

St Quintin and Woodlands Neighbourhood Forum

95 Highlever Road. London W106PW
email info@stqw.org
0207 460 1743
www.stqw.org

APPLICATION **PP/23/06575** CANAL WAY, SAINSBURYS AND FORMER UTILITIES LAND: SECOND OBJECTION FROM THE ST QUINTIN AND WOODLANDS NEIGHBOURHOOD FORUM AND ST HELENS RESIDENTS ASSOCIATION

Background

The Forum and the St Helens Residents Association have a joint membership of 380 local residents and a number of businesses in the northwest corner of RBKC. The neighbourhood area was designated by the Council in 2013 and lies to the immediate south west of the Kensal Canalside Opportunity Area,

We have been involved in consultations on proposals for Kensal Canalside for over a decade. This second objection follows on from that which we submitted in January 2024. It brings this up to date in terms of a revised submission made by the applicants in 2025 and other events impact on the key issue of lack of public transport access to the Kensington Canalside Opportunity Area.

Context of the application

Our views on the Ballymore/Sainsburys proposals have not changed. Given the geography of the Opportunity Area (with no vehicle access from the north, west or south and reliant on a sole entry/exit point on Ladbroke Grove) we consider the 7.6ha landholding for this proposed development to be wholly unsuitable for a high rise/high-density scheme as proposed.

Since submission of the application in 2023, no significant solutions to the lack of any further vehicle or pedestrian/cycle access to the site have been found. In terms of levels of access to public transport for future occupants of a high density development the position has worsened rather than improved (see further below).

Grounds for Refusal

Our previous objection identifies that the application fails to meet the following London Plan policies: **London Plan Policy SD1 B3, London Plan Policy D1 B2, London Plan Policy, SD1 B5 London Plan Policy D2, London Plan Policy D3**

The GLA Stage 1 assessment of the application commented that *Transport: Concerns are raised with the site access as it does not adequately cater for walking and cycling, and has adverse impacts on the highway network and on bus journey times. Significant contributions towards public transport are required, as well as additional information relating to the design of the Ladbroke Grove junction, car and cycle parking, active travel, internal and external movement strategy and freight.*

The application does not include a bridge from the site across the rail lines to the Network Rail land to the south, to provide a connection to Barlby Road. Safeguarding provision does not overcome the basic flaw in terms of lack of road access.

GLA assessment of the site and its status in the next London Plan

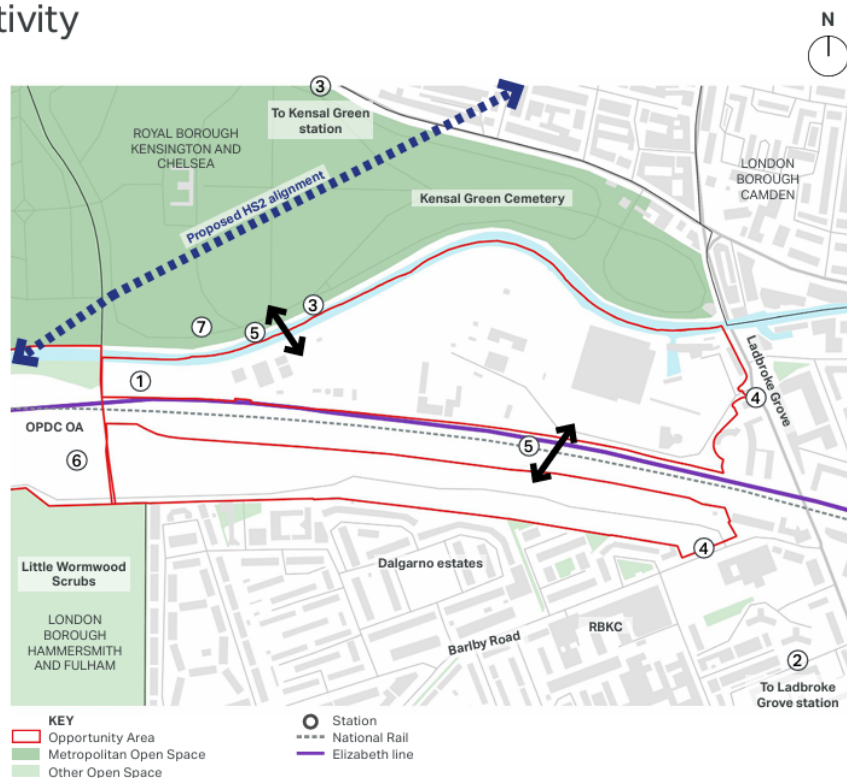
As part of consultation on the next London Plan, the GLA has published a series of ‘pen portraits’ on each of London’s 47 Opportunity Areas. Each analyses the key features of the area, including transport connectivity.

