enhance access to employment, which benefit neighbouring local communities.” (para 2.37.)*

- 2.4.5 The London Plan includes the King's Cross Central site within the Central Activities Zone, which is defined as “the core location for international business and finance and as a national transport node” (para 5.25). The King's Cross Central site is therefore of national as well as regional significance, which should be reflected in any development proposals and their assessment against planning policy.

#### **The Retail Network in London**

- 2.4.6 In RPG3, para 5.3, the Secretary of State stated that, within London, individual Boroughs cannot satisfactorily undertake the job of setting out the range and hierarchy of centres in isolation. He therefore looked to LPAC (now the GLA) and the Boroughs jointly to provide the framework, which should be reflected in the strategic policies of the UDP. In 1996 LPAC indicated a hierarchy or “network” of centres and, in RPG3, the Secretary of State commended a description of centres derived from LPAC and GOL research as a basis for considering the future of centres and drafting appropriate policies and proposals in UDPs.
- 2.4.7 The London Plan illustrates the location of centres in the international, metropolitan, major and district centre categories of London's network of centres (Map 3D.1) and these are listed together with the remaining category of local and neighbourhood centres in Annex 1. This categorisation follows the LPAC network, which was illustrated down to major centres in RPG3 Figure 5.1.
- 2.4.8 This network depiction does not indicate any individual strategic town centres in Central London, identifying only the West End and Knightsbridge as an international centre. This approach is carried through into the adopted Camden UDP, for example, within which Tottenham Court Road is not designated separately as a town centre; it is treated as simply part of the West End.
- 2.4.9 There are many other centres within Central London that are not formally designated as town centres in their own right, within the London network. New developments providing substantial increases in retail floorspace (in excess of 100,000 square metres) have continued to take place, for example within the City of London, without reference to whether individual sites are

within, outside or on the edge, of individual 'town centres'. Whilst Canary Wharf is not designated as a town centre. Nevertheless, the development includes substantial retail, restaurants and leisure, predominantly serving the office and local resident population.

- 2.4.10 RPG3 para 5.2 states clearly that: "PPG6...is applicable to London, but needs to be applied with care as London has many centres performing different functions."
- 2.4.11 RPG3 further explains that the LPAC network is intended to be flexible: "the hierarchy on which this is based must not be regarded as rigid, rather it is a description of centres at the present on the basis of defined criteria. In the future, some centres may increase their position in any hierarchy, while others may revert to a more local role. Planning activities should seek to guide the future of centres in the light of continuing realistic assessments rather than attempt to maintain a centre at any particular position in the hierarchy." (para 5.4).
- 2.4.12 At para 5.5, under the heading "large centres", RPG3 comments that: "the interrelationship of centres with transport and regeneration activity will be important."
- 2.4.13 It goes on: "in areas of regeneration, intensive redevelopment may add population and economic activity which should be served by accessible facilities. If, as a result of planning policy and regeneration, levels of population and employment in London increase, then it is likely that some centres may be able to rise up the hierarchy."
- 2.4.14 The London Plan promotes a polycentric strategy for London's development by promoting the strategic importance of London's town centres (Policy 2A.5). The Plan also acknowledges flexibility within the London network of centres. It envisages that some centres may need to be reclassified over time in the light of regular town centre health checks. The medium for achieving this would be through the proposed Sub-Regional Development Frameworks (para 3.227). The London Plan also stresses the importance of thriving local convenience shopping, especially for less mobile people (para 3.231).

#### **London-wide guidance on the King's Cross Opportunity Area**

- 2.4.15 The London Plan is based on the principles of sustainability, seeking to reduce the need to travel, and concentrating high density development at transport nodes. King's Cross is identified as a mixed use strategic Opportunity Area within the Central Activities Zone (CAZ; Map 2B.2).
- 2.4.16 Para 5.37 recognises that King's Cross has the best public transport accessibility in London and refers to its "central location and unique public transport accessibility."
- 2.4.17 Policy 5B.2 states that within the CAZ, boroughs should accommodate commercial development associated with business, tourism and retail, subject to the promotion of housing and identified special policy areas. Policy 3B.4 promotes mixed use development within the CAZ and Opportunity Areas. Developments in the Central London Opportunity Areas will be expected to maximise residential and non-residential densities and to contain mixed uses (Policy 5B.4).
- 2.4.18 Policy 3C.1 "integrating transport and development", encourages patterns and forms of development that reduce the need to travel especially by car and requires "high trip generating development only at locations of both high

levels of public transport accessibility and capacity". This further strengthens the case for this type of development within a mixed use context at King's Cross Central.

- 2.4.19 In short, there is widespread acceptance that retail development within the King's Cross Opportunity Area would be appropriate and in line with wider policy objectives.

## **2.5 Leisure**

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- 2.5.1 King's Cross Central is at the top of the search hierarchy in the sequential approach to determining the location of leisure uses in Policy LC2 of Camden's adopted UDP and draft Policy C3 of the Replacement UDP. Islington Council is also supportive of proposals for leisure, cultural and recreational facilities, particularly where serving areas and population groups that currently have least choice (adopted UDP Policy R1). The development of arts, cultural and entertainment activities are encouraged in town centres and at other accessible locations (Policy R21).
- 2.5.2 PPG6 emphasises the role of leisure and entertainment in enhancing the vitality of town centres (para. 2.19). The guidance also states that leisure uses should be directed to town centre/edge of centre sites. However, where this is not possible they should be directed to areas of high accessibility (para. 2.22). The guidance is particularly relevant to the location of cinemas.
- 2.5.3 Accordingly, this Retail Impact Assessment specifically assesses the potential to accommodate multiplex provision at King's Cross Central.

## **2.6 King's Cross Opportunity Area Planning and Development Brief**

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- 2.6.1 The KCOA Planning and Development Brief, adopted by both Camden (in December 2003) and Islington (in January 2004) provides a further elaboration of development plan policy and the current intentions of the Boroughs. As background it reports the local aspirations from various community involvement exercises for cleaner, safer streets, jobs, homes, shopping and leisure facilities (para 1.5.3). Camden's Neighbourhood Renewal Strategy (2002) is said to have identified a local perception of a lack of local modern convenience shops (para 2.5.1). Retail, tourist, leisure and entertainment functions are recognised as being appropriate at King's Cross, as they are in the rest of Central London, contributing to its vitality and viability, to its range of employment and business opportunities, and its regenerative potential (para 2.1.4).
- 2.6.2 The Brief seeks a wide range of such facilities appropriate to the scale and mix of development and its location and particular metropolitan significance. Retail development is envisaged as encompassing a range of convenience, comparison, service and food and drink uses which address the needs of the new resident, working and visiting population, and also the gaps in provision for surrounding communities (para 2.2.4). It warns that major car-reliant retail development would not be appropriate.
- 2.6.3 Explicit reasons given for supporting retail, leisure and entertainment



including commercial leisure, are that (para 2.5.2):

- *New development should meet its needs for shopping, conveniently located for the whole development area and nearby communities, providing in particular varied retail activities appropriately located across the Area and the Triangle, allowing residents, visitors and workers easy access to a range of shops and local services and contributing to a vibrant and rich streetscape;*
- *They are important supporting elements in the Area's varied role within Central London, recognised as a 'new quarter for London' (RPG3) and as an Opportunity Area in the Central Activities Zone in the Draft London Plan; They offer an appropriate, and potentially beneficial, alternative uses for a number of the heritage buildings, securing their future in a way that is likely to involve less extensive physical interventions than some other uses;*
- *Key gaps in local retail provision can make it difficult for local communities to have easy access to a range of competitive goods and services*
- *These uses can generate positive values which help deliver the mix of uses, high quality development and regeneration benefits called for in this Brief;*
- *The sharing of leisure, retail and cultural facilities can provide economic and social integration with a wider area;*
- *Shopping, entertainment and other uses can create lively, safer streets in a mixed use development, increase the range of job opportunities and attract people from the surrounding area to support cultural events.*

2.6.4 In terms of locational guidance, the Brief seeks varied retail activities appropriately located across the Main Site area and the Triangle so as to be conveniently located for the whole development area and nearby communities (para 2.5.2). In relation to the Triangle, the Brief seeks mixed use development with a preference for housing, with retail and other uses to enliven the street frontages. The lack of outlook at lower levels is said to suggest that this is an appropriate location for retailing and/or public leisure, incorporating a wide range of indoor and outdoor sports activities (page 76).

