

Kensal Green Gasworks

1. PLANNING STATEMENT

JUNE 2025

Prepared by
DP9
on Behalf of St William

Developer	St William
Architect	Pilbrow & Partners
Archaeology	PCA
Community Engagement	Iceni Engagement
Daylight, Sunlight & Overshadowing	EB7
EIA	Temple
Energy, Sustainability & Overheating	Hodkinson
Fire Engineer	Introba
Heritage	Smith Jenkins
Land Contamination	Tetra Tech
Landscape Architect	Gillespies
MEP	Vector Design
Planning Consultant	DP9
Structural, Civil and Drainage Engineer	PTA
Transport and Waste	SLR
TVIA	Tavernor Consultancy
Visualisation	Rockhunter
Wind Engineering	RWDI

Kensal Green Gasworks

Planning Statement

July 2025

DP9 Ltd

DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ



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- Appendix 1.** Site Allocation SA1: Kensal Canalside Opportunity Area (RBKC Local Plan Review, adopted July 2024)
- Appendix 2.** Kensal Canalside Opportunity Area Indicative Height Strategy



1. Executive Summary

- 1.1 This Planning Statement has been prepared by DP9 Ltd on behalf of St William Homes LLP ('St William') (the "Applicant") in support of two applications including a hybrid planning application (i.e. part outline, part detail) for the residential-led redevelopment of the site known as Kensal Green Gasworks, and a full planning application for improvements to Canal Way (each referred to as 'St William Development Planning Application' and 'St William Canal Way Works Planning Application' respectively, and collectively as "the Proposed Development" hereafter).
- 1.2 Overall the St William Development Planning Application proposes a total of up to 91,955 sqm GEA of residential floorspace (Class C3) in addition to up to 890 sqm GEA of flexible Class E floorspace (both excluding basement).
- 1.3 The Detailed Component of the St William Development Planning Application proposes 25,792 sqm GEA of residential floorspace (Class C3) comprising 241 number of residential units, in two residential buildings (known as Blocks B and C) (Class C3), the provision for new pedestrian, cycle and vehicular access, open space, landscaping, car and cycle parking and other associated infrastructure works including remediation.
- 1.4 The Outline Component of the St William Development Planning Application comprises up to 74,450 sqm GEA of residential floorspace across four buildings (Blocks A, D, E and F) including ancillary residential facilities (Class C3), and non-residential floorspace which will comprise a small, two storey commercial unit envisaged as a café (Class E), and the provision of new pedestrian, cycle and vehicular access and open space.
- 1.5 The St William Development Planning Application is located on the site known as Plot 3 of the Kensal Canalside Opportunity Area Masterplan. The Kensal Canalside Opportunity Area (KCOA) represents the single largest development opportunity area in the Royal Borough of Kensington and Chelsea (RBKC) and is allocated in the RBKC Local Plan Review (adopted July 2024) under Site Allocation SA1: Kensal Canalside Opportunity Area. Appropriately optimising the housing delivery potential of the KCOA and meeting the objectives of the Site Allocation SA1 is a critical policy objective. Site Allocation SA1: Kensal Canalside Opportunity Area is set out in full in **Appendix 1**.
- 1.6 The Illustrative Masterplan forming part of the St William Development Planning Application identifies that 794 new residential homes could be delivered in total across the hybrid planning application.
- 1.7 This housing delivery will make a very significant contribution towards RBKC'S housing target, which under the adopted London Plan (March 2021) has a ten year housing



target of 4,480, equating to 448 per year. Under the latest Housing Delivery Test (published in December 2024), RBKC have delivered 855 homes in the last three years against a target of 1,361 equating to 63%. This results in the presumption in favour of sustainable development – as outlined in the National Planning Policy Framework (NPPF) (December 2024 version) - being applied.

- 1.8 In addition to providing much needed new homes in RBKC, the St William Development Planning Application provides a significant number of new affordable homes. The Illustrative Masterplan delivers Fast Track compliant levels of affordable housing comprising 35% affordable housing by habitable room, and a tenure split of 70% Social Rent homes and 30% Intermediate homes by unit number, or 80% Social and 20% Intermediate homes by habitable room.
- 1.9 Policy H5 Threshold Approach To Applications of the adopted London Plan states that the threshold level of affordable housing is “1) a minimum of 35; or, 2.) 50% for public section land and for Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites appropriate for residential uses where the scheme would result in a net loss of industrial capacity”. However, as outlined in Footnote 59 of the London Plan, some surplus utilities sites are subject to substantial decontamination, enabling and remediation costs. The London Plan sets out that if it is robustly demonstrated that extraordinary decontamination, enabling or remediation costs must be incurred to bring a surplus utilities site forward for development, then a 35% affordable housing threshold could be applied.
- 1.10 St William have demonstrated extraordinary costs for decontamination, enabling and remediation on the Site and therefore the 35% threshold for affordable housing applies to the St William Development Planning Application.
- 1.11 These proposals are the result of extensive and collaborative engagement with RBKC and the GLA throughout the pre-application process, with the design and housing offer being shaped by the feedback received from officers, the RBKC Quality Review Panel, key stakeholders and community engagement. The proposals have also been designed to ensure an integrated masterplan across the wider KCOA following collaborative dialogue with the neighbouring Ballymore/Sainsburys development (which is subject to a separate planning application).
- 1.12 The public benefits arising from the Proposed Development are substantial and are set out overleaf in terms of the social, economic and environmental benefits.



