

REQUEST FOR A MAYORAL DIRECTION TO REFUSE APPLICATION PP/23/06575

BALLYMORE/SAINSBURY'S LABROKE GROVE, KENSAL CANALSIDE OA.

Submission from the St Quintin and Woodlands Neighbourhood Forum on site capacity, transport connectivity and emergency services access/resilience.

Strategic Issue: Development Capacity of the Kensal Canalside Opportunity Area

This representation is submitted by the St Quintin and Woodlands Neighbourhood Forum and the St Helens Residents Association following the decision of the Royal Borough of Kensington and Chelsea (RBKC) Planning Committee on 11 November 2025 to grant planning permission for the Ballymore & Sainsbury's scheme at Kensal Canalside.

This decision remains subject to Stage 2 referral to the Mayor of London and to the issue of a decision notice by RBKC. The expected date of referral is not yet known and may be delayed following the cyber attack which has affected the Council's IT systems since November 24th.

As part of an informal coalition of local residents groups, we request the Mayor to exercise his powers under the Mayor of London Order 2008 to issue a Direction to Refuse the application.

This submission covers one of the main grounds which we consider warrants a refusal direction – the fundamental concerns of North Kensington residents on **site capacity, transport connectivity and emergency services access/resilience**. These are not matters that can be remedied or adequately mitigated by planning conditions or at Reserved Matters stage. The Borough's grant of consent, if carried through to Stage 2 approval and a decision notice, risks undermining the sound and consistent application of the London Plan particularly in relation to the Mayor's strategic oversight of London's 47 Opportunity Areas (OAs) in terms of their readiness for development.

This is not a local objection to development in principle. Rather, it is a concern that the quantum and form of development approved are not supported by deliverable infrastructure, and that the scheme **represents a critical test case for how London's Opportunity Areas are planned, phased and regulated**. The context at Kensal Canalside OA is one of material changes over time to previous assumptions on transport connectivity, including access for emergency vehicles.

Basis for Mayoral Intervention

We consider that the proposal meets all three tests for Mayoral call-in:

1. **It would have a significant precedential impact on the implementation of the London Plan**, particularly Policies D1, D2, and D3 concerning infrastructure capacity, connectivity and the design-led approach to density;
2. **It would give rise to significant effects extending beyond a single borough**, with demonstrable impacts on residents and infrastructure in Kensington and

Chelsea, Brent, and Westminster, including transport networks, emergency access, walking and cycling routes, canal-side environments, and access to services.

3. **There are sound strategic planning reasons for intervention**, arising from the mismatch between proposed density and the physical, operational and transport constraints of the site, compounded by reliance on future infrastructure that has now has very extended (or non-existent) timelines for delivery.

Development Capacity of the Site: A Strategic Failure of Alignment

Our central concern is that RBKC's approval reflects a long-term drift between theoretical housing capacity and physical deliverability within the Kensal Canalside Opportunity Area.

It is helpful to distinguish between three forms of capacity:

- **Theoretical capacity**, expressed in policy targets (in this case in the London Plan and Local Plan)
- **Physical capacity**, defined by the realities of geographical barriers, access, egress and transport infrastructure
- **Operational capacity**, relating to the day-to-day functioning of a neighbourhood

While theoretical and proposed capacity figures for the OA have steadily increased over time, **physical and operational constraints have not been resolved**, and in some cases have worsened. This indicates not a planned intensification, but an incremental erosion of earlier capacity safeguards.