2.6.5 The Brief requires the applications to be supported by a Retail Impact Assessment (para 4.1.13). For proposals more than 2500 square metres this needs to provide a full assessment of the likely impact on the vitality and viability of centres in Camden, Islington and other neighbouring boroughs, taking full account of other permitted and proposed shopping floorspace.

## 2.7 Conclusion

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2.7.1 This Retail Impact Assessment assesses the scale and mix of retail and commercial leisure uses proposed at King's Cross Central to determine their likely impact on the viability and vitality of neighbouring centres.

2.7.2 The assessment scope and methodology reflects local, regional and national planning policies, including Camden UDP Policy KC1 and the adopted and emerging national guidance in PPG6 and draft PPS6. The assessment also meets the requirements of the Boroughs' site-specific Planning and Development Brief.





## **Appendix 8**

Analysis of the Applicants' Urban Design Strategy Against the Joint Camden and Islington Planning and Development Brief

## Comparison of Applicants' Urban Design Strategy with the Joint Camden and Islington Brief

Sub Area 1 - development should:	
<p>Preserve or create appropriate settings for the Grade 1 listed buildings and not compromise their distinctive appearance, skyline and massing;</p>	<p><b>UDS 2.5:</b> The existing buildings and places, many of which are still intact are our starting point for the new development. By embedding new buildings amongst old, the character and life of each can be shared and the human benefit multiplied.</p> <p><b>UDG Station Square 2.2:</b> St Pancras is Gothic, King's Cross is classical; both are massive and bold.</p> <p>They are statement buildings and their rhetoric should be allowed to influence the new buildings which contribute to their new setting, for example by robust detailing, strong linear rhythms and scale.</p>
<p>Retain and restore with appropriate uses the Great Northern Hotel. The removal of additions could improve the character of the main building if undertaken sensitively. The restoration and reuse should address the need to optimise pedestrian movement at the interchange.</p>	<p>The proposals retain the Great Northern Hotel and a listed building application has been submitted for the demolition of the additions, to optimise pedestrian (and other) movement at the interchange.</p> <p>The Initial Conservation Plan examines how pedestrian movement could be optimised alongside the King's Cross Station Enhancement proposals.</p> <p><b>UDS 4.1:</b> A public route would be created around the edge of the concourse, and a new arcade at the base of the Great Northern Hotel; together forming a new gateway from Euston road into King's Cross Central.</p>
<p>Provide for the early replacement of the of the 1970s concourse to the front of King's Cross Station with a new western concourse</p>	<p>The area for the King's Cross Station Enhancement is shown on the Parameter Plans and included within the Main Site Development Specification.</p> <p><b>UDS 4.1:</b> The (Station) Square.....could form the site for the new western concourse, being considered by Network Rail. This would make possible the removal of the existing concourse on the Euston Road.</p> <p><b>UDG Station Square 3:</b> a line of trees will define the future eastern edge of Station Square until proposals for the new concourse for King's Cross are brought forward. Until then, the area for the new concourse will form a 'forecourt' to the Station and the major pedestrian link to Euston Road.</p>
<p>Create strong visual and pedestrian connections from the Euston Road northwards into the king's Cross Central site and correspondingly from this</p>	<p><b>UDS 3.2:</b> Two emerging places within the site – stations square and the Goods yard at the centre – hold the key to giving King's Cross Central accessibility, a unique sense of place and a focus.</p> <p>What will become Station Square is at present a</p>

<p>development southwards to the Euston Road.</p>	<p>fragmented and confusing place, in need of restructuring.....</p> <p>...our vision is not complete without good pedestrian connections back to the Euston Road and beyond into Bloomsbury and Midtown.</p> <p>By creating a map of physical and visual connections, people's new mental map of the area would be reinforced.</p>
<p>Create the highest quality of new public realm around the interchange, forming a high quality setting for the listed stations, connecting the new spaces north and south of the Great Northern Hotel and relating successfully to Euston Road, Pancras Road and essential support facilities such as for buses and taxis. This space should allow for free pedestrian flows, be mainly hard landscaped and use durable attractive materials that can withstand heavy and continuous public use.</p>	<p>Details of the Landscaping Components can be found in the Landscape Proposals Plans.</p> <p><b>PRS 3.2 Station Square:</b> Thousands of people would arrive at, or cross, Station Square every day and it would form the first impression for many, heralding arrival at King's Cross Central. It would be the hub between the two enhanced stations and, as such, would have huge prominence in the hierarchy of new open spaces. The key pedestrian movements would be from people arriving by bus or taxi, from Euston Road or the Boulevard, entering from the stations or crossing between them and people emerging from the underground station. Given the hustle and bustle of people walking into the square, the space would be open and designed to allow unhindered pedestrian movement.</p> <p>The square would be paved in high quality stone to form a carpet that unifies the space between the stations and the German Gym. While contributing to the character of the space the stone paving would also be robust enough to withstand years of continuous use.</p>
<p>Undertake Highway changes that blend essential transport and movement with high quality urban design, nor compromise the scale and quality of the new spaces.</p>	<p><b>UDS 4.1:</b> Our proposals include moving Pancras Road which would otherwise cut through the middle of Station Square. All surfaces except the main carriageways are to be treated in ... stone finishes to make them feel part of a coherent public realm. The taxi canopies and the German Gym and Stanley buildings would provide buffers between most of the square and the road.</p>
<p>Develop a clear strategy to address the phasing of major transport improvements ensuring that temporary designs and treatments are put in place which meet the same high standard, particularly in relation to the listed buildings and for public movement and quality and safety of the public realm.</p>	<p>Details of the Landscaping Components can be found in the Landscape Proposals Plans.</p> <p><b>UDG Station Square 3:</b> a line of trees will define the future eastern edge of Station Square until proposals for the new concourse for King's Cross are brought forward. Until then, the area for the new concourse will form a 'forecourt' to the Station and the major pedestrian link to Euston Road.</p> <p>UDG Station square 4.1: Without the new western concourse in place, the site (of the new concourse)</p>

safety of the public realm.	would be both part of Station square and a discrete space. It forms an 'anteroom' to Station Square and would be landscaped with paving benches and trees.
<b>Sub Area 2 - development should:</b>	
<p>Preserve or create appropriate settings for the grade 1 listed buildings. Building height and massing near the listed buildings will have the challenge of providing appropriate backdrops and transitions in scale, in order to help create good settings. The critical composition is the panorama of the grade 1 listed buildings from the south. This is likely to mean a similar height close to the stations, except alongside the new St Pancras canopy and north of the King's Cross train shed.</p>	<p>Maximum heights and massing parameters are given in the Parameter Plans that form part of the Main Site Development Specification.</p> <p><b>UDG – Station Square 4.1:</b> Two Layers of space – the inner enclosure of station square is created by the faces of the German Gym, the Great Northern Hotel and the southern tip of development zone A. The outer layer of enclosure would be formed by the façade of King's Cross Station to the east, the side elevation of St Pancras Station to the west, the set-back elevation of the southern part of development zone A and the new buildings of Zone B beyond the German Gym to the North.</p> <p><b>UDG Station square 4.2:</b> The new buildings along the northern edge of the square will form the urban front of King's Cross central; a gateway to the new development. The identity and presence of this front will be significant in establishing a sound base for the regeneration through and around the site. The vast scale and boldness of their thrust towards the Euston Road sets the tone of this space and it is in this spirit of confidence that a new edge to the north should be created.</p>
<p>Preserve or create appropriate settings for the other heritage buildings within this area and those of the Granary Complex to the north and ensure development close to the canal and CSNP does not harm their essential character, setting or enjoyment.</p>	<p><b>PRS 3.2 Regent's Canal:</b> The Regent's Canal would bisect King's Cross Central, forming an important and integral part of the development. The proposals aim to balance the existing enclosed and secretive nature of the canal with the objective of improving its safety and accessibility.</p> <p><b>UDS 4.6:</b> On looking around, we see the sheer front of the Granary rising up on the right answered by the line of large new buildings on Goods Way.....It is a large space but at the same time it has a comprehensible scale due to the substantial strength of its edges.</p> <p><b>UDG Goods Way and Canal Square 4.3:</b> Each building along Goods Way has a distinct setting and this should be reflected in their individuality. However, they must also work as a unified backdrop to the Goods yard and Granary Square.</p>
<p>Provide a legible approach between the main interchange to the south</p>	<p>The Principal Public Realm, building heights and massing parameters are set out in the Parameter Plans in the Development Specifications. Landscaping</p>

