

OVERVIEW ON DEVELOPMENT CAPACITY OF THE SITE FOR NEW HOUSING

RBKC has been considering the Ballymore application since 2023. It has been well over a decade since the Council started consulting local people on how development at the Kensal Canalside Opportunity Area should be brought forward.

This has meant that some of the basic questions on how many new homes should be built on the site, while meeting London Plan and Local Plan policies and creating a successful new part of Kensington, have faded into the past. This briefing is designed to remind Planning Committee members of the **key facts** involved in the forthcoming decision at the November 11th Planning Committee.

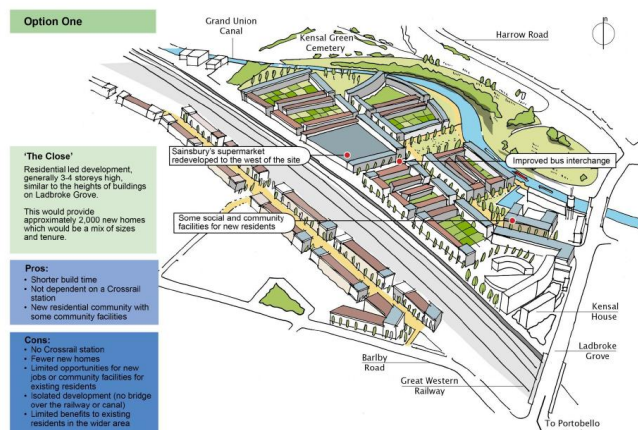
Fact 1 the number of new homes on the site has grown while the transport infrastructure has not changed (and will not change).

Back in 2012 when the Council consulted on [three options for regeneration of the Opportunity Area](#), only 'Option 1' assumed 'no new Crossrail station' and 'no new bridges' to improve connectivity of an island site with a single entrance/exit. Much has happened since then, **but this has turned out to be the transport scenario reflected in both the Ballymore and the St William applications which the Planning Committee will be deciding.**

It must be remembered that the early days of consultation on Project Flourish left open the question of a new bridge to Barlby Road. Similarly RBKC has required safeguarding of the site for a possible Elizabeth Line station. Many of the public do not appreciate that these new pieces of transport infrastructure **are neither planned nor funded in advance of a decision on a hybrid application with a 10 year time horizon for construction.**

Option 1 for the Opportunity area, as illustrated in the 2102 RBKC Issues and Options consultation document (see below), assumed only 2,000 new homes across the entire OA including the southern strip owned by Network Rail. **Why has a housing capacity deemed appropriate in 2012 morphed into a wholly different level in 2025?**

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

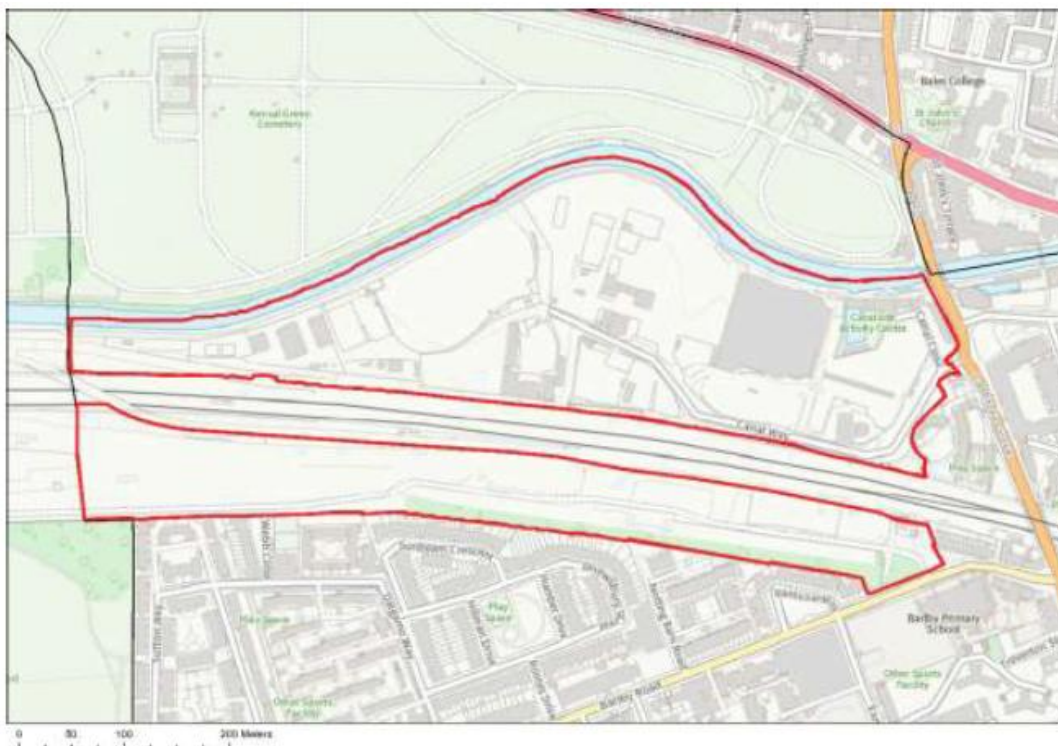


Fact 2 retro-fitting of development capacity

The Ballymore application proposes 2,519 new homes. The St William application proposes a ‘maximum provision’ of 891 homes. The quantum of future development on the southern part of the OA (the North Pole site owned by Network Rail is likely to remain unknown for many years yet.