Original planning assumptions no longer apply

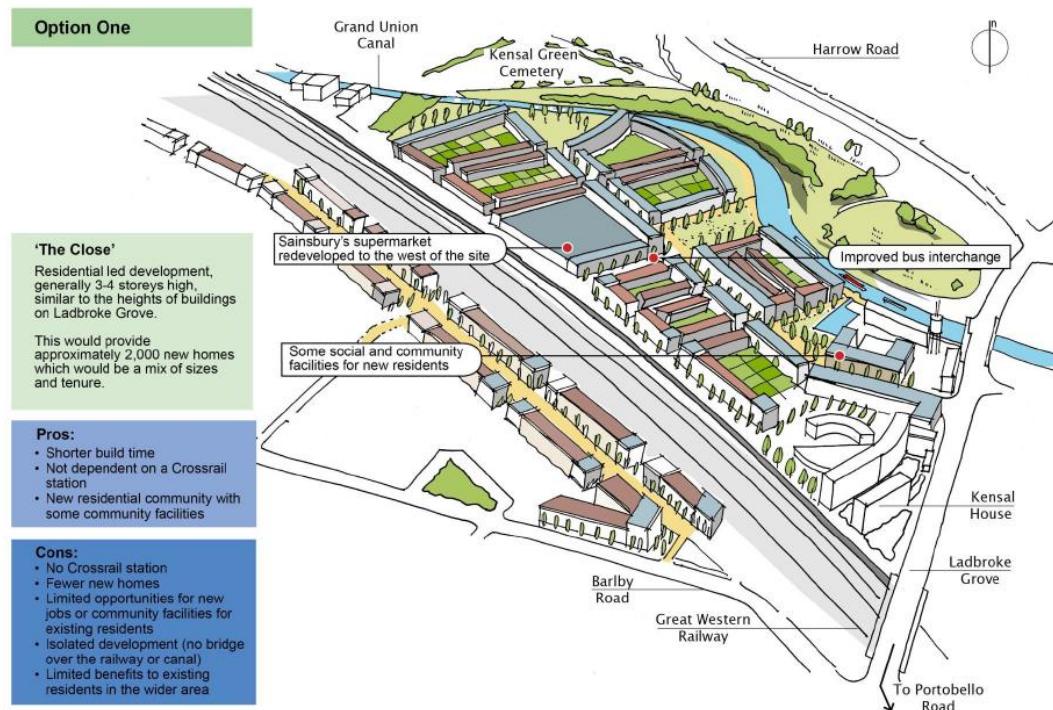
In 2012, RBKC consulted on three regeneration options for the OA. *Option 1* (illustrated overleaf) assumed **no Crossrail station and no new bridges**, recognising the site's island character and limited access. That option envisaged approximately **2,000 homes across the entire OA**, including land owned by Network Rail.

Options 2 and 3 in the 2012 document *Issues and Options for Kensal Gasworks* both assumed a new Crossrail station at the heart of the Opportunity Area. The consultation was very clear that Options 2 and 3 were '**dependant**' on such a station and also proposed a new long-span bridge across the rail lines from the main part of the OA to Barlby Road. Option 3, involving taller buildings, assumed **up to 3,500 housing units across the entirety of the OA**, including the southern strip in Network Rail ownership.

This 3,500 figure was subsequently included as the housing target in the 2016 London Plan with the caveat that *The scale and scope of development as an Opportunity Area is dependent on resolution of a number of challenges and constraints, improved public transport accessibility will be a major determinant of the final scale of development.*

The 2021 London Plan retained this figure, despite objections that by that time the prospect of a Crossrail station was highly unlikely.

Option One: 'Close' – No Crossrail station, residential-led development



The Council consulted and prepared a SPD for the Opportunity Area, adopted in July 2021. This used the 3,500 figure as a starting point and concluded that there was *clear evidence for delivering above the minimum 3,500 home allocation*. The evidence base for this conclusion rested on a series of capacity studies, all of which continued to assume improved transport infrastructure in some form.

Thirteen years onward from the 2012 view that 2,000 homes was a suitable aspiration in a 'no Crossrail' scenario, and despite the absence of firm or funded plans for new bridges, new road access or an Elizabeth Line station, the OA is now being treated as capable of accommodating **4,000–5,000 homes**. The Ballymore application alone proposes **2,519 units**, and the neighbouring St William scheme up to **891 units**, before any development on the Network Rail land is even defined.

The history of this escalation of housing numbers has been covered in detail in representations from our neighbourhood forum (and from the Kensington Society) on the 2021 SPD and during the Examination in Public of the Draft 2024 RBKC Local Plan.

At each stage there has been some acknowledgement of the need for critical new transport infrastructure, but this has been coupled with a willingness by planning officers and decision-makers to accept or ignore the scale of the increased housing

numbers. There has been a similar willingness to accept imprecise assurances by the applicants and their consultants of future joint work to find solutions at later stages.¹

Opportunity Area readiness as assessed by the GLA: A direct policy contradiction

The GLA's own Opportunity Area "pen portrait" assessment, published in 2025, concludes that Kensal Canalside should be **retained as "nascent"** — the lowest category of readiness — precisely because its development capacity is dependent on new transport connections that have not been delivered and are not part of either of the two current major applications for the OA.