<p>and all parts of the new development. A strong north-south route needs significant width and building height to provide a scale appropriate to its vital role as the main visual and movement route connecting the overall development area. The high footfall is likely to mean quite formal hard landscaping, using planting extensively to help to define secondary routes and soften places where people might pause.</p>	<p>components and materials are described in the Landscape Proposals Plans in Annex D of the Main Site Development Specification.</p> <p><b>UDS 3.2:</b> From Station Square, two new spaces, the Boulevard and Pancras Square, with a dominant north-south grain, connect to the Goods Yard. Of these two, the Boulevard (which includes a public transport route) would meet the direct desire line, with a long view up to the great space at the heart of the site.</p> <p><b>PRS 3.2 Boulevard:</b> Conceptually bold in alignment, length, and tapering breadth, the Boulevard would be the primary route linking the stations and Station Square to Granary Square and the northern parts of the site. .... Paved in high quality stone paving and lined on the eastern and north western side with large semi-mature trees, the Boulevard would be a predominantly pedestrian realm encouraging inclusive use, exploration, and enjoyment by all.</p> <p><b>UDS 4.3:</b> Pancras Square has a strong daily rhythm. In the middle of the day it is calm and quiet....in the morning, however, there is a tide of commuters flowing northwards around the edges of the square, many of the coming from the Underground entrance....In the evening the tide ebbs south.</p>
<p>Create streets of varied character and form maintaining a human scale in the balance of street width and building height..... detailed design of the public realm must have regard to the needs of sophisticated urban management, particularly in areas of concentration of night-time activities.</p>	<p>Street hierarchy is set out in Parameter Plan KXC007. Minimum dimensions and functions are described in Annex C of the Main Site Development Specification.</p> <p>A discussion of different approaches to the management and maintenance of the public realm is given in Sections 4 and 5 of the Public Realm Strategy.</p> <p><b>UDS 3.4:</b> learning from the urban grain of Clerkenwell, Fitzrovia and other coherent parts of London, at King's Cross central, the mega-blocks, bounded by primary routes, would be broken down into city blocks by a series of secondary streets and then into individual buildings by side streets and passages. This approach offers a familiar 'grain' of plot division and frequency of public routes, a human scale which is an essential part of a 'Human City'.</p> <p><b>UDS 3.6:</b> Within the site a network of roads would be constructed, linking to Pancras Road, York Way and Goods Way. Here and elsewhere a high level of management and maintenance would be required to achieve the standards expected from a high quality public realm that is open to all, day and night. This is seen as essential to achieving a natural and accessible environment.</p>



	<p><b>UDS 3.9:</b> In some places short sections of secondary street would intentionally be made as narrow as possible. In these areas, the increased density would be beneficial to the coherence of the urban grain, rather than detrimental.</p>
<p>Create variety as part of high density and mixed use development with higher building carefully located in relation to sensitive buildings, spaces and uses. Higher buildings may be appropriate alongside the East Coast Mainline tracks and the St Pancras Station extension, and inwards across the central part of this area, outside the strategic view and subject to wider guidance and the design criteria in this brief. Greater building height maybe achievable in places, through formal setting back, but providing natural daylight to interiors and integrally designed rooftop plant rooms (where unavoidable) will constrain the additional volume.</p>	<p>Maximum heights are defined in the Parameter Plans in the Main Site Development Specification.</p> <p><b>UDS 3.9:</b> The guidelines address the use of setbacks at the upper parts of buildings. This is to promote both good levels of daylighting at street level and diverse skylines.</p> <p>A traditional light cone... is used to guide development such that all spaces are sufficiently light. Thus narrow or taller spaces would require more setbacks than wider ones and conversely, where buildings front onto major spaces, no setbacks are required.</p> <p>A number of ... exceptions to general guidance are allowed in order to make site specific responses possible and to avoid the homogenising effect which setback rules could have if applied uniformly.</p> <p>Although there are a number of opportunities to consider tall buildings at gaps between the Strategic View Corridors, the submitted proposals do not contemplate any buildings over 84.0m AOD (les than 60m tall). Nevertheless, they offer scope for marker buildings on (a number of) plots</p> <p><b>UDG Boulevard 11:</b> Diversity at roof level would be encouraged to give human scale and visual interest.</p>
<p>Consider the relocation of the gas governor to a less prominent position, recognising the considerable technical constraints.</p>	<p>A zone for the potential relocation of the gas governor is identified in the Main Site Development Specification and is shown on the Parameter Plans.</p> <p><b>UDG Goods Way 4.3:</b> The site for the relocated gas Governor provides an opportunity to create a positive edge, for example a wall of greenery or a piece of public art.</p>
<p>3.3.10 the culross building may stand across the possible alignment of this key route and across important potential north-south views.....Proposals involving their substantial alteration or removal must be supported by the comprehensive masterplan approach, particularly PPG15, .... And must fully</p>	<p>A listed building application has been submitted for the removal of the Culross Buildings, with a supporting statement.</p> <p><b>UDS 3.2:</b> we have tried numerous layouts for the South Area with the Culross Buildings retained. None of them work. For example, none of them achieve the simple clear connections which are needed to encourage life to flow into the Goods Yard and the North Area.</p>

<p>demonstrate the specific benefits justifying the proposed outcomes for the Culross buildings.</p>	
<p>The relocation, restoration and beneficial reuse of the of the Gasholder triplet and gasholder No. 8 should be achieved as part of the development and the council will seek to achieve this in an early phase..... A location close to the canal may be the most appropriate and retain historic connections.</p>	<p>The Main Site Development Specification includes the re-erection of the Triplet Gasholder guide frames and the dismantling and re-erection of Gasholder No. 8 guide frame on the northern canal bank. A Zone (Zone N) for the re-erected frames is shown in the Main Site Parameter Plans.</p>
<p>The remaining part of the Stanley Buildings is listed Grade II..... Proposals involving their substantial alteration or removal must be supported by the comprehensive masterplan approach, particularly PPG15, .... And must fully demonstrate the specific benefits justifying the proposed outcomes for the Stanley buildings.</p>	<p>A listed building application has been submitted for the removal of the northern Stanley Building, with a supporting statement. Annex E to the Main Site Development Specification sets out refurbishment proposals for the southern (retained) Stanley Building.</p> <p><b>UDS 4.1:</b> Our proposals include moving Pancras Road which would otherwise cut through the middle of Station Square. This is why we are proposing the removal of the Northern Stanley Building.</p> <p>The creation of Station Square at the gateway to King's Cross Central is key to achieving the regeneration objectives for the area.</p>
<p>The German Gymnasium should be restored and beneficial new use achieved. Proposals should be supported by the comprehensive masterplan approach, particularly PPG15, .... and must fully demonstrate the specific benefits justifying the proposed outcomes for the German Gymnasium. Re-use will probably require new opening and other interventions to integrate them with the new main entrance to St Pancras and the new development...</p>	<p>Works to facilitate future uses and the parameters within which they would be carried out are included within Annex E of the Development Specification.</p> <p><b>UDG Station Square 3:</b> Other than the coming and going of people to and from trains, underground, buses and taxis, the main activity of the square would be concentrated on the north end where the German Gym, Clarence passage and the (Southern) Stanley Building cluster amongst new urban blocks, sheltered from the road. Here the ground floor frontages would encourage spill out onto sunny paved spaces with routes into Pancras Square and the Boulevard.</p>
<p>For development near the canal, it is very important to protect the character and amenities of the waterway</p>	<p>Maximum building heights are given in the Main Site Development Specification.</p> <p><b>PRS 3.2 Regent's Canal:</b> The Regent's Canal would</p>

