

KENSINGTON AND CHELSEA NEW LOCAL PLAN REVIEW

RESPONSES TO THE INSPECTOR'S MATTERS, ISSUES AND QUESTIONS FROM THE ST QUINTIN AND WOODLANDS NEIGHBOURHOOD FORUM

Matter 4: Opportunity Area Sites and Site Allocations Issue 1: Whether the site-specific policies are justified, effective, consistent with national policy and in general conformity with the London Plan **Thursday 22 June 2023**

SA1: Kensal Canalside Opportunity Area.

- *What is the background to the site allocation? How was it identified and which options were considered? Is there inconsistency between the policy title and that of SA2?*

Our neighbourhood forum has been involved in consultations on this Opportunity Area for a decade. We commented in our response to the Regulation 19 that this location is not 'well connected' and has little prospect of becoming well connected in the absence of an Elizabeth Line station.

The Inspector's report on the 2019 RBKC Local Plan commented as below on the 3,500 housing target set for KCOA, as follows *Delivery at this scale relies on substantial enabling works and infrastructure, including the removal of the Hazardous Substances Consent (HSC) and clean-up of the former gas works, relocation of the existing food store, a new Crossrail station on the Elizabeth Line and new road links.*

Without such a station, and with no firm plans for road links giving access/exit at the western end of the Opportunity Area, we continue to argue that **this 3,500 target is unjustified and unsound**. The 2012 RBKC Issues and Options report¹ identified 3 options for the OA, including a target of 2,000 homes as the 'without station' option.

- *What is the scale type/mix of uses proposed? Are they clear? Does the policy include the correct quantum of housing and commercial floorspace? Is the reference to a minimum figure and its distribution within the development in general conformity with the London Plan?*

In responding to the Kensal Canalside Draft SPD, our Forum (and others) drew attention to the fact that London Plan targets for OAs are 'indicative' and should be tested through masterplanning. RBKC and developers at the site will no doubt argue that this testing has now been undertaken, via the SPD, some capacity studies, and pre-application discussions.

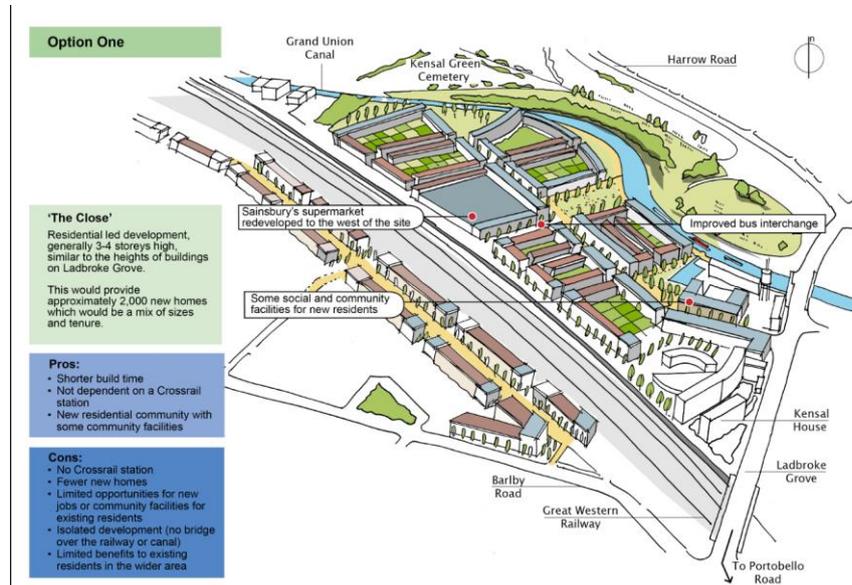
We consider that the proposals from Sainsburys/Ballymore, due to be submitted to RBKC shortly after the EIP hearings, demonstrate that testing through masterplanning of the site has failed to support a target of 3,500-4,000 new homes. The current proposals from both the developers involved (Ballymore/Sainsburys and Berkeley Homes/St William) will not deliver a successful and sustainable new part of the Borough.

- *Is the approach to tall buildings effective and justified?*

We think not. In 2012, RBKC consulted on an issues and options paper for Kensal Canalside. This identified three options in terms of scale of development. The image below illustrated the impact of the first option. This assumed 2,000 new homes, in the absence of a Crossrail station that would provide much improved public transport accessibility at this location.

¹ Issues and Options Paper for Kensal Gasworks RBKC June 2012

The fact that the council has moved on to consider much increased housing numbers and density levels, within its 2021 SPD and in the Regulation 18 and 19 versions of a Draft Local Plan, has caused widespread concern amongst residents in North Kensington and in Brent. This has been a policy shift driven by top down housing targets and developer aspirations, rather than by principles of sound spatial planning.



- *What are the infrastructure requirements/costs? How would these be addressed, are they effective and are they directly related to, necessary and fairly and reasonably related in scale and kind to the development? Are there physical or other constraints to development?*

The StQW Neighbourhood Forum has worked closely with the Old Oak Neighbourhood Forum, in the years since the Old Oak and Park Royal Development Corporation was established as a MDC in April 2015.

We are therefore very aware of the detail of OPDC's unsuccessful attempt from 2015-18 to partner with developers Cargiant/London and Regional Properties on a masterplan for 45 acres of Cargiant Land in the northern part of Hammersmith.