Social Benefits

- Delivery of much needed new high quality homes. In addition, the delivery of a significant number of new affordable homes including 35% affordable housing by habitable room and a tenure split, which will significantly aid RBKC in addressing their acute housing need, in addition to contributing to London's housing need more widely;
- An affordable housing mix is proposed that aligns with RBKC's Local Housing Needs Assessment (dated September 2022)
- Significant new high quality open space and improvements to local pedestrian and cycle movement, all available to local residents;
- Localised expenditure in shops, food and beverage establishments;
- Local training, skills and employment opportunities during construction.

Economic Benefits

- Delivery of high quality, flexible commercial space on site, intended to operate as a local café, which will support the local economy;
- A significant package of Community Infrastructure Levy and Section 106 financial contributions to mitigate the impacts of the development and deliver local community benefit;

Environmental Benefits

- Development of a brownfield site in an Opportunity Area allocated for development through a design and landscape led approach to optimise the delivery of new homes and create exemplar new buildings and public realm;
- Significant landscaping which will provide ecology and biodiversity benefits to the immediate site and wider area;
- Site wide Urban Greening Factor of 0.4, in line with London Plan requirements;
- High quality dwellings including genuinely affordable homes with private amenity space and communal landscaping;
- A car-free scheme, except accessible car parking, to encourage a shift towards a more sustainable travel measures.



- 1.13 In conclusion, it is clear that both planning applications (the St William Development Planning Application and the St William Canal Way Works Planning Application respectively) offer very significant planning public benefits and fully accord with all aspects of the prevailing planning policy framework, and should therefore be approved without delay in accordance with the tilted balance created by the presumption in favour as outlined in the National Planning Policy Framework (NPPF) (December 2024).



2. Introduction

2.1 This Planning Statement has been prepared by DP9 Ltd on behalf of St William Homes LLP ('St William') (the "Applicant") in support of two planning applications, one hybrid planning application and one detailed application submitted to the Royal Borough of Kensington and Chelsea ('RBKC'), in relation to the redevelopment of land known as Kensal Green Gasworks or Plot 3 of the Kensal Canalside Opportunity Area Masterplan ('KCOA').

2.2 The hybrid planning application, referred to as the 'St William Development Planning Application', seeks planning permission for the following description of development:

"Hybrid application for the phased redevelopment of Plot 3 of the masterplan site through demolition of all above ground existing buildings and structures, site remediation, and creation of residential floorspace (Use Class C3) and flexible ground floor commercial, business and service floorspace (Use Class E), in buildings ranging in height up to 31 storeys (maximum 98 metres from ground), with associated public realm and infrastructure works, comprising:

- Outline proposals for residential floorspace including ancillary residential facilities (Use Class C3) (up to 74,450 sqm GEA) and flexible commercial, business and service floorspace (Use Class E) (up to 890 sqm GEA), new pedestrian, cycle and vehicular access, open space, landscaping, car and cycle parking, infrastructure and associated works; and,*
- Detailed proposals for residential floorspace (Use Class C3) (25,792 sqm GEA) new pedestrian, cycle and vehicular access including bus route and associated facilities, open space, landscaping, car and cycle parking, infrastructure and associated works".*

2.3 Full planning permission for the detail application at Canal Way, referred to as the 'St William Canal Way Works Planning Application', is sought for:

"Public realm, landscaping and highway improvement works to Canal Way, including works to Ladbroke Grove / Canal Way junction, and associated works".

2.4 The two planning applications will be referred to collectively as "the Proposed Development".



Background to the Proposed Development

- 2.5 The Kensal Canalside Opportunity Area (KCOA) represents the single largest development opportunity area in RBKC. The area is allocated under the RBKC Local Plan Review (adopted July 2024) under Site Allocation SA1: Kensal Canalside Opportunity Area, and therefore appropriately optimising the development potential of the KCOA and meeting the objectives of the Site Allocation SA1 is critical. RBKC's Local Plan Review attributes a significant proportion of its housing delivery within the next 20 years to the re-development of this key Opportunity Area.