The pen portrait explains that this conclusion of 'nascent' status is reached on the basis that *Masterplan and development quantum is reliant on new connections that are needed to increase accessibility of the site*. And that *The delivery of the two pedestrian and cycle bridges as identified within the Kensal Canalside SPD are fundamental to the successful creation of a new community at this site* (our emphasis in GLA wording taken from the below slide —full information on these GLA pen portraits is at this [link](#)).

The **GLA Stage 1 report on the application** also identified capacity and connectivity problems as needing to be addressed and resolved.

Kensal Canalside Moving forward

- Kensal Canalside is **one of the last remaining major brownfield sites** to be developed in London and the largest in the Royal Borough of Kensington & Chelsea (Potential for GLA support / OA prioritisation).
- **No significant development** has been approved/ started/ completed since OA designation.
- Currently the OA is an 'island', **with poor pedestrian and cycling connectivity**. Example of how poor connectivity (not necessarily a 'big ticket' infrastructure scheme) can impede growth.
- Masterplan and development quantum is **reliant on new connections that are needed to increase accessibility** of the site.
- **The delivery of the two pedestrian and cycle bridges** as identified within the Kensal Canalside SPD are fundamental to the successful creation of a new community at this site.
- Ballymore and Sainsbury's submitted a planning application for a large part of the site allocation (2023). There is no decision yet.
- **Land remediation** is another key challenge for the site.
- **Phasing and meanwhile uses** could be crucial for delivering an inclusive and safe new part of West London.
- Opportunity for a landscape/ biodiversity - led plan.

Proposition

- OA to be retained as 'Nascent'.
- Potential for GLA support to resolve focus - opportunity for an inclusive and green new neighbourhood right next to OPDC.



Ballymore and Sainsbury's joint venture plans for major new canalside neighbourhood in Lad-broke Grove

Extract from the GLA's Opportunity Area "pen portrait"

¹ See for example the March 2025 Railway Bridge Note from Rolfe Judd included with application PP/23/06575

Granting consent for development of this scale prior to resolving those dependencies creates a direct contradiction:

- Either the OA is genuinely “nascent”, in which case intensified development should not proceed; or
- The GLA classification has no practical force, undermining the entire OA assessment framework across London.

Allowing this scheme to proceed without Mayoral intervention risks signalling that GLA strategic assessments of **Opportunity Area readiness and progress are not evidence-based nor of material significance**. This will weaken public confidence in the London Plan and its next iteration. In these circumstances, it would be hard to characterise a decision *not* to intervene as being genuinely ‘plan-led’ rather than ‘developer-led’.

Transport Context: A materially changed reality

The planning justification for intensified development at Kensal Canalside has for over a decade been linked to anticipated connectivity improvements. One of these is for developments in North Kensington to be within reasonable walking distance from the **‘rail superhub’ at Old Oak Common**. Originally due to open in 2026 this rail interchange will include Elizabeth Line platforms – vital for new residents - in addition to HS2 and GWR services.

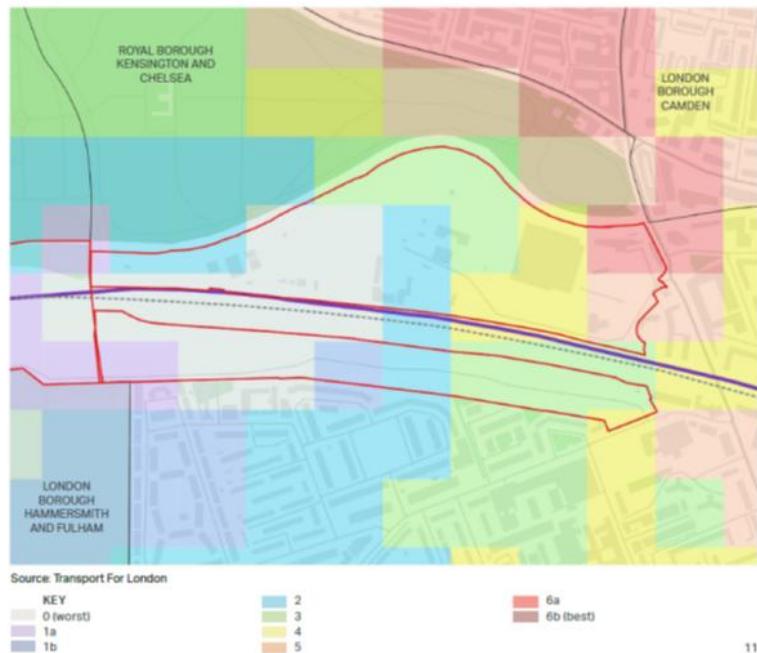
This context has also materially changed, along with the lack of new bridges at Kensal Canalside:

- The Old Oak Common interchange will not be fully operational until the **late 2030s or early 2040s**, well beyond the likely occupation of most phases of the Ballymore/Sainsbury’s scheme.
- On November 24th, 2025, HS2 CEO Mark Wild advised Old Oak residents that any scope for ‘early opening’ of Elizabeth Line platforms at OOC station will be limited to one year, at maximum, in advance of HS2 lines.
- Following OPDC’s abandonment of plans for Old Oak North in 2019, there are no plans for **road access** at the eastern end of the Old Oak Common rail interchange, from Wood Lane/Scrubs Lane at the western end of Kensal Canalside OA. **Plans developed by TfL for a new Overground station at Hythe Road on what is now the Mildmay Line also fell apart in 2019.**
- Even when OOC station comes into operation, the sole ped/cycle route to and from the Ballymore/Sainsburys site involves the canal towpath and a convoluted ramp and bridge linking to the eastern end of the platforms, with a journey distance of **1.5–2 km**

These extended timescales and changes to earlier assumptions post-date the 2024 RBKC Local Plan. RBKC Local Plan Site Allocation SA1 (K) *requiring new or improved infrastructure, including a new pedestrian and cycle bridge over the railway* has been set aside by the Council’s Planning Committee in reaching its November 11th decision.

Kensal Canalside

Transport and connectivity: PTAL 2031



GLA diagram from their 2025 pen portrait showing 2031 PTAL levels at Kensal Canalside OA

As shown above, 2031 PTAL levels across much of the OA will remain low by inner London standards, with **only the parts of the OA directly adjacent to Ladbroke Grove achieving PTAL scores above 4**. This raises serious questions about the suitability of car-lite, high-rise development at the proposed density of the Ballymore proposals.

This history begins to illustrate a significant picture of how any policy robustness within London's planning system may be undermined over time by the ambitions of developers. It is notable that in the same month that RBKC adopted the KCOA SPD (July 2021), Sainsbury's and Ballymore announced the terms of [their 'strategic partnership'](#) and their 'emerging plans' for 2,800 homes and a canalside town centre at Ladbroke Grove.

At this same time In March 2021, our neighbourhood forum raised concerns with RBKC when the Ballymore & Sainsbury's team told us (in an email exchange) that "*Our plans for the site have drawn heavily from the findings of RBKC's SPD and we hope that they will be shaped further by community feedback*". **This was at a stage when the SPD was in draft form only and had yet to be published for public consultation.** RBKC officers acknowledged at the time that 'engagement with landowners' had included access for Ballymore/Sainsbury's to the SPD's content prior to publication. The applicant team were warned to more mindful of the language in their statements.

Negotiating the detailed content of a SPD with an applicant prior to public consultation makes mockery of a ‘plan-led’ system.

The consequences of this developer-led escalation on housing density will impact beyond Kensington and Chelsea, affecting movement patterns and pressures in Brent and Westminster, including along the canal corridor and adjoining neighbourhoods, and (in our assertion) are non-compliant with several London Plan policies:

- **D1 B2** on improvements to infrastructure capacity.
- **D2 A2** requiring *densities to be proportionate to the site’s connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services)*.
- **D3** Optimising site capacity through the design-led approach. **D3 B states:** *Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.*

The Stantec/Carter Jonas *Kensal Canalside Development Infrastructure Funding Study Refresh* (2021) identified the obstacles to providing a new multi-modal bridge from the southern part of the Ballymore/Sainsbury’s site to Barlby Road. These obstacles (including level changes and heights of electrification lines) appear to be fundamental. It seems unlikely that such a bridge will ever happen. This has serious implications for emergency access to a 2,500-unit residential development.