<p>and Camley Street Natural park. In particular, building heights and spacing abutting or setback from the southside of Goods Way need to allow satisfactory daylight and sunlight to reach the canal edges.</p>	<p>bisect King's Cross Central, forming an important and integral part of the development. The proposals aim to balance the existing enclosed and secretive nature of the canal with the objective of improving its safety and accessibility.</p> <p><b>UDS 4.5:</b> The strength and scale of Goods Way Frontage is significant in giving a sense of enclosure to the Goods yard as a whole. While we wanted it to be on a grand scale, in proportion to the scale of the Goods Yard, (of which the canal is part) we also wanted it to be perforate to allow views and routes to and from the South. In order to break up the scale of the frontage without losing its strength, we have allowed the central building to twist towards the Granary, ensuring a broken and diverse skyline. Sheer walls on the canal edge are one of its most typical characteristics. Our aim is to achieve a balance between smaller buildings on the waters edge (for example the new marker building on Goods Way or the Fish and Coal Building) and large buildings set back some distance. Together these would combine to create strong edges to the canal foreground and background.</p> <p><b>UDG Goods Yard 7:</b> Due to its open aspect, the goods Yard would enjoy good sunlight throughout the day, all year round.</p> <p><b>UDG Goods Way 7:</b> Due to the Northwest orientation of the frontage, Goods way would be sunny from 3pm in the Summer. The whole length of Goods way would enjoy sunshine until Sunset in Mid June.</p>
<p>Although Goods Way provides some distancing of the new development from the canal, this road hinders a direct beneficial relationship between the development and the waterway. New bridges have a particularly important link role, and maintaining reasonable scale on the south side is considered necessary. There are two small but significant plots at the junction of York Way.....</p>	<p><b>PRS 3.2 Goods way and Canal Square:</b> (Goods Way) would run alongside the canal for much of its length, and half way along, open up into Canal Square, a large plaza that would spatially form a southern annexe to Granary Square, with views across the canal to the Coal Drops and the Granary. This space would be predominantly orientated towards pedestrians and in particular those walking up from Pancras Square and the Boulevard to meet the bridges that would cross the canal</p> <p><b>UDS 3.2:</b> ...a pedestrian priority crossing (at Goods Way) and two new bridges over the canal would interlock with Granary Square.</p> <p><b>UDG Goods way 4.3:</b> The island site, Zone F, would play an important part in the enclosure of Goods Way. The building should be treated as an object building within the space of Granary Square / York Way.</p>
<p>A finer grain street pattern is sought between the main</p>	<p>Access and Circulation within the site is defined on parameter plan KXC007.</p>

<p>north-south axis and Pancras Road avoiding overshadowed precinct spaces and creating intimacy, permeability, views and a human scale.</p>	<p><b>UDS 3.3:</b> Woven amongst the major spaces, a network of secondary spaces and street within the development blocks would provide a full hierarchy of open space from large to small, public to private.</p>
<p>All streets should in principle have active frontages, increasing their attraction and security as routes. The public realm can be considered as beginning well within ground floors and active uses at ground level should relate to the human scale and create vitality and interest.</p>	<p>Ground floor and upper floor uses are set out in the Parameter Plans.</p> <p><b>UDS 3.6:</b> The central objective here would be to blur the boundaries between public and private realms at ground floor level, in order to allow the density and intensity of activity generated at King's Cross central to flourish.</p> <p><b>UDS 3.4:</b> learning from the urban grain of Clerkenwell, Fitzrovia and other coherent parts of London, at King's Cross central, the mega-blocks, bounded by primary routes, would be broken down into city blocks by a series of secondary streets and then into individual buildings by side streets and passages. This approach offers a familiar 'grain' of plot division and frequency of public routes, a human scale which is an essential part of a 'Human City'.</p>
<p>Particular attention should be paid to potentially secondary areas like Pancras Road, which at the Goods way junction is a major crossroads and should be treated as an attractive gateway into the new development. The physical and movement link under the CTRL/MML bridge is a strong one and designs should embrace the entire public realm at this place with active street frontages, high quality elevations and landscaping.</p>	<p><b>UDS 4.4:</b> Although Pancras Road is a busy road, the surfaces (would be) well thought through to ensure that certain lanes – taxi queues, through lanes and public transport routes etc. – are well managed, reducing the dominance of the vehicular road surface. This helps the visitor to appreciate Pancras Road as a normal, if busy, London street.</p> <p>It is at each end, however, that Pancras Road is most interesting. At its north end there is an extraordinary crossroads where the road below the railway meets the slope of Goods Way....the lighting scheme and increased people numbers makes this relatively quiet part of the street feel very safe.</p> <p>Street level activity (will) increase on the west side with a food store and the domestic entrance to St Pancras Station. This is well placed opposite Clarence Passage....which (would be) a...landscaped space with entrances and benches.</p>
<p><b>Sub Area 3 - development should:</b></p>	
<p>Continue to provide and create views and sightlines to, from and along the canal;</p>	<p>The UDS illustrates a number of retained and new views along the Canal (for example see Section 4.7).</p> <p><b>PRS 3.2 Regent's Canal:</b> Specific locations have been selected where it would be appropriate to open up selected views to and across the canal along both</p>

	its northern side and along Goods Way and enhance its presence within the scheme, reasserting its historic importance.
Improve community safety for pedestrians, cyclists and other users with better lighting, suitable surface materials and the application of integrated safety design principles;	<p><b>PRS 3.2 Regent's Canal:</b> It would be accessible at the lower level along the original towpath on the northern side. A number of located steps and ramps would be located to encourage people to explore the canal and experience closer contact with the boats, locks, basins, and wildlife.</p> <p><b>PRS 3.2 Regent's Canal:</b> The Regent's Canal would bisect King's Cross Central, forming an important and integral part of the development. The proposals aim to balance the existing enclosed and secretive nature of the canal with the objective of improving its safety and accessibility.</p>
Achieve a balance between opening up access and improving pedestrian and cycle links and respecting the Canal's sense of enclosure, 'hidden character' by retaining areas of tranquillity;	<b>UDS 3.6:</b> As well as being a significant connector, the Canal is a major recreational asset and an important natural habitat. Much of its present character would be retained but a new level of activity would be made possible by the introduction of good connections to Granary Square, the Coal Drops Yard, and the Gasholders.
Respect and enhance the waterway in terms of massing, scale, materials, traditional Canal vernacular and historic context;	<b>UDS 4.5:</b> The strength and scale of Goods Way Frontage is significant in giving a sense of enclosure to the Goods yard as a whole. While we wanted it to be on a grand scale, in proportion to the scale of the Goods Yard, (of which the canal is part) we also wanted it to be perforate to allow views and routes to and from the South. In order to break up the scale of the frontage without losing its strength, we have allowed the central building to twist towards the Granary, ensuring a broken and diverse skyline. Sheer walls on the canal edge are one of its most typical characteristics. Our aim is to achieve a balance between smaller buildings on the waters edge (for example the new marker building on Goods Way or the Fish and Coal Building) and large buildings set back some distance. Together these would combine to create strong edges to the canal foreground and background.
Retain specific historic features along the canal; consideration should be given to re-opening one or both north bank basins	<b>UDS 4.6:</b> we looked at many ways of recreating the (the granary basin). There were two main reasons why we chose not to: Firstly, we want Granary Square to be a space for people. We want to hold public events there or install temporary attractions such as a skating rink. The level of the water would have been more than 3m below the square and would have created a void in its centre; secondly, a major national