Proposed Application Structure

- 2.6 As set out in the Executive Summary above, St William own the site known as 'Kensal Green Gasworks' or 'Plot 3' which comprises a total of 3.61 acres, and lies adjacent to the Ballymore-Sainsbury's site (live application LPA ref. PP/23/06575).
- 2.7 St Wiliam, Ballymore and Sainsbury's have agreed a Collaboration Agreement to enable the re-development of the Kensal Canalside Opportunity Area Masterplan. The Collaboration Agreement means there is a unique opportunity to realise a comprehensive development across multiple land holdings and the significant wider public benefits that arise including new private and affordable homes, public open space and commercial and community facilities.
- 2.8 The Collaboration Agreement is structured to enable the redevelopment of the northern parcel of the KCOA in 2 scenarios:
1. A comprehensive redevelopment including the redevelopment of both Ballymore Sainsbury's proposals and St William's Site together (known as the "St William Masterplan Scenario")
- or,
2. St William re-developing the Site through the Standalone scenario, but critically in a manner that does not prohibit the later delivery of the Ballymore Sainsbury's development (hereafter known as the "St William Standalone Scenario").
- 2.9 The clear aspiration of St William, Ballymore and Sainsbury's is to deliver the St William Masterplan Scenario, and therefore a comprehensive redevelopment of the KCOA. However, St William always require the ability to deliver the St William Standalone Scenario in the event the Ballymore Sainsbury's live application does not come



forward, or in the case that St William's proposals come forward before the Ballymore Sainsburys development.

- 2.10 For the avoidance of doubt, there is no proposed difference in the housing provision, design or scale of the buildings between the Masterplan Scenario and the Standalone Scenario. The only difference between scenarios is how the St William Development Planning Application will be accessed, and whether works to the landscape to facilitate the proposed bus infrastructure on the St William Site will be delivered or not.

Planning Statement Structure

- 2.11 The purpose of the Planning Statement is to assess the planning considerations associated with the Proposed Development in the context of national, regional and local planning policy and guidance. The Planning Statement comprises the following:
- **Chapter 3:** describes the Site and surrounding area.
 - **Chapter 4:** describes the planning history of the Site.
 - **Chapter 5:** summarises the engagement process undertaken prior to the submission of the planning applications.
 - **Chapter 6:** provides a description of the Proposed Development.
 - **Chapter 7:** sets out the planning policy framework on which the Proposed Development is assessed.
 - **Chapter 8:** assesses the Proposed Development against relevant planning policy and guidance considerations.
 - **Chapter 9:** sets out Section 106 ("S106") Agreement Draft Heads of Terms and Community Infrastructure Levy ("CIL") considerations.
 - **Chapter 10:** provides the conclusions of this Planning Statement.

Content of the Planning Applications and Environmental Impact Assessment Scoping

- 2.12 This Planning Statement should be read and considered in conjunction with the suite of planning application documents and drawings out in the Planning Application documents and drawing schedules that have been submitted with the hybrid planning application and detailed planning application. These are outlined in Paragraph 2.14 of this Statement below.



2.13 Due to the scale and nature of the St William Development Planning Application, an Environmental Impact Assessment (“EIA”) has been formally scoped and undertaken in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

2.14 The application’s supporting documents are as follows:

St William Development Planning Application

- **Application form, fee and certificates**, prepared by St William and DP9;
- **Covering Letter**, prepared by DP9;
- **Suite of drawings**, including:
 - Location and site plans, prepared by Pilbrow and Partners
 - Parameter plans, prepared by Pilbrow and Partners
 - Proposed plans, prepared by Pilbrow and Partners
 - Proposed landscaping plans, prepared by Gilliespies
- **Planning Statement (including draft S106 HoTs and Affordable Housing Statement)**, prepared by DP9;
- **CIL Form**, prepared by St William and DP9;
- **Statement of Community Involvement**, prepared by Iceni;
- **Community Space Audit**, prepared by Temple;
- **Development Specification Document**, prepared by DP9;
- **Design & Access Statement (including an inclusive design statement)**, prepared by Pilbrow and Partners
- **CGIs**, prepared by Pilbrow and Partners
- **Townscape and Visual Impact Assessment**, prepared by Tavernor Consultancy;
- **Heritage Statement**, prepared by Smith Jenkins;
- **Archaeology Assessment**, prepared by PCA;
- **Daylight, Sunlight and Overshadowing**, (including solar glare Assessment), prepared by eB7;
- **Preliminary Risk Assessment**, prepared by Tetra Tech;
- **Flood Risk Assessment**, prepared by PTA Consult;
- **Drainage Strategy (including SuDS)**, prepared by PTA Consult;
- **Integrated Water Management Strategy**, prepared by PTA Consult;
- **Tree Survey / Arboricultural Impact Assessment**, prepared by Temple;
- **Ecological Impact Assessment**, prepared by Temple;
- **Biodiversity Net Gain Assessment**, prepared by Temple;
- **Energy Assessment**, prepared by Hodkinsons;
- **Sustainability Statement**, prepared by Hodkinsons;