The London Plan 2021 included a total figure of 3,500 housing units as an ‘indicative target’ for the OA **to be tested via the local plan process**. The RBKC SPD for the Opportunity Area (adopted July 2021) looked at scenarios of up to 5,000 units overall. The site allocation in the RBKC 2024 Local Plan is for ‘around 3,500’ new homes to be ‘deliverable’ and ‘developable’ in years 0-10 of the plan period.

Development capacity at this level has been questioned and challenged by local amenity groups at every consultation stage on the SPD, London Plan and Local Plan. Despite all these representations, **the 3,500 housing figure looks like becoming reality even without allowing for a third large third part of the Opportunity Area.**



Importantly, housing targets set in each planning document have included caveats and qualifications, noting that **improvements to transport access are needed to unlock high density development on an ‘island’ site**. This history is detailed in the first objection to the Ballymore application from the Kensington Society. Yet it has become accepted by RBKC that 3,500 new homes can be built on the northern part of the Opportunity Area, even in a ‘no Crossrail/no bridges’ scenario. No adequate explanation of this change of position from 2012 has yet emerged.

Fact 3 GLA planning officers do not see Kensal Canalside Opportunity Area as being ready for high density development at the scale proposed


As part of the summer 2025 GLA consultation on [Towards a New London Plan](#), the GLA has published a set of ‘pen portraits’ of each of London’s 47 Opportunity Areas. This included an analysis of progress at the Kensal Canalside OA since this was first designated by the Mayor in 2011. For the full set of information see at this [link](#).

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

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This GLA pen portrait places the Opportunity Area in the lowest of five categories of progress to date, and as remaining as ‘nascent’. This is 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 within text from the above GLA slide).

The [GLA Stage 1 report on the Ballymore application](#) identifies problems with the transport aspects of the application. These have not been resolved.

Fact 4 a ‘hybrid’ application seeking outline permission for a masterplan carries risks and makes assumptions that cannot be justified at this time

The site is an ex-utilities/gasworks/rail-railhead environment with complex contamination, tall buildings, and tight movement corridors. Deferring key parameters (height, massing, layouts, remediation and servicing routes) to later reserved-matters

stages **prejudices proper assessment of significant effects** that should be resolved **up-front** for EIA, design quality, and transport/servicing.

Questions and objections have been raised by local amenity societies and RAs 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.

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. This includes inter-project (e.g. St William plots) and intra-project effects across delivery phases.

Fact 5 the potential attractiveness and ‘connectivity’ of West London has diminished as a result of the HS2 ‘reset’.

Since 2015, the potential for regeneration in West London has been talked up by landowners/developers on the basis that the Old Oak Common rail interchange will have a catalyst impact on the wider area. Both HS2 and the Old Oak Development Corporation have promoted the Old Oak location as having ‘unparalleled connectivity’ and as part of a West Tech Corridor [about to undergo a £10bn ‘development boom’](#).

The reality is that the OOC rail interchange (giving access to the Elizabeth Line and GWR as well as HS2 to Birmingham) is half built but will not now be operational until the late 2030s/early 2040s. The original planned opening date was 2026. The station has been designed with no road access at its eastern end, from Wood Lane/Scrubs Lane. Access to Elizabeth Line platforms from the Ballymore site will only be via the canal towpath and a convoluted ped/cycle bridge with an overall distance of 1.5 to 2km. Even this limited public transport option will not be available to incoming residents until 10-15 years hence.

Levels of public transport access at the Kensal Canalside OA will remain very low by inner London standards. This impacts significantly on the marketability of high rise housing units in a car free development.