These plans for a new major town centre with 6,500 new homes at Old Oak North would have been created a new part of London adjacent to the Kensal Canalside Opportunity Area, across the borough boundary in North Hammersmith.

The envisaged construction of a new east/west road link (badged by OPDC as Wormwood Scrubs Street) would have fundamentally changed levels of vehicle access to Kensal Canalside. Residents in the proposed new developments at Kensal (that by Ballymore/Sainsburys and even more so for the Berkeley Homes/St William development) would have had road access to the west, linking in to Wood Lane/Scrubs Lane (the A129). This is the main north/south route through North Hammersmith, joining the A40 Westway and running southwards to the Thames.

While an east/west Wormwood Scrubs Street remains an aspiration for the OPDC, and is shown in diagrammatic form on maps in the 2022 OPDC Local Plan, such a piece of infrastructure (requiring a new tunnel beneath the West London Line) remains unfunded and uncommitted in the OPDC

Infrastructure Delivery Plan². OPDC's attention and focus shifted fundamentally in late 2019 to regeneration at 'Old Oak West'. This is an area which forms part of North Acton and East Acton, on the western side of Wormwood Scrubs and within LB Ealing.

At present, there are no firm plans for vehicular access to the HS2 station at Old Oak Common, currently under construction. The sole entry and exit at this rail interchange for buses, cars and taxis is to be in Old Oak Common Lane, at the western end of the 1km long station site. Completion of the station in 2028 will bring relatively little new transport connectivity to Kensal Canalside.

This lack of any firm and funded new proposals for improvement to the local road network has profound consequences for Kensal Canalside Opportunity area. The overall site remains landlocked on three sides, with resultant very low PTAL levels in the western half of the OA.

The OPDC claims to have worked closely with planning and transport officers in the three Boroughs of Brent, Ealing and Hammersmith & Fulham. In our experience liaison on transport issue has not been a feature of the 8 years of the life of the OPDC, not least because this body is not a Highways Authority.

Similarly we have seen little evidence of close working between RBKC and OPDC, in seeking solutions to the lack of road connectivity between the OPDC area and Kensal Canalside. The RBKC 2023 Duty to Cooperate Statement includes references to discussions with OPDC on Waste and on Tall Building, and on the Opportunity Areas at Kensal and Earls Court generally. But we see no evidence of joint work on realistic options for creating a western access point to Kensal Canalside OA.

The Statement of Common Ground agreed by RBKC with the Boroughs and with OPDC includes a paragraph 5.29 which reads *Where strategic or more localised cross border solutions for transport infrastructure are required, Kensington & Chelsea will work with our neighbours, as well as bodies such as Network Rail, TfL and Highways England to consider how these are best addressed.* But neither the OPDC Local Plan, nor the Draft RBKC Local Plan show evidence of feasibility work on joining up Scrubs Lane and the HS2 station site with the Kensal Canalside Opportunity Area.

This context is important to representations made by the StQW Forum (and many other parties including the Kensington Society) that the housing targets set for the Kensal Canalside OA are not justified.

Even after its 2019 'change of direction' the OPDC has continued to insist that the southern end of Scrubs Lane, where Mitre Bridge crosses the Grand Union Canal, will become as '*well connected location*'. Planning consents for high density/high rise residential developments at this location were granted planning consents from 2017 onwards, and continue to be 'optimised' via S73 or fresh applications (at densities of 450 dph and more).

A set of assumptions that similar densities can and should be carried through to Kensal Canalside has become embedded in recent years, within the OA allocations included in the 2021 London Plan and now in the RBKC NDLP.

In both cases these density levels and housing numbers have been derived from have turned out to be false assumptions. In the case of the OPDC Local Plan, an assumption that 'Old Oak North' would see a major new town centre and a new Overground station added to the West London Line at Hythe

² See OPDC 2021 Infrastructure Delivery Plan at [opdc_infrastructure_delivery_plan_2021_draft_021121_for_final_publish.pdf \(london.gov.uk\)](https://www.london.gov.uk/infrastructure/infrastructure-delivery-plan/infrastructure-delivery-plan-2021-draft-021121-for-final-publish.pdf) Project T4 page 17.

Road. In the case of the RBKC Local Plan the assumptions of an Elizabeth Line station at Kensal Canalside. Neither of these substantial public transport improvements is now going to happen. No firm plans have emerged for road connections across or beneath the barrier of the West London Line.

The relevant landholdings at the western end of Kensal Canalside remain owned by National Grid (north of the railway) and by DfT/Network Rail (south of the railway). We do not see evidence of substantive discussion with these bodies, either by RBKC officers or by the developers Ballymore/Sainsburys and Berkeley Homes/St William.

The fact that this geographic barrier runs along the boundary of three local planning authorities (RBKC, OPDC and LBHF which will eventually re-inherit the problem) has, in our view, counted against effective cross-boundary working on the issue. **We see this as a fundamental flaw in the adopted OPDC Local Plan and one that should not be compounded without major modification to the RBKC NDLP in relation to the quantum of development at Kensal Canalside. In our view Site Allocation Policy SA1 is neither justified nor effective.**

St Quintin and Woodlands Neighbourhood Forum

June 2023