- **Overheating Assessment**, prepared by Hodkinsons;
- **Whole Life Cycle Carbon Assessment**, prepared by Hodkinsons;
- **Circular Economy Statement**, prepared by Hodkinsons;
- **Construction Environmental Management Plan**, including :
 - Construction Logistics Plan, prepared by St William
 - Construction Traffic Management Plan, prepared by St William
 - Project Waste Management Plan, prepared by St William
- **Delivery and Servicing Plan**, prepared by SLR;
- **Transport Assessment (including a Travel Plan)**, prepared by SLR;
- **Operational Waste Management Plan**, prepared by SLR;
- **Fire Statement**, prepared by Introba;
- **Qualitative Design Report**, prepared by Introba; and,
- **Environmental Statement**, including the following chapters:
 - Traffic and transport
 - Socio economics
 - Air Quality
 - Noise and Vibration
 - Ground Conditions and Contamination
 - Daylight, Sunlight and Overshadowing, Light Pollution and solar glare
 - Townscape, Visual Impact and Heritage Assessment
 - Built Heritage
 - Wind Microclimate
 - Climate and Greenhouse Gases
 - Ecology
 - Effect Interactions
 - Residual Effects and Conclusions
 - Separate volume on Townscape, Visual Impact and Heritage Assessment.

St William Canal Way Works Application

- **Application form, fee and certificates**, prepared by St William and DP9;
- **Covering Letter**, prepared by DP9;
- **Suite of drawings**, including:
 - Proposed plans, prepared by SLR
 - Proposed landscaping plans, prepared by Gilliespies
- **CIL Form**, prepared by St William and DP9; and,
- **Biodiversity Net Gain Assessment**, prepared by Temple and included within the Environmental Statement as outlined above.



2.15 The following documents have been submitted in support of the application at Canal Way Works Planning Application (ref. PP/25/03536), which have been included within the submission for hybrid planning application at the site known as Former Kensal Gas Works, Canal Way, London, W10 (ref. PP/25/03535).

- **Planning Statement (including draft S106 HoTs and Affordable Housing Statement)**, prepared by DP9 – reference to Canal Way Works application throughout;
- **Statement of Community Involvement**, prepared by Iceni – reference to Canal Way Works application throughout;
- **Community Space Audit**, prepared by Temple – reference to Canal Way Works application throughout;
- **Tree Survey / Arboricultural Impact Assessment**, prepared by Temple – reference to Canal Way Works application throughout;
- **Biodiversity Net Gain Assessment**, prepared by Temple – reference to Canal Way Works application throughout;
- **Environmental Statement**, prepared by Temple – reference to Canal Way Works application throughout (most relevant for the Canal Way Works application is Chapter 8. Air Quality; Chapter 10. Wind Microclimate; Chapter 12. Ground Conditions)
- **Design and Access Statement**, prepared by Pilbrow and Partners - reference to Canal Way Works application throughout (but specifically in Chapter 11. Development Scenarios, page 214);
- **Archaeology Assessment**, prepared by PCA – reference to Canal Way Works application throughout;
- **Land Contamination Assessment**, prepared by Tetra Tech – reference to Canal Way Works application throughout;
- **Flood Risk Assessment and Drainage Strategy**, prepared by PTA Consult – reference to Canal Way Works application throughout;
- **Construction Environmental Management Plan**, including: Construction Logistics Plan, prepared by St William – reference to Canal Way Works application throughout;
- **Delivery and Servicing Plan**, prepared by SLR – reference to Canal Way Works application throughout;
- **Transport Assessment (including a Travel Plan)**, prepared by SLR – reference to Canal Way Works application throughout;
- **Fire Statement**, prepared by Introba – reference to Canal Way Works application throughout.



3. Site Context

- 3.1 This chapter outlines the details of the existing Site and its surrounding context.
- 3.2 The Kensal Canalside Opportunity Area is the largest brownfield site in RBKC. It lies in close proximity to Old Oak and Park Royal Opportunity Area to the west. The KCOA consists of the former Kensal Green Gasworks north of the railway line and the North Pole railway depot to the south. Part of the northern site is currently occupied by a Sainsbury's supermarket and petrol station. The Kensal Canalside site is bounded by the Grand Union Canal with the Kensal Green Cemetery to the north.
- 3.3 The St William Site known as 'Plot 3', and the St William Development Area extends to 3.361 acres and is bounded by the Grand Union Canal to the north, and land owned by Ballymore and Sainsbury's proposed for redevelopment to the east and south.
- 3.4 The Site does not include any existing buildings. There are three small structures – a substation and two small electrical switch rooms to the south east which are to be relocated as part of the development.
- 3.5 The Site does not include any listed building and is not located within a Conservation Area.
- 3.6 The Site is, however, in close proximity to the Kensal Green Cemetery which lies adjacent to the Site, just north of the canal. Kensal Green Cemetery is a Conservation Area and is a Grade I Registered Park and Garden contains a number of listed buildings and structures including: The Anglican Chapel (Grade I Listed), Dissenters Chapel (Grade II* Listed) and The Northern Colonnade (Grade II Listed).
- 3.7 The land adjacent to the Site to the west is owned by Cadent and houses a Pressure Reduction Station (PRS). The PRS is an essential part of the remaining operational gas equipment.

