Fw: December 2023 newsletter from StQW Forum and St Helens RA

From: henrypeterson@aol.com (henrypeterson@aol.com)

To: henrypeterson@aol.com

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St Helens Residents Association St Quintin and Woodlands Neighbourhood Forum

Our open meeting on the 30th November was well attended for a cold winter evening and many thanks to all who came along including new members. The slides are now posted on the StQW website at this <u>link</u>. (You need to scroll down the web page to see the presentations from recent meetings).

These include the latest CGI images of the proposed Ballymore development. You will see below that the deadline for responses to the consultation on the planning application is **January 12th**. Please also look at the invitation to all members to take part in short-life working groups reviewing and updating the StQW neighbourhood plan.

At the meeting on the 30th, members asked for suggestions on how best to respond to the Ballymore application. See below.

Ballymore/Sainsburys planning application at Kensal Canalside

The proposals involve 2,519 new homes and a replacement superstore at the Kensal Canalside Opportunity Area (the former gas works site south of the Grand Union Canal and opposite Kensal Cemetery). If approved the development will be built out over a 10 year timescale.

This 'Opportunity Area' along with that at Earls Court are the last two large areas of land available for development in the Borough. Plans for new housing at Kensal Canalside go back over a decade. In 2013 the Council consulted on three options for the site, with housing numbers ranging from 2,000-3,500 new homes.

This history is important, as the biggest issue about this planning application is the way that the proposed density of development has grown over the years. The landholding owned by Ballymore and Sainsburys covers only the eastern part of the Opportunity Area. The western part is owned by Berkeley Homes/St William, whose separate scheme for 720 homes is currently paused. The strip of land south of the rail lines belongs to Network Rail and will not come forward for development for some years.

It now looks as if the whole of the Opportunity Area may end up with 4,000 new homes. This is double the figure suggested by RBKC back in 2013 as a suitable number for the option which

assumed that Opportunity Area would be able to 'capitalise on a new Crossrail station'. Lack of such a station is the current scenario, with no plans for an Elizabeth Line station at Kensal Cansalside. All those living in the new development (which will be largely 'car-free') will have to rely on an enhanced 'bus strategy' to provide access to public transport.

Ladbroke Grove Undergound is a 16 minute walk away. The whole Opportunity Area has a single entry and point off Ladbroke Grove. There are no firm plans to create any new access to the western end of the Opportunity Area, from Scrubs Lane.

It is not being NIMBY to question and challenge development proposals at these high densities on a landlocked site, in a part of London where traffic congestion is already severe. Proposed building heights in the Ballymore application have come down from 34/35 storeys to 29. The 'same height as Trellick Tower' appears to be seen by the Council and by the developers as an acceptable new norm for North Kensington.

Objections to building heights and the impact on views will feature significantly in objections from the <u>Kensal Triangle Residents Association</u> and the <u>Friends of Kensal Cemetery.</u>

Responding to the planning application

This can be done via an email to planningapplications@rbkc.gov.uk. You need to include the reference number PP/23/06575 in the header.

The details of the planning application can be found on the RBKC website, under <u>'planning applications search'</u> by entering this reference number or 'Canal Way' as the address. There are over 480 'documents' on the online planning file, including objections and supportive comments logged so far. The consultation period ends on January 12th, but the application will remain 'under consideration' by RBKC planning officers for most of 2024 so there will be time for further representations as new information emerges. The consultation website published by the developers is at <u>Project Flourish</u> and includes much background material.

Ballymore has engaged two firms of 'engagement' consultants to encourage supportive responses. One called <u>JustBuildHomes</u> has young people approaching shoppers at the existing Sainsburys with 'sign-up' forms to express support for the development. The other is <u>Thorncliffe/Your Shout</u> who are doing door-to-door canvassing with a template letter of support to the application.

There is nothing unlawful in canvassing support and objections in this way. The several campaigns now active in North Kensington and in Brent are doing the same thing (as is this newsletter).

If you would like to make an objection to the Ballymore/Sainsburys application, below are some of the grounds which you may like to consider. It is more effective to give a personal view rather than simply 'copy and paste'. Referring to numbered policies in the London Plan and the RBKC Local Plan also adds force to an objection. Hence these references are included below.