	<p>grid cable runs in the towpath and it would not be viable to move it. Boats would have to be craned in and out.</p> <p><b>UDS 3.3:</b> We also looked at recreating the stone and Coal Basin on the west side of the Western Coal Drops. After careful analysis we concluded that a basin and the gasholders would be mutually exclusive. We believe the gasholders offer the greater public benefit.</p>
<p>Address biodiversity and ecology issues outlined in section 3 of this Brief and wider guidance and plans;</p>	<p>Biodiversity and ecology issues are addressed in detail in the Environmental Statement.</p>
<p>On the north bank, retain and renew the towpath, and stabilise the existing old walls; open arches through to the interior public spaces; and create accessible public access down to towpath level by the CTRL/Midland Mainline (MML) bridge, and along some of the length between the existing concrete bridge and the Maiden Lane bridge (York Way);</p>	<p>Parameter Plan KXC006 defines and describes a series of proposed landscaping, towpath improvement, lighting and other works, along the Regent's Canal. For example, the parameter plan indicates a new route between the lower level of the Coal Drops and the Canal towpath. This would be formed by opening up between 1 and 3 of the arches beneath the Wharf Road Viaduct.</p> <p><b>PRS 3.2 Gasholders:</b> The 'Triplet' would be located at the top of three terrace levels formed between sinuous flights of steps. The steps and terraces would appear to swirl around the base of the Gasholders offering places for people to sit and watch the activity along the canal.....Terraces would step down to the canal and it would be here that the canal becomes part of the heart of King's Cross Central.... Continuing eastward the path would continue past a new pavilion and become tree-lined. A choice would be offered of following the canal to York Way at the upper level; or descending a gradual ramp down to the towpath and the widening in the waterway.</p>
<p>On the southern bank (east end), consider developing a "stepped" environment from waterway to reeds/planting an across a walkway linking to the Goods Way pavement, exploiting converging levels and alignment. There are two potential sites for small buildings offering canalside views and activities: on the site of the existing filling station and east of CSNP. It is important to retain soft bank areas and improve habitat around these,</p>	<p>Development Zones and ground floor and upper level uses are defined in the Main Site Development Specification.</p> <p><b>UDG Goods Way 4.3:</b> The island site, Zone F, would play an important part in the enclosure of Goods Way. The building should be treated as an object building within the space of Granary Square / York Way....</p> <p>The site for the relocated gas Governor provides an opportunity to create a positive edge, for example a wall of greenery or a piece of public art.</p> <p><b>UDS 4.7 (illustrative Scheme):</b> Starting from York Way, we look down on a broad stretch of water with residential moorings on the southside. The corner marker building on the southside has a restaurant with views out over the water</p>

<p>allowing natural habitat growth on residual land;</p>	<p>views out over the water</p>
<p>Provide public artwork and interpretation points along the Canal;</p>	<p><b>PRS 3.4:</b> As an overarching narrative, play and art would permeate the whole site and would create connections with surrounding areas through incidental play opportunities. To achieve this, activities would be allocated throughout the public realm to encourage people to interact and linger in spaces at any time of the day or the year. This would require a dedicated programme of facilities and events that address different user groups. Play and art would be integral to the urban landscape and further define the public realm</p>
<p>Create appropriate enhancement and canalside development to meet the UDP and other guidance within this Brief. For example, improved connections with the canal are important to the viability and sustainability of development in the northern areas, and positive engagement blends waterside access with existing and new development without compromising the Canal's character or creating a cliff-like frontage;</p>	<p><b>PRS 3.2 Regent's Canal:</b> The Regent's Canal would bisect King's Cross Central, forming an important and integral part of the development. The proposals aim to balance the existing enclosed and secretive nature of the canal with the objective of improving its safety and accessibility.</p> <p><b>UDG Goods Yard 4.2</b> The Bridgehead Pavilion should form an integrated design with East Bridge, incorporating steps and a lift down to the Canal....It should form a link rather than a barrier to the Canal.</p>
<p>Where practicable, works to the Canal ground surface and walls should retain and enhance the particular Canal vernacular by using traditional materials such as bricks, stone sets and flags, and avoid appearing as a formal public highway;</p>	<p>Parameter Plan KXC006 defines and describes a series of proposed landscaping, towpath improvement, lighting and other works, along the Regent's Canal.</p> <p>The Landscape Proposals Plans define the standard of the materials palette to be used within the scheme.</p>
<p>Locating the gasholder frames by the water would be a positive expression of the development, combined with the renovation of the Coal and Fish Offices, new bridges and new direct access to a renovated towpath.</p>	<p>Development Zones are shown in the Parameter Plans. These show the Guideframes for the Triplet and No.8 relocated to the northern edge of the canal and indicate locations for new bridges.</p> <p>Works to facilitate future uses for the Fish and Coal building are described in the Main Site Development Specification Annex E.</p>

<p>On the north bank of the canal, the objective is the sensitive restoration and re-use of this group of heritage buildings, where possible and appropriate and compatible with the other objectives of the Brief.</p>	<p>Works to facilitate future uses for the Fish and Coal, Granary Complex, Coal Drops building, Regeneration House, Midland Goods shed and Handyside canopies are described in the Main Site Development Specification Annex E.</p>
<p>Development of the Granary will need particular care. The buildings and structures attached to the Granary (the “Granary complex”) are within its listed cartilage. Therefore, listed building controls apply and any alterations should respect the special character and setting of the Granary. These buildings and possible alterations include:</p>	<p>Works to facilitate future uses for the Fish and Coal, Granary Complex, Coal Drops building, Regeneration House, Midland Goods shed and Handyside canopies are described in the Main Site Development Specification Annex E.</p>
<ul style="list-style-type: none"> <li>• The Midland Goods Sheds. As greater access is likely to be required to create a west-east route, the arches could be opened up. As the sheds provide a considerable floor space, they are very adaptable for a multitude of uses and activities;</li> </ul>	<p>Works to facilitate future uses are described in Annex E to the Main Site Development Specification.</p>
<ul style="list-style-type: none"> <li>• The Potato Market East Roof is the roof to the east of the Midlands goods sheds and the most easterly of the structures. It has therefore an important townscape role. It is set on a curve, thus giving an attractive perspective like York mainline station. It has particular historic importance as this alignment and some spandrel beams are from the 1850 Maiden Lane temporary passenger station, which</li> </ul>	<p>Works to facilitate future uses are described in Annex E to the Main Site Development Specification.</p>