The Surrounding Area

- 3.8 The area surrounding the Site is predominately mixed in nature, with a Sainsbury's superstore and various industrial uses adjacent to the site to the east; a railway line to the immediate south and the west; and the Grand Union Canal and Kensal Green Cemetery to the north.



- 3.9 The majority of the Site is surrounded by temporary commercial uses, most of which are currently being used for storing vehicles, including hire cars, buses and limousines. These units are located on the adjacent land owner's site and will be removed as part of the wider comprehensive development of the KCOA.

Heritage Context

- 3.10 As above, there are no heritage assets within the application Site, however, there are a number of designated heritage assets within the surrounding area which have the potential to be impacted by development proposals, including but not limited to the Grade I listed Anglican Chapel, the Grade II* listed Entrance Gateway to Kensal Green, the Grade II* listed Dissenters Chapel, all located with the Kensal Green Cemetery adjacent to the Site, on the other side of the Grand Union Canal. In total, 170 listed funerary monuments exist within Kensal Green Cemetery.

Accessibility

- 3.11 The Site has a PTAL (Public Transport Accessibility Level) of between 0-2. However, as outlined below, the site benefits from good accessibility to a number of public transport provisions and as outlined in the Transport Assessment, PTAL methodology suffers from a significant number of weaknesses.
- 3.12 The Site is approximately 1.4km from Kensal Green Underground Station to the north which offers frequent services via the Bakerloo Line and the Overground (Lioness branch). The Site is also an estimate 1.5km from Ladbroke Grove Underground Station to the south of the Site, which has tube services via the Circle and Hammersmith and City Lines.
- 3.13 The existing Site is located a short distance from several bus stops. For example, there are 7 bus routes located approximately 500m from the Site, including Barlby Gardens Stop P, which on TfL bus route 70 runs services from South Kensington to Chiswick; the 295 bus route which runs to Clapham Junction; and the 316 route, which runs to White City. In addition, Kensal Green Cemetery (Stop W) in close proximity offers bus services on TfL route 18 from Sudbury to Harrow Road Station. The Site is also a short walking distance from TfL's 23 bus route which runs between Westbourne Park station and Aldwych.
- 3.14 In addition to the above, the bus stop at Ladbroke Grove Sainsbury's offers several bus routes including routes 70, 316 and 23 as mentioned above, but also the 228 route to Maida Hill; the 52 to Willesden Bus Garage, and the 452 to Vauxhall.



- 3.15 The Site currently lacks pedestrian and cycle infrastructure and acts as a barrier to movement in the immediate vicinity of the Site, which is addressed comprehensively in the application.

Proximity to Local Amenities

- 3.16 As aforementioned, the Site is located close to several shops including Sainsbury's adjacent to the Site, which under the live planning application (LPA ref. PP/23/06575) is proposed to be re-provided within the wider Kensal Canalside Site. In addition, the Site is located a short distance from a variety of shops on Ladbroke Grove and north towards Kensal Green.



4. Planning History

- 4.1 This chapter sets out a summary of the planning history of most relevance to the Site.
- 4.2 The Site known as Kensal Green Gasworks was originally land owned by Sir George Talbot before it was bought by the Western Gas Company in 1845. The Site was later bought by the Gas Light and Coke Company in 1872, and by 1896 the gasworks occupied all of the land to the west of Ladbroke Grove between the railway and the canal.
- 4.3 In 1970, the gasworks closed. This was a result of increased technological changes in the storage of gas to underground mains which resulted in gasholders being redundant.
- 4.4 In October 2021, an EIA (Environmental Impact Assessment) scoping opinion request was submitted to the Council (LPA ref. EIA/21/06482), and later in November 2021 RBKC issued a scoping opinion that advised the St William Development Planning Application would require an EIA.
- 4.5 There is extensive planning history associated with the Site, the majority of which is associated with the previous function of the Site for gas works. We provide a summary of the relevant planning permissions in **Table 1. Planning History** below, which date back to 2000.
- 4.6 The most relevant planning permission is LPA ref. PA/18/06110, approving the demolition and dismantling of the gas holders, which has been completed.