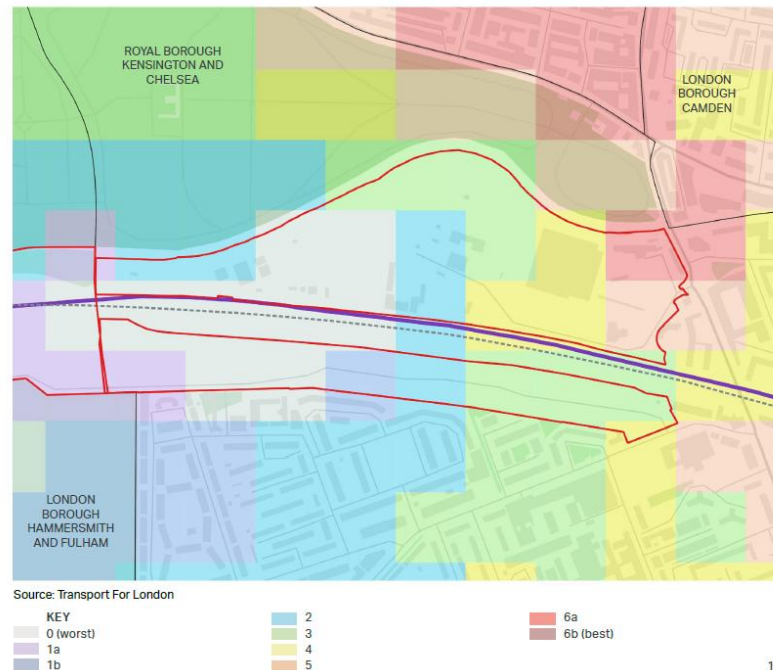
New developments at Mitre Bridge in Scrubs Lane (adjacent to the Kensal OA but separated by the West London Line) were granted consents before plans for a Hythe Road Overground station and major new town centre were abandoned by Cargiant in 2018. Sales/rentals are proving slow and brand new apartments are already entering the managed short let market rather than providing much needed homes.

The suitability of the Ballymore/Sainsburys site for high-density high-rise living is not what was foreseen even 5 or 10 years ago. The ‘vision’ in the RBKC SPD, that a Kensal Canalside Opportunity Area *will have been transformed from a former gasworks and railway depot into a thriving, well-connected mixed and inclusive community* will

not be achieved unless and until the necessary transport connections to the site are provided.

Kensal Canalside

Transport and connectivity: PTAL 2031



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GLA diagram showing PTAL levels at Kensal Canalside OA. Only the parts of the OA closest to Ladbrooke Grove have PTAL levels above 4. Were the applicant site not within an inner London Opportunity Area, the London Plan requirement for car free housing would not apply under Policy T6.1 on Residential Parking.

There is a real risk is of creating a new 'place' in North Kensington where residents are faced with major problems of travelling to and from work, taking children to school, and accessing all forms of local amenities. These problems have already emerged in the neighbouring Old Oak and Park Royal Opportunity Area, where premature planning consents were granted before masterplans were finalised and transport connections secured.

Fact 6 Compliance with London Plan policies has not been demonstrated

As pointed out under 'Fact 1', representations made on the Draft London Plan, the Draft Kensal SPD, and the RBBKC Draft Local Plan have flagged up non-compliance with existing of proposed policies.

Because the 2024 Local Plan was finalised months **after** submission of application **PP/23/06575**, officers may prove able to demonstrate that many aspects of the scheme are policy compliant. Building heights are an example of such 'retro-fitting' of a development plan.

But compliance with policies in the 2021 London Plan will prove harder to demonstrate. Objections from the Kensington Society, the St Quintin and Woodlands Neighbourhood Forum, and other RAs and local groups have questioned compliance with the following London Plan policies:

London Plan Policy D1 B2 on improvements to infrastructure capacity

London Plan Policy 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.*

Policy D3 Optimising site capacity through the design-led approach, D3 B stating *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.*

On housing densities, the Planning Statement submitted by the applicants provides no metrics. Figures provided by Ballymore during consultations in October 2023 are below:

Housing Density			
Plot 01	19585.5sqm (1.96ha)	748 Homes	381.6 Homes/ha
Plot 02	28606.2sqm (2.86ha)	947 Homes	331.1 Homes/ha
Plot 04	13557.6sqm (1.36ha)	501 Homes	368.3 Homes/ha
Plot 05	8383.9sqm inc' basin (0.84ha)	235 Homes	279.7 Homes/ha
Plot 06	5955.4sqm inc' basin (0.6ha)	88 Homes	146.6 Homes/ha
Total	76088.6sqm (7.62ha)	2519 Homes	330.5 Homes/ha (Average)

These figures seem low compared with those provided by St William for their neighbouring development. **St William have given an overall figure of 535 units/hectare** for what looks like a broadly similar scheme in term of building typology and open space.

While the London Plan Density Matrix is no longer in force as a policy requirement, decision makers at the Planning Committee should be provided with reliable figures on the net residential densities of the plots proposed in the hybrid application. Only then can comparisons be made with schemes with which councillors (and the public) are familiar with in North Kensington (such as Wornington Green Phase 1).

The committee report makes frequent references to the 'high density' of the proposed development. **But avoids explaining what net residential densities are involved.** This is despite specific requests for such information to be included in the committee report on the application, made in February and June 2025.

Henry Peterson, Chair St Quintin and Woodlands Neighbourhood Forum and St Helens Residents Association.