<p>was used by visitors to the Great Exhibition. For these reasons, it should be retained and enhanced;</p>	
<ul style="list-style-type: none"> <li>• The Handyside Link Canopy has a clear span between the flanking Eastern Transit and Midland Sheds. This open span allows a high degree of covered permeability;</li> </ul>	<p>Works to facilitate future uses are described in Annex E to the Main Site Development Specification.</p>
<ul style="list-style-type: none"> <li>• Regeneration House was the former main offices of the Goods Yard. It is capable of a wide range of uses;</li> </ul>	<p>Works to facilitate future uses are described in Annex E to the Main Site Development Specification.</p>
<ul style="list-style-type: none"> <li>• The Train Assembly shed and the West and East Transit Sheds behind the Granary invite new uses, including a west-east axis. Alternatively this area may be capable of new development. New development should reflect the linear plan form of the existing structure and not project above the roof of the Granary;</li> </ul>	<p>The Main Site Development Specification proposes to demolish the Assembly Shed and develop new buildings and land uses within its footprint. Parameter Plan KXC014 sets maximum building heights within the Assembly Shed footprint at +50.0m AOD.</p>
<ul style="list-style-type: none"> <li>• The Western Coal Drops are capable of re-use with the introduction of sensitive openings;</li> </ul>	<p>Works to facilitate future uses are described in Annex E to the Main Site Development Specification.</p>
<ul style="list-style-type: none"> <li>• The Eastern Coal Drops would greatly benefit from the reinstatement of the west and east elevations to nearer their original form, with the ground floor arches being opened up;</li> </ul>	<p>Works to facilitate future uses are described in Annex E to the Main Site Development Specification.</p>
<p>The Western Goods Shed (1897-1899) is a substantial, later structure, which could be subdivided.</p>	<p>A conservation area consent application has been submitted for the removal/demolition of the Western Goods Shed, to allow the Gasholder guide frames to be re-erected, as a group, north of the Canal.</p>

<p>Increased access across the site could be achieved by opening up bays across the building.</p>	
<p>The Plimsoll Viaduct may inhibit permeability within the site and successful re-use of the Coal Drop buildings;</p>	<p>A conservation area consent application has been submitted for the demolition of the plimsoll viaduct, to enable the refurbishment of the Coal Drops for a range of new uses.</p>
<p>The stable arches under the Canal Viaduct carrying Wharf Road: may be opened up to provide canalside access and house new uses. The pattern of openings in these arches is quite important, possibly best grouped in twos or threes at each end, to provide views through and increase security;</p>	<p>Works to facilitate future uses are described in Annex E to the Main Site Development Specification.</p>
<p>The Coal and Fish offices are set on a curve, following the bend of the Canal and form a strong relationship with the Granary, the Canal and to the Eastern Coal Drop. The stepping height is a strong feature to be retained.</p>	<p>Works to facilitate future uses are described in Annex E to the Main Site Development Specification.</p>
<p>The large area in front of the Granary has great potential as a major open space. It has several potential functions: creating a new setting for the Granary and other related buildings, providing a new focus of activity animating the northern side of the Canal, accommodating substantial pedestrian flows in all directions, allowing views to the south, providing a focus for specific open air activity to create a distinctive space and a destination in the northern part of the site.</p>	<p><b>UDS 3.3:</b> The Goods yard, with Granary square at its centre would be at the heart of the public realm....it was and would be again, a hive of activity, a market place, a place of business, competition and enterprise at the confluence of transport routes.</p> <p><b>PRS 3.2</b> Granary Square: Granary Square would be at the geographic heart, and heritage soul of King's Cross Central, and as such, be a hub for the King's Cross and neighbouring communities. It would be embraced by the noteworthy Fish and Coal, Eastern Coal Drop, and imposing Granary buildings. Within the fabric of the stone paving would be artefacts; fragments from a bygone age recalling a further glimpse into the square's past uses and activity. It would be in this vane that the square's works of art would be conceived, specially commissioned for their specific location, and of a scale to compliment the adjacent buildings and space in which they would be placed.</p>

<p>A successful scheme for this space may involve introducing some buildings or structures to help define and shape this space, altering its scale, adding intimacy and relating more positively to the Granary and other heritage buildings. The scope of views of the Granary setting needs careful consideration.</p>	<p>The Development Specification provides for new pavilion buildings within Granary Square (development zones G and H). .</p> <p>Views of the Granary are addressed in the Environmental Statement.</p> <p><b>UDG Goods Yard 4.2:</b> the bridge head pavilion and the Provender store pavilion should give secondary enclosure to Granary Square...They should be designed in the spirit of the Goods Yard; its confidence, pragmatism and modernity.</p>
<p>The creation of attractive public spaces and through movement particularly east-west movement above the level of the canal and keeping and creating new views, and exploiting the various level changes.</p>	<p><b>UDS 3.2:</b> The Canal is the primary connector at both upper and lower levels to east and west. To the west, the towpath to Camden would connect to the upper level of the Goods Yard via the public space around the gasholders.....eastwards, the towpath would be linked to Wharf Road via steps and ramps. These measures would strengthen the connections and a sense of welcome to York way and south Islington.</p> <p><b>PRS 3.2 Canal Corridor:</b> Terraces would step down to the canal and it would be here that the canal becomes part of the heart of King's Cross Central. Fantastic views of the canal would be found from the two bridges. Continuing eastward the path would continue past a new pavilion and become tree-lined. A choice would be offered of following the canal to York Way at the upper level; or descending a gradual ramp down to the towpath and the widening in the waterway.</p>
<p>There are two principal locations where new bridges are likely to be needed across the Canal:</p> <p>1. A central link between the areas of the development north and south of the canal. This link will ensure in particular that the development north of the canal realises its full regenerative potential and that residents and other occupiers of the buildings in this northern area have good access to the range of facilities in the southern part. This crossing should replace the existing concrete bridge, lying to the east of the Fish and Coal</p>	<p>Access and Circulation proposals (including new bridges) are shown on Parameter Plan KXC007 in the Main Site Development Specification.</p> <p><b>UDS 3.2:</b> From Station Square, two new spaces (would)...connect to the Goods Yard. The Boulevard (which includes a public transport route) would meet a direct desire line, with a long view up to the great space at the heart of the site. By contrast, Pancras Square would be more gradually revealed, part of a second alternate link to the Goods Yard offering pedestrians a route with a different character and experience. Both routes come back together at Canal Square. Here, a pedestrian crossing and two new bridges over the canal would interlock with Granary Square, ensuring the canal would no longer be a barrier.</p> <p><b>UDS 3.2:</b> A new footbridge over the canal and across Camley Street Natural Park would connect westwards towards Camden Town.</p>

<p>Offices and be built to adoptable standards capable of use by for all traffic; and</p> <p>2. A lighter weight scan predominately or exclusively for walkers and cyclists near the St Pancras Lock. This could also provide a link in a connection from St Pancras Gardens across the development to Bingfield Park.</p>	
<p>The design of new bridges across the Canal should be appropriate to the context, be of very high quality, and well connected to routes through the wider development. An architectural design competition may be appropriate.</p>	<p>Access and Circulation proposals (including new bridges) are shown on Parameter Plan KXC007 in the Main Site Development Specification.</p> <p><b>UDG Goods way 4.3:</b> The two bridges combined with the presence of the canal would give some definition to Goods Way. The road bridge forms a continuous ground surface linking Canal Square to Granary Square. Three dimensionally it is part of a single composition with the bridgehead pavilion. The footbridge has a sculptural quality which acts a focus between the two spaces.</p>
<p><b>Sub Area 4 – Towards the CTRL Embankment</b></p>	
<p>This area should include a broad mix of uses, and a variety of open spaces and building forms.</p>	<p>Proposed uses at ground floor and upper levels are defined in the Parameter Plans. These confirm the mixed use character of the development.</p> <p><b>UDS 3.5:</b> The north would be larger and distinct from the South. Its central space, long Park, would connect laterally and at its top end to York Way.....Every main street would have a mix of residential, office and other uses along it and would be active day and night.</p> <p><b>UDS 3.1:</b> the north area would be characterised by a mix of residential, office and other uses. Every substantial space would have some of each use along its length, giving diversity and a balanced day/night rhythm. Residential uses could encompass the full range of market, key worker and social housing.</p>
<p>As the area is without an established street pattern to guide the design, the following new principal connections would enhance connectivity and permeability:</p>	<p>Access and Circulation proposals are shown on Parameter Plan KXC007 in the Main Site Development Specification.</p>