Table 1. Planning History

Reference	Description of Development	Status
EIA/21/06482	Request for Scoping Opinion for a residential-led mixed use development between 650 - 750 homes, with some commercial uses at ground level (likely to comprise a cafe and flexible residents' facilities and some sui generis uses), provision of limited car parking within a basement, open space, landscaping, and access to the Grand Union Canal. Development to comprise a number of	Decision Issued 24.11.20221



	buildings ranging in height from approx. 10-18 storeys with one taller building of maximum 37 storeys	
PA/18/06110	Demolition/dismantling of two existing redundant gasholders together with 5 no. associated redundant structures (antifreeze building, Transco buildings, electrical switch room, eastern generator, and western generator) and redundant lighting standards.	Approved 30.10.2018
PP/17/06990	Request for revocation of existing hazardous substances consent for former Kensal Green Gas Holders.	Approved 27.02.2018
PP/14/01294	Removal of condition 4 (provision of cycle storage prior to occupation) of planning permission 13/06638 due to substation being unmanned with no public access.	Approved 25.04.2014
PP/13/06638	Erection of substation amenity building.	Approved 29.01.2014
PP/11/00684	Temporary use for three years of part of site for two open storage contractors' yards with ancillary office space and car parking (Use Class B8).	Refused 16.06.2011
PP/10/02179	Erection of four buildings comprising a gas insulated switchgear electricity substation, 2 headhouses, control building and communications mast, (all required in connection with permitted development works to construct electricity cable tunnels and shafts) together with electricity transformers and associated equipment.	Approved 23.03.2011
TP/97/02707	Provision of 15,989 sq.m. of Class B1 (Business) accommodation, and 308 residential units together with restaurant and cafe facilities and associated car parking together with highway improvements, reconfiguration of canal basin and provision of ecology garden.	Approved 21.01.2002



- 4.7 Adjacent to the Site, an outline planning application (LPA ref. PP/06/01619) was submitted in 2006 which sought the following:

“790 residential units, 9 residential moorings, 14,489sqm non-residential uses including business, and employment, work/live, retail (Class A1-A4), leisure, and community uses and associated car parking together with highways improvements, a new inner canal basin and recognised outer canal basin and the provision of an ecology garden”.

- 4.8 The application was later negotiated to 730 units, but withdrawn in 2008 following a change in site ownership.

- 4.9 In November 2023, Ballymore and Sainsbury’s submitted a hybrid application (LPA ref. PP/23/06575) for:

“Hybrid application for the redevelopment of Plots 1, 2, 4, 5 and 6 of the masterplan site through demolition of all existing buildings and structures (including supermarket, car park and petrol filling station (Use Class E), office building (Use Class E), community, sports and housing building (Use Class F2 and Use Class C3), and gas governor (sui generis)) and creation of a mixed-use development of residential, retail, commercial, and community uses (up to 339,458.9 sq.m GEA), in buildings ranging in height up to 29 storeys (maximum 98 metres from ground), with associated public realm and infrastructure, comprising:

- Outline proposals for residential floorspace (up to 290,913.5 sq.m GEA and 2,519 homes) and ancillary facilities (Use Class C3) and non-residential floorspace (up to 15,950 sq.m GEA) comprising flexible commercial (Use Class E), community (Use Class F2) and sui generis floorspace, the provision of new pedestrian and vehicular access, open space, landscaping, car and cycle parking and other associated infrastructure works; and*
- Detailed proposals for a supermarket (Use Class E(a)) and ancillary facilities (23,248.9 sq.m GEA), ground floor commercial, business and service units (Use Class E) (732.7 sqm GEA), leisure floorspace (Use Class E(d)) (369.3 sq.m GEA), residential facilities (Use Class C3) (8,244.5 sq.m GEA), improvements to existing site access at Ladbroke Grove, provision of new pedestrian and vehicular access, internal roads and associated landscaping, car and cycle parking and associated infrastructure works including remediation”.*



4.10 Since the application's submission, in April 2025 Ballymore submitted to the Council a detailed response to the planning application feedback received to date. A brief summary of what the amendments primarily relate to is provided below:

- The submission of a revised Fire Statement for Plot 2 / Side Wide Fire Design Note;
- Parameter Plan changes relating to change between boundary of outline and detailed component relating to public realm, plus minor changes clarifying building heights relating roof plant, amendments to pedestrian and cycle routes, active frontages, public realm and site levels;
- Design code amendments, including housing quality and public realm; and,
- Amendments to Ladbroke Grove junction subject to workshops with TfL and RBKC, and subject to further Road Safety Audits.



5. Pre-Application Discussion and Public Consultation

5.1 St William, and the Applicant Team, have had an extensive pre-application process of over four years which began with an initial inception meeting in October 2020. The pre-application process to date has included numerous engagements with the community, stakeholder groups, the Quality Review Panel (QRP), Developer Forums, Historic England (HE) and the Canal & Rivers Trust (CaRT), as well as engagement with Greater London Authority (GLA) and frequent pre-application meetings with RBKC officers.

5.2 This section does not set out all feedback received during the pre-application process but instead provides a summary of the consultation process undertaken, including the pre-application engagement process with RBKC, the GLA, TfL, Historic England and other statutory consultees.