Emergency access and resilience

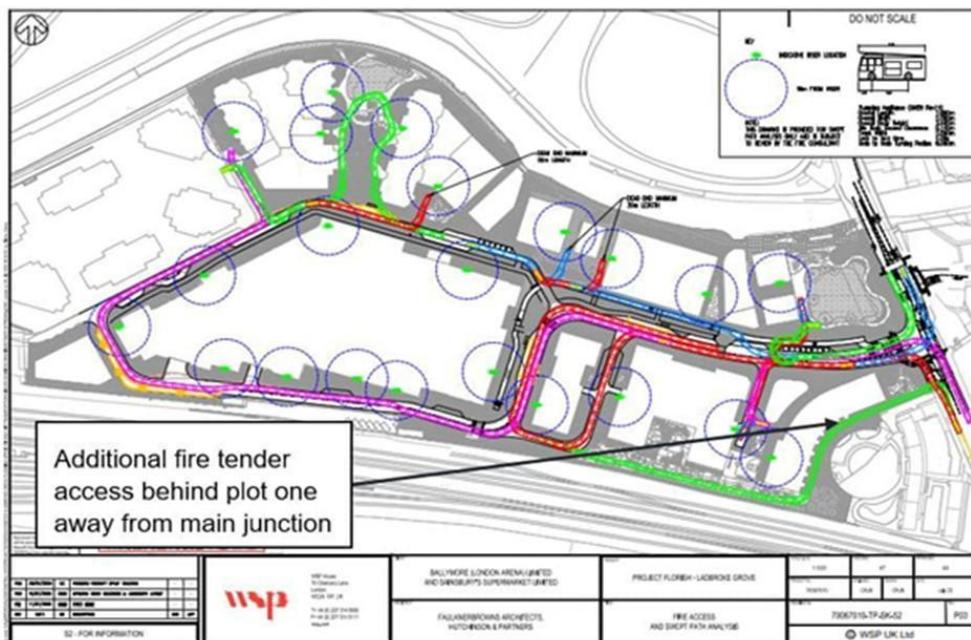
Following the 2017 Grenfell fire and the 1999 Ladbroke Grove rail crash (in which 31 people were killed and 417 injured) any concerns over access to a site for emergency vehicles is a very sensitive subject for residents of neighbouring parts of Brent and North Kensington.

The 2021 RBKC SPD for the Opportunity Area stated *The Council will expect the developers to work closely with the Council and relevant third parties, such as London Fire Brigade to ensure that the site is designed from the outset to meet exemplar fire safety standards, including emergency access provision* (our emphasis).

During the RBKC Planning Committee meeting on November 11th 2025, Cllr Will Lane asked the applicants to address concerns about emergency access to what is effectively an island site. The applicants confirmed that **vehicular access is limited to a short section of Ladbroke Grove**, and that further consideration of access arrangements would be addressed through reserved matters. No alternative route for fire engines or other blue-light services has been identified should this section of Ladbroke Grove be blocked by an incident or severe congestion, which is a regular occurrence on this major north/south corridor.

The 2023 Transport Assessment prepared by WSP and accompanying the application identifies a ‘secondary’ access for emergency vehicles, as shown below. But this route is located very close to the main entry/exit point to the OA and would be equally vulnerable to gridlock of vehicles in this section of Ladbroke Grove.