<p>From the Copenhagen Street/York Way entry point in the east to the Regent's Canal bridge in the west;</p>	<p><b>UDG Goods Street 2:</b> Goods Street is the direct continuation of Copenhagen street from the other side of York Way. A main artery within the Georgian Grain of pentonville, it is the primary link between the site and neighbourhoods in Islington.</p>
<p>From the Triangle in the northeast to the rear of the Eastern Coal Drops; and</p>	<p><b>UDS 4.11:</b> Long Park is central to a new network of routes between York way and Randell's road...in the northeast and Camley street and the canal towpath in the southwest. The space known to us as Randell's junction at the junction of Randell's Road and York Way would lead directly to a series of streets filtering through to the Long Park. It would also link via North square to the top of York Way and Canal Street.</p> <p>From there, a choice of routes via the Coal Drops, the landmark Gasholders, Goods Street, Canal Street or other side streets lead both to the towpath and to the new footbridge over Camley Street Natural Park, and from there to Camden Town or Camden Lock.</p> <p>In short, the urban grain of the development responds to and caters for, this north-east and south-west connection.</p>
<p>Continuing the main north-south axis from the Granary area to the York Way/CTRL bridge area.</p>	<p><b>UDS 3.2:</b> Market Square and Long park occupy the northern section of a natural fault line which runs from one end of the site to the other, bringing not only connection, but unity and resonance to the new urban grain. This central space would be only one of a number of routes connecting north and south, northeast and southwest, reflecting the prevailing north-south grain.</p>
<p>The principal intersections of the primary connection routes as shown on the diagram would provide a good opportunity to create a new central public space. If well framed by buildings, a space of this nature would add to overall open space and related facilities in a potentially safe and usable way, would lend legibility to the wider area, and would help in creating a place of some distinctiveness.</p>	<p><b>UDS 3.2:</b> Market Square and Long park occupy the northern section of a natural fault line which runs from one end of the site to the other, bringing not only connection, but unity and resonance to the new urban grain. This central space would be only one of a number of routes connecting north and south, northeast and southwest, reflecting the prevailing north-south grain.</p> <p><b>PRS 3.2 Long Park &amp; Market square:</b> Linking the Coal Drops to Long Park, Market Square would provide scope for specialist or seasonal markets as well as opportunities for other activities such as ground-based games boards available for everyone to use. Market Square would be intended as a flexible space and venue, where both formal and informal activities of various types could be hosted. When not used in these capacities, however, people would use the space for sitting and relaxing and watching the world go by.</p>

<p><b>Sub-area 5 – York Way and the Triangle. In general terms new development should enhance the environment....by:</b></p>	
<p>Establishing a northern focus connecting and integrating York Way, the CTRL bridge, the Triangle frontages, new development and routes to the south in a distinctive place. A mix of uses and active frontages, good design and attractive public realm can, with sufficient character and presence, revitalise this important area. Bus and Tram stops will help in this, and long sightlines through the CTRL bridge are also important;</p>	<p><b>UDS 4.15:</b> Coming South under the new CTRL bridge, we are immediately struck by dramatic views opening up between large new urban blocks. Moving along York Way, four long views to the south, all within the space of 200m lead us into King's Cross central. In particular, the view across North Square and into Long Park opens up the heart of the site to York Way.....</p> <p>.....Randell's Junction is the loosely formed space at the junction of Randell's Road and York Way. It is the focus of several new pedestrian and cycle links which it is hoped will be created between York Way and Caledonian Road through Bingfield Park and the Bemerton Estate. It forms the connector through King's Cross Central to the canal and via the towpath and the new Camley Street footbridge, to Camden Town.....The new bus stops on the west side, and the possibility that the new Cross River Tram might stop here, gives the feeling of a local hub.</p>
<p>Creating high quality entry points from York Way adjacent to the Triangle, Goods Way, Regent's Canal and across from Copenhagen Street;</p>	<p><b>UDS 4.15:</b> York way is treated as central rather than peripheral within the scheme; the urban grain of King's Cross Central opens up to York Way and aligns with existing cross-routes linking to the communities on the east side of the road. The spread of uses within King's Cross Central will complement the existing ones on the east side and responds to the natural node points at the Copenhagen Street and Randell's Road Junctions by creating particular foci.</p>
<p>Creating an active frontage at ground level with building height, scale and setback modulated to achieve a balanced townscape with development on the eastern side of York Way;</p>	<p><b>UDG York Way 12.1:</b> Developments along York way, and the adjacent landscaping, should create the familiar conditions of an 'ordinary' albeit busy major street leading into Central London. All developments on York way should positively address the street and wherever possible should have front doors on York way.</p>
<p>Varying height and massing, with access sightlines that open views of development to the west from York Way; and</p>	<p><b>UDG York Way 4.3:</b> York way can become a visually diverse and enjoyable experience. New developments should contribute to achieving this. Although the coherence of the street must prevail, buildings that take advantage of this potential diversity, whether on a large or small scale would be encouraged.</p> <p><b>UDS 4.15:</b> (York Way) accommodates a wide range</p>

	<p>of building types and scales. Its unity, in spite of such diversity, rests in the continuity both of its landscape design – trees, pavements, crossings – and of its ground floor frontages.</p>
<p>Maximising street and bridge lighting and surveillance that optimises community safety and perceptions of safety, combined with tree planting, co-ordinated street furniture and signage, and other street improvement initiatives that can draw on creative solutions. These should be extended northwards under the CTRL/North London Line (NLL) bridges to Agar Grove, and eastwards into Islington, to improve overall pedestrian movement and broaden the transition between existing and new areas.</p>	<p><b>UDS 4.15:</b> The wide pavements (of York way) will be lined with trees. This would be like Holland Park Avenue or Rosebery Avenue where the distance between pedestrians and traffic, combined with active uses and open frontages at street level, make the street a pleasant place to be.</p> <p><b>PRS 3.2 York Way:</b> Trees, planted in a comfortably wide pavement for pedestrians, would line the western side of the road forming an important part of the scheme-wide tree planting strategy and hierarchy. The new Goods Street and Canal Street would lead onto key junctions with York Way and together these roads would provide access to the northern part of King's Cross Central. Arriving from the north along York Way, a view of a pavilion building, to the west with the Triangle site to the east, would impressively mark the northern-most threshold of the development, framed by the tunnel running under the railway,. This would be soon followed by a brief glimpse of Long Park.</p>
<p><u>The Regent's Canal Crossing</u></p> <p>The canal bridge and its approaches form perhaps the most important length of the street. This crossing is actually a large and complex area of public realm extending 50 metres or more along York Way in both directions. It requires special care in new building scale and design, and in the surfaces, street furniture and public access to the canal, maintaining the viewing lines and creating a place where people might pause to enjoy them.</p>	<p><b>UDS 4.15:</b> Space opens up in all directions when we reach Maiden Lane Bridge. The broad view into Granary square along the canal brings the heart of the site out to the street. A line of trees (and a ramp down to the canal) picks up the curve of the canal on the north side, leading us along Wharf Road.....</p> <p><b>UDG York Way 4.3:</b> development Zone F is a crucial anchor, acting both as a counterpoint to the great expanse of the railway cutting and as a marker for the Goods Yard..... It should not form a visual or physical barrier between York way, the Canal and the Goods yard. Rather it should strengthen these connections.</p>
<p><u>Wharf Road to the Triangle</u></p> <p>The street character is marked by diverse building styles and scale, with set backs and defensive</p>	<p><b>UDG York way 4.3:</b> York way can become a visually diverse and enjoyable experience. New developments should contribute to achieving this. Although the coherence of the street must prevail, buildings that</p>