EIA Scoping Request

5.3 As part of the pre-application engagement process and due to the scale and nature of the St William Development Planning Application, an Environmental Impact Assessment (“EIA”) has been formally scoped and undertaken in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and an Environmental Statement (“ES”) is submitted as part of the applications.

5.4 A formal request for an EIA scoping opinion was submitted to RBKC in October 2021 (LPA Ref. EIA/21/06482), and the Council later issued their opinion in November 2021 which confirmed an EIA would be required.

Mayor of London Referral

5.5 The hybrid application is referable to the Mayor of London as the St William Development Planning Application exceeds the relevant thresholds set out in The Town and Country Planning (Mayor of London) Order 2008. Accordingly, the GLA has been involved in formal pre-application discussions with both the Applicant and RBKC.

Pre-application Engagement

5.6 As outlined above, the applicant team have been in pre-application discussions with RBKC since October 2020. Meetings to date have covered a plethora of the key matters of the proposed scheme including but not limited to the following:

- Height and Massing



- Scheme Design
- Heritage
- Affordable Housing Quantum and Mix
- Transport
- Landscaping
- Residential Quality
- Energy and Sustainability
- Fire
- Planning Application Structure and Controls
- St William Standalone Development Scenario and Canal Way Works

5.7 As a result of the extensive pre-application process, the proposals have been updated significantly since October 2020 and the latest proposed development aims to respond to the Council's pre-application feedback to date. Further details of the proposals' iterations as a result of pre-application feedback can be found within the Design and Access Statement, prepared by Pilbrow and Partners, which is submitted under separate cover.

Quality Review Panel Engagement

5.8 Similar to the above, the applicant team have engaged in several discussions with RBKC's QRP between December 2020 and January 2025. Key discussions between the applicant and QRP centred on, but were not limited to, the following matters:

- Design, including architectural style and quality;
- Height and massing
- Heritage and townscape
- Residential accommodation;
- Landscaping and open space;
- Connectivity;
- Daylight and sunlight;
- Cycle provision and sustainable transport methods;
- Sustainability; and,
- The two development scenarios (the Masterplan Scenario, and the Standalone Scenario)



Community and Stakeholder Engagement

5.9 Full details of the Proposed Development's consultation undertaken with the local community can be found within the submitted SCI, prepared by Iceni. The summary below sets out the key elements of community engagement to date:

- Phase 1 – 2021:
 - A dedicated consultation website and online feedback forms;
 - An email and telephone number to receive feedback and any enquiries about the proposals;
 - 2 leaflet drops, to over 16,000 local residents and businesses, outlining the 2021 proposals, directions to the website and details about the July 2021 and September 2021 consultation events;
 - Mailing list updates;
 - 4 in person public consultation events held in the car park of Sainsbury's on Canal Way providing the opportunity to speak with the technical experts on the project team about the proposals;
 - Meetings with community stakeholders and political stakeholders; and
 - Attendance at the Developer Forum.

- Phase 2 – Across 2024 and 2025:
 - A dedicated consultation website with online feedback forms, the live website for the application can be found here: <https://kensalgasworks.com/>;
 - An email and telephone number to receive feedback and any enquiries about the proposals;
 - Ongoing mailing list updates;
 - 7 in person public consultation events held locally, providing the opportunity to speak with the technical experts on the project team about the proposals;
 - Meetings with community stakeholders such as The Kensington Society, Kensal Triangle Residents Association, General Cemetery Company and political stakeholders; and,
 - A presentation at the Development Forum.

5.10 St William and the Applicant Team will continue to engage with the public, stakeholder groups, the Council and the GLA through the application's determination and beyond.



6. Application Proposals

- 6.1 This section provides a brief summary of the key planning policies relevant to the two applications coming forward on the Site.

Description of Development

- 6.2 The hybrid planning application (the St William Development Planning Application) seeks planning permission for the following:

“Hybrid application for the phased redevelopment of Plot 3 of the masterplan site through demolition of all above ground existing buildings and structures, site remediation, and creation of residential floorspace (Use Class C3) and flexible ground floor commercial, business and service floorspace (Use Class E) in buildings ranging in height up to 31 storeys (maximum 98 metres from ground), with associated public realm and infrastructure works, comprising:

- Outline proposals for residential floorspace including ancillary residential facilities (Use Class C3) (up to 74,450 sq.m GEA) and flexible commercial, business and service floorspace (Use Class E) (up to 890 sq.m GEA), new pedestrian, cycle and vehicular access, open space, landscaping, car and cycle parking, infrastructure and associated works; and,*
- Detailed proposals for residential floorspace (Use Class C3) (25,792 sq.m GEA) new pedestrian, cycle and vehicular access including bus route and associated facilities, open space, landscaping, car and cycle parking, infrastructure and associated works”.*

- 6.3 Full planning permission is sought for the following improvement works to Canal Way (the St William Canal Way Work Planning Application):

“Public realm, landscaping and highway improvement works to Canal Way, including works to Ladbroke Grove / Canal Way junction, and associated works”.