- Too many housing units proposed at a level of density inappropriate for a site with poor access to public transport (Net density 330 units/hectare). This is not a well connected location. Building at this density will be contrary to London Plan policies D2 and D3.
- The housing targets of 3,500 homes for the Opportunity Area as included in the RBKC Local Plan and London Plan date from the 2016 London Plan. This was adopted when an Elizabeth Line station was being proposed by RBKC. Such a station is now off the agenda.
- The same figure carried forward into the 2021 London Plan figure was 'indicative' only and a lower figure for the Opportunity Area is now needed if development is to be successful and sustainable.
- Necessary new transport infrastructure at Kensal Canalside has not happened. Hence development on the scale proposed is contrary to London Plan Policy SD1(b).
- The application proposes 20% affordable homes, whereas the RBKC Local Plan seeks 35% of 'genuinely affordable' community housing by floorspace (RBKC Policy HO3 in the New Draft Local Plan).
- The problems with this site as mentioned in the 2016 London Plan have not been solved (barriers of rail and canal corridors, single access/exit, Ladbroke Grove traffic congestion, reliance on 'more buses' for public transport).
- No link is proposed through to the OPDC area (Scrubs Lane and Old Oak Common station). An area of high density housing with a single access/exit point on a congested main arterial road is unsafe in terms of access for emergency vehicles as well as leaving parts of the site with levels of public transport access too low for 'carfree' residential accommodation, contrary to RBKC Policy T5 on Land use and Transport.
- High density has led to tall buildings. While proposed heights have been reduced to 29 storeys from 34/35, such heights will harm the skyline as seen from Kensal Cemetery and are inappropriate to North Kensington.
- The proposals include a low amount of 2.5 sq m public open space per person. This will not make for sustainable and successful development.
- The site has only partially been decontaminated. At present it is not clear that the requirements of RBKC Policy G19 have been met.

You can select from and elaborate on the above. There will be other campaign groups coming up with alternative and further grounds for objections.

Ballymore will argue that their proposals are barely financially viable in the current London property market. And that if this application is not approved the site will lie empty and idle for many more years to come. It is hard to tell what the landowners/developers are expecting by way of profit on the scheme, and whether they would come back with lower densities after a refusal of this application. It is for the Council and its expert consultants to pore over the financial viability studies which the applicants provide.



Our open meeting discussed proposals for updating and revising the <u>2018 version of the StQW Neighbourhood Plan</u>, via a series of short-life working groups on the following topics. The groups will come into being with the involvement of members, so please email <u>sthelensassn@aol.com</u> (ideally before Christmas) to let us know if you are interested in any of the topics below.

- **Greening**, biodiversity, and widening community use of our three Local Green Spaces (Bowling Club, Nursery Lane, and the Kelfield backland).
- Alterations to houses and gardens: this section of the Plan will cover any neighbourhood-level adjustments needed to respond to new RBKC Local Plan policies and rules which control what we can/cannot do on home improvement and refurbishment projects. These include 'sustainable retrofitting'.
- The **shopping** section of the Plan which covers North Pole Road, St Helens Gardens, and Barlby Rd. The 2018 Plan needs changes to reflect the E class planning use. Other issues may emerge from a working group..
- Latimer Road and its RBKC 'design code', plans for the underpass, and future use of 274 (former Ariadne Nektar pub). Reviewing the existing five StQW policies for the street.
- **Housing**: there are two housing allocations in the 2018 Plan (Latimer Road at Units 1-14 above ground floor and at 142 Highlever Road. Might there be any more potential sites?
- **Health**: to include further protection from redevelopment at the site of the St Quintin Health Centre and any further health needs related to 'development of land'.
- **Transport**: continued lobbying for a new Overground station and addressing the need for eastern access by road to Old Oak Common station. Setting down a neighbourhood view on any potential new RBKC transport policies or initiatives (e.g. cycleways, Low Traffic Neighbourhoods).

An African Caribbean Cultural Centre for North Kensington

A community steering group led by Cllr Portia Thaxter has been overseeing the preliminary planning for a such a centre. There has been growing momentum in recent years for this idea..

A consultation has been launched by the steering group. This says that the Westway Trust "has committed to supporting the steering group in order that the community of North Kensington can self-determine the most appropriate model for a centre. The steering group extends a warm invitation to all interested individuals and parties to help shape this exciting project at this early stage".



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