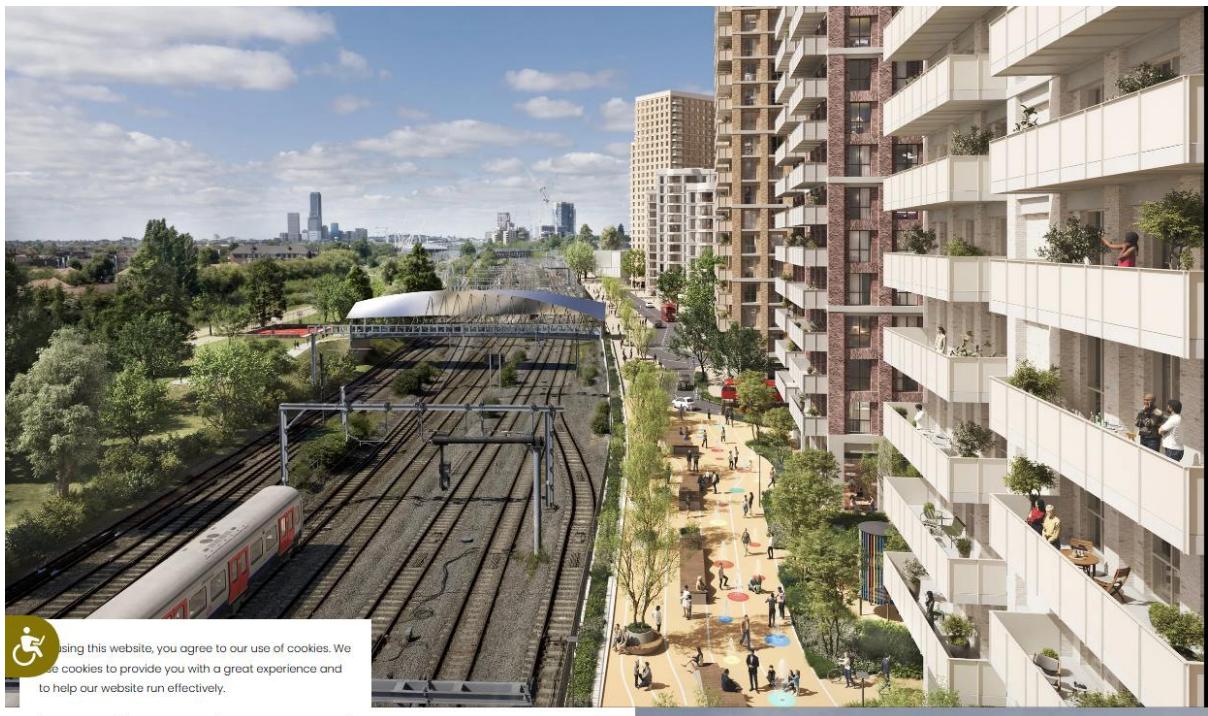
Figure 5-11 - Fire Tender Access



This secondary route falls far short of ‘exemplar fire safety standards’. The approved masterplan in the hybrid application does not meet a basic operational test for a new neighbourhood at this scale: **safe and reliable access for emergency services under foreseeable failure conditions**.

The principle of very high-density development being approved in the absence of a resilient access and egress strategy for emergency services, raises concerns under **London Plan Policies D2** (density proportionate to accessibility), **D3** (optimising site capacity through a design-led approach), and **D12** (embedding fire safety considerations at the earliest stage, including access for emergency services).

The secondary route is described by WSP as being *a minimum of 3.7m in width, in accordance with Building Regulations Approved Part B, and would be available for use by fire tenders if needed*. In other parts of the application material, this route features as ‘South Drive’ filled with public realm ‘greening’ and seating. The CGI image below, from the Project Flourish website also shows the ped/cycle bridge designed by Studio Benarski, which has been omitted from the application. One option for this bridge would have provided a secondary means of emergency vehicle access, but this has been dismissed on the basis of gradients required for vehicle traffic coupled with heights of electrification lines on the rail tracks.



Ballymore& Sainsbury's visualisation of 'South Drive' secondary route for emergency vehicles, filled with pedestrians, seating, play areas and landscaping.

Condition 110 of the RBKC planning consent requires submission and approval of a Fire Statement for each Reserved Matters application. But this is too late in the day, in respect of a hybrid grant of consent to a development of 2,519 housing units on a site with secondary emergency access limited to a route 30m distant from the sole main entrance/exit on a notoriously congested part of Ladbroke Grove. The proposed quantum of development exceeds the site's physical and operational capacity, given the existing transport infrastructure and with no identified or funded plans for substantive improvements.

The consequences of this access limitation extend beyond RBKC. Ladbroke Grove and the surrounding highway network serve movements affecting **Kensington and Chelsea, Brent and Westminster**, meaning that any failure of access resilience has **cross-borough public safety and operational implications**. This further supports the case that there are sound strategic planning reasons for Mayoral intervention.

Hybrid Consent: Locking in risk without resolution

UK EIA Regulations 2017 and government practice expect **assessment of cumulative effects**: the combined/in-combination effects with other existing or approved projects affecting the same receptors.

RBKC has granted consent for a **hybrid application**, approving the principle of a high-density masterplan while deferring critical details to later reserved matters stages.

Given the site's complex contamination history, constrained access, tall buildings, and tight servicing corridors, this approach carries particular risk.

Once the **principle and scale of development** are fixed and no significant funding sources are identified for what would be very major items of transport infrastructure, the future implications are serious:

- Mitigation of transport impacts remains highly problematic as well as very costly.
- Servicing, emergency access and movement constraints are effectively locked in

Questions and objections have been raised by local Amenity Societies and Residents' Associations at every stage, including the EIR application. Many of these issues have not yet been addressed—and may never be addressed if development proceeds on the basis of a hybrid consent.