<p>designs in some places. There are – and will be further – level changes, where building design should compensate to retain activity at street level. An intensively planted zone or short length of boulevard could create special character.</p>	<p>take advantage of this potential diversity, whether on a large or small scale would be encouraged.</p> <p><b>UDS 4.15:</b> (York way) accommodates a wide range of building types and scales. Its unity, in spite of such diversity, rests in the continuity both of its landscape design – trees, pavements, crossings – and of its ground floor frontages.</p> <p><b>UDG York Way 6:</b> ....this variation in topography should be treated as an opportunity rather than a problem. Designs should respond this and to the sinuous curve of the northern part of the street, by building on the drama of York way as a unique and positive quality. Nonetheless, the substantial challenges of accessibility and active frontage should be met to create a comfortable and natural street experience.</p>
<p><b>The Triangle</b></p> <p>Variation in building heights and massing should be used to avoid over-dominating York Way and to respect the local view south from Dartmouth Park Hill, at the eastern end of the site. Good designs that avoid microclimatic, overshadowing and other impacts may allow a tall building to be located in the Triangle.</p>	<p>Addressed throughout the TES.</p> <p><b>UDG York Way 4.3:</b> The Triangle Site should have appropriate scale and massing to give: a sense of arrival from the North; strong but not overbearing enclosure to York Way; Both strong enclosure and a sense of openness to Randell's Junction; a marker on York Way, as seen from the south, benefiting from the curve on the road.</p> <p>The opportunity for substantial massing to the north should therefore be considered.</p>
<p>The mixed use development of the Area should continue into the Triangle, where the councils favour housing, with retail or other uses to enliven the street frontages. The lack of outlook at lower levels suggests this is an appropriate location for retailing and/or public leisure, incorporating a wide range of indoor and outdoor sports activities.</p>	<p>Addressed throughout the TES.</p> <p><b>UDG York Way 12.1:</b> The Triangle would provide a strong mix of uses which may include a small supermarket, health and leisure uses, child care facilities, community use, public amenity space and housing. This mix should be integrated with the public realm both inside and outside the boundary.</p>
<p>Subject to satisfactory designs and residential amenity being achieved this close to railway lines, the Triangle could accommodate about 200</p>	<p>Addressed throughout the TES.</p>



<p>one-and two-bed homes in contributing towards the overall housing provision in the Area. The site is considered well suited to keyworker homes as part of the range of market and affordable housing.</p>	
<p>Good walking, cycling and public transport connections to the main development are important aspects of successfully intergrating the Triangle, with safe crossings on York Way.</p>	<p>Addressed throughout the TES.</p> <p><b>UDS 4.15:</b> .....Randell's Junction is the loosely formed space at the junction of Randell's Road and York Way. It is the focus of several new pedestrian and cycle links which it is hoped will be created between York Way and Caledonian Road through Bingfield Park and the Bemerton Estate. It forms the connector through King's Cross Central to the canal and via the towpath and the new Camley Street footbridge, to Camden Town.....The new bus stops on the west side, and the possibility that the new Cross River Tram might stop here, gives the feeling of a local hub.</p>
<p>The CTRL services and access area should be intergrated into the wider townscape as much as possible, providing a satisfactory street elevation and boundary treatment that helps to lessen the utilitarian character of the pedestrian environment under CTRL bridges. Options exist for shared use of turning space, greened and landscaped hardstandings, and additional natural habitat. Access/gateway widths should be kept to a minimum.</p>	<p>Addressed within the Triangle Site Development Specification. The proposals provide for a new access from York Way, to be shared with the CTRL London West Portal Muster Area.</p> <p>Also addressed throughout the TES.</p>

- UDS = Urban Design Statement
- UDG = Urban Design Guidelines
- PRS = Public Realm Strategy
- TES = Triangle Explanatory Statement



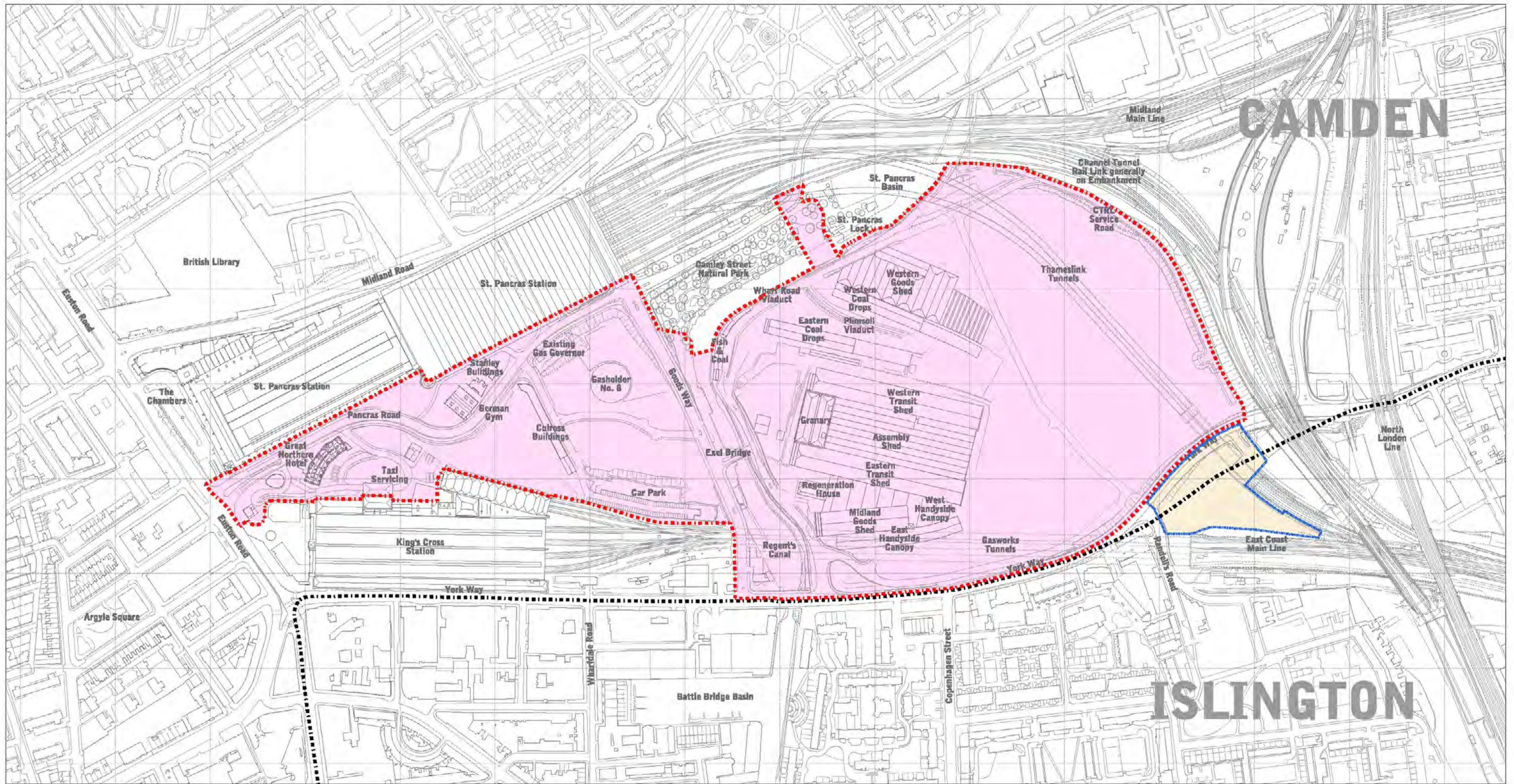
## Plans



**Plan A**

Extent of KXC Site (and immediate surroundings)





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Key:

- Main Site Planning Application Boundary
- London Borough Boundary
- Triangle Site Planning Application Boundary

NB: Some Aspects of the CTRL Design are Ongoing and Subject to Change

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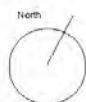
**Plan B**

Aerial Photograph of the KXC site (and immediate surroundings) as at  
November 2003





Aerial photograph. Copyright Simon Hazelgrove Tel. 020 79241222



- Indicative Site Boundary
- Indicative Borough Boundary
- Indicative Location of CTRL Embankment

## Annotated Aerial Photograph of the Site in November 2003

Figure 2.1.1

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