Given that there are now no plans for an Elizabeth Line station on the Opportunity Area, this GLA assessment is that *The OA is reliant on the delivery of a series of bridges to connect the north and the south part of the site allocation.* The section on Transport and Connectivity comments *Development (is) dependant on new cycling and walking bridge across the Great Western Railway (see below).*

We strongly concur with both these conclusions of the GLA. In terms of the GLA’s classification for the state of readiness for development of Oas, Kensal Canalside OA remains proposed as ‘nascent’ in the next London Plan (as opposed to ‘ready to grow’ or ‘underway’). Potential for GLA to intervene (to unlock the site) is noted, but no such interventions have been identified, led alone funded.

Kensal Canalside Transport and connectivity

- ① RBKC Local Plan safeguards land for a Crossrail station. This is currently unfunded.
- Station access:
 - ② Ladbroke Grove is a 16 minute walk from the entrance of the site but transport access from deeper within the site will be much longer.
 - ③ Kensal Green station, is equally close and potentially ‘closer’ subject to future planned bridges/ access provision.
- ④ Access to the site from the main road to the east.
- ⑤ Development dependant on new cycling and walking bridge across the Great Western Railway.
- ⑥ Opportunities to improve connections between OPDC and Kensal Canalside and safe access for pedestrian and cyclists on the shared route along the north of the site (along the canal).
- ⑦ Concerns about safety at night re access across cemetery.



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Relationship of the Kensal Canalside Area to the OPDC Opportunity Area

On a map, the two Opportunity Areas are adjacent. In reality they are separated by the West London Line (now the Mildmay Line) and its embankment. There is however a pedestrian/cycle connection via the southern canal path. This route has increasingly become a cycle commuter route and is very busy at peak hours. While cyclists are encouraged to make way for pedestrians, this is no longer the reality of cyclist behaviours in London.

Areas of non-compliance with the RBKC Local Plan were identified in our first objection. These relate to policies **T5A) and T5B)** requiring new development to be located in areas where sustainable transport requirements can be met and with PTAL scores of 4 or above where high trip generation is involved (as will be the case with high-density housing for 8-9,000 residents). Also non-compliance with **RBKC draft Policy T6** requiring *Improvements to the walking and cycling environment, including pedestrian and cycle links through new developments*.

RBKC Policy T8C on Car Parking requires: *All new additional residential development must be permit free. Car parking provided in new residential development must be at or below the adopted car parking standards. Parking in non-residential development must be for essential need only.*

The Ballymore/Sainsburys application has been designed to be substantively car-free other than parking for shoppers and disabled badge holders. The nearest Underground station is a minimum 16 minute walk (Ladbroke Grove).

What had until recently offered some prospect of improved access to public transport, within a plausible timescale, was access to the Elizabeth Line at Old Oak Common station (under construction). The timeline for completion of the HS2 project and opening of this rail interchange was 2029-33.

On June 19th 2025, the Secretary of State acknowledged to Parliament that no completion date for this national infrastructure project can be identified. A comprehensive 'reset' of the project is underway, but will take until the end of the year (or early 2026) for a revised programme and costs for HS2 to be clarified. Media reports have identified 2039 as a likely completion date.

The Elizabeth Line platforms at OOC station are inextricably tied in with the rest of the station design. At this stage there is no prospect of these becoming available earlier. Even if this outcome was to be achieved, pedestrian/cyclist access would be reliant on a convoluted ramped bridge from the southern canalside path. The distance involved is 900m from Mitre Bridge and significantly further from the Ballymore/Sainsburys site.

London Plan and Local Plan policies linking housing density to public transport access are not minor or trivial policies which can be set aside in the 'planning balance'. Creating car-free at high densities has a huge impact on quality of life of incoming residents. This is not ***the right development in the right place.***

On the above grounds, along with those in our January 2024 objection, we ask that application PP/23/06575 be refused.

St Quintin and Woodlands Neighbourhood Forum and St Helens Residents Association
June 23rd 2025