This is not a neutral deferral of detail; it is an **irreversible commitment to a density that has not been demonstrated to be operationally viable**. Once outline consent is granted, neither Stage 2 referral nor reserved matters can revisit the fundamental question of whether this scale of development is appropriate for the site.

Cross-Borough Impacts

The impacts of the scheme are not confined to RBKC. Residents in Brent and Westminster will experience:

- Increased pressure on walking and cycling routes, particularly along the canal and Ladbroke Grove.
- Cumulative transport impacts from multiple large schemes in West London and within the Kensal Canalside OA itself.
- Increased bus journey times.
- Reduced accessibility to services and employment due to constrained connectivity.

These are precisely the types of cross-boundary effects for which Mayoral oversight is intended.

Conclusion: Request for Mayoral Intervention in the form of a Direction for Refusal

Indicative Strategic Reasons for Refusal (Stage 2)

1. Site capacity and accessibility

The scale and density of development are not proportionate to the site's existing and foreseeable accessibility, contrary to London Plan policies D2 and D3, and have not been shown to be deliverable within current infrastructure constraints.

2. Opportunity Area readiness and infrastructure dependency

The proposal relies on future transport connections that are neither delivered

nor secured, conflicting with the London Plan approach to Opportunity Area readiness and undermining the plan-led framework.

3. **Access and emergency service resilience**

The development proposals have not demonstrated a robust and resilient access and egress strategy, including for emergency services, at the outline stage, contrary to London Plan policies D3 and D12. This deficiency cannot be resolved through conditions or reserved matters.

This application raises strategic planning issues of London-wide importance that cannot be satisfactorily addressed through conditions, planning obligations, or Stage 2 modifications.

The approved quantum of development has not been demonstrated to be compatible with the site's physical and operational capacity, having regard to its constrained access, limited connectivity, and materially changed transport context.

In particular, the proposals conflict with the design-led approach to optimising site capacity required by the London Plan, as the scale and intensity of development are not proportionate to the site's existing and foreseeable levels of accessibility or infrastructure provision. These deficiencies arise from the principle and scale of development itself and cannot be remedied at reserved matters stage.

In these circumstances, we respectfully request that the Mayor issue a Direction to Refuse planning permission at Stage 2.

A decision not to intervene would require the Mayor to set aside:

- the GLA's own assessment of Kensal Canalside as a "nascent" Opportunity Area, whose development capacity is dependent on new connections that are neither delivered nor secured;
- the materially changed transport assumptions following loss of a proposed Hythe Road Overground station, and delayed delivery of Elizabeth Line platforms at the Old Oak Common rail interchange;
- the cumulative cross-borough impacts affecting Kensington and Chelsea, Brent and Westminster, including movement networks and emergency service access.

Should the Mayor consider that these matters require further examination, call-in would be the only alternative mechanism capable of addressing them. However, we submit that the evidence before him already demonstrates that the proposal, as approved, exceeds the site's demonstrable capacity and is inconsistent with strategic policy.

Mayoral intervention in this case would not represent opposition to much needed housing delivery in London. It would instead confirm that intensification within Opportunity Areas must remain infrastructure-led, evidence-based and policy-compliant. Otherwise the concept of intensification in OAs becomes a charter for developers to push continuously for higher housing numbers and densities, relying on

finding ways to ensure that local plan and London Plan policies can effectively be bypassed in the ‘planning balance’.

The Ballymore/Sainsburys scheme has all the hallmarks of developer-led aspirations prevailing over planning policies. Our neighbourhood forum has been working alongside other local groups which are making related representations at Stage 2 on other policy areas such as decontamination risks, lack of affordable housing, and heritage matters.

A strong message from the Mayor of London is needed in respect of this application at Kensal Canalside, if the new London Plan is to maintain credibility for serious GLA strategic oversight of what happens in each of London’s 47 Opportunity Areas.

If the well-founded assessment of Kensal Canalside as a “nascent” Opportunity Area were now to be set aside through non-intervention at Stage 2, this case will send a damaging signal about the weight given to evidence-based strategic planning at London-wide level.

Our 380 members have discussed this scheme at our open meetings over several years, have attended the Development Forums arranged by the Council, and are aware of the pressures on the local planning authority (including the impact of the ‘tilted balance’ in determining major housing schemes). There is a wish to see the Opportunity Area developed, but only when the basics of making these sites ready and fit for this purpose. We ask for the Mayor’s careful consideration of the range of concerns coming forward from ourselves and other local organisations.

Henry Peterson
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