- 6.4 The Design and Access Statement, prepared by Pilbrow and Partners has been prepared in accordance with Article 9 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended), and this sets out the proposals relating to both planning applications in full.



Overview of the proposals

- 6.5 As aforementioned, the Proposed Development comprises two applications including a hybrid planning application for the residential-led redevelopment of the site known as Kensal Green Gasworks (St William Development Planning Application), and a detailed application for improvements to Canal Way (St William Canal Way Works Planning Application).
- 6.6 The Detailed Component of the St William Development Planning Application includes two residential buildings (Blocks B and C) and ancillary residential facilities (Class C3) which comprises 241 residential units. The Detailed Component of the scheme will also include the provision of new pedestrian, cycle and vehicular access, high quality public open space and landscaping, and car and cycle parking.
- 6.7 The Outline Component of the St William Development Planning Application includes residential floorspace across four buildings (Blocks A, D, E and F) and ancillary residential facilities (Class C3), and non-residential floorspace which will comprise a small, two storey commercial unit envisaged as a café (Class E), and the provision of new pedestrian, cycle and vehicular access and open space.
- 6.8 The St William Development Planning Application is submitted with supporting documents including a Development Specification, Design Code and Parameter Plans which act as control documents that future Reserved Matters Applications under the Outline Component will need to comply with.
- 6.9 The Outline Component of the St William Development Planning Application seeks approval for up to 74,450 sqm GEA of residential floorspace to be delivered within the context of the control documents (the Development Specification, Design Code and Parameter Plans).
- 6.10 An Illustrative Masterplan has been prepared which demonstrates one way in which the Detailed Component and the Outline Component may come forwards based on the control document.
- 6.11 The Illustrative Masterplan results in c.794 homes, comprising 241 units in the Detailed Component and 553 units in the Outline Component, including 35% affordable housing across the site.
- 6.12 In order to ensure 'worst case' impacts are assessed, a 'Maximum Scenario' has also been prepared based on the maximum areas and parameters set out in the control documents, which results in c.896 homes, comprising 241 homes in the Detailed



Component and 650 homes in the Outline Component. In addition to the Illustrative Masterplan, the 'Maximum Scenario' is tested in the EIA and other relevant documents.

- 6.13 The final detailed proposals for the Outline Component including the final number of homes will be decided at future Reserved Matters Application stage.
- 6.14 As aforementioned, the Proposed Development also includes a full planning application for the public realm, landscaping and highways improvements to Canal Way, including works with Ladbroke Grove / Canal Way junction required in at St William Standalone Development Scenario only.

Design including Height and Massing

- 6.15 The proposals for the Kensal Green Gasworks Site have been developed following extensive pre application advice from RBKC planning officers, GLA, Historic England and Transport for London and in collaboration with the adjacent landowners, Ballymore and Sainsbury's, and their master planner Faulkner Brown Architects to deliver a coherent masterplan version.
- 6.16 The scale and massing of the Proposed Development has been discussed at length in pre application meetings and is designed to sit comfortably within the surrounding townscape whilst fully optimising the Site through the design led approach and ensuring both the distribution of height and the tallest elements of the site are compliant with planning policy.
- 6.17 The Proposed Development comprises five mansion block scale buildings which frame a large, central public garden. The tallest buildings proposed are located away from the northern boundary of the Site which sits adjacent to the canal and several listed assets in the Kensal Green cemetery in line with policy. The height of the canal side buildings align with those proposed to the east of the Plot 3, within Ballymore and Sainsbury's live application, and masterplan for the Site It is acknowledged that the canalside building heights exceed planning policy however the distribution in height has been extensively studied to ensure the optimal balance of delivering high quality homes including affordable homes, open space and harm to heritage assets.
- 6.18 The Proposed Development includes a 31 storey tower which marks the western entrance into the KCOA. The proposed height of the tall building is policy compliant and the design accords with the adjacent tower proposed within the Ballymore and Sainsbury's live application, which helps create a coherent and consistent townscape.



- 6.19 Further details of the proposal's height and massing can be found in the Design and Access Statement, which is submitted under separate cover.

Architecture

- 6.20 The Proposed Development comprises buildings which are a contemporary interpretation of traditional Kensington & Chelsea mansion block buildings. These buildings will utilise modern methods of construction, ensuring compliance with latest regulatory standards and guidance and celebrating the Site's unique setting by enhancing views of the canal and cemetery. The proposal's primary façade material is brick, utilising a variety of colours, finishes and bonds to emphasise a tripartite organisation common to traditional mansion blocks across RBKC.

Residential Accommodation and Quality

- 6.1 As explained above, the St William Development Planning Application seeks hybrid planning permission comprising 241 homes in the Detailed Component and up to 74,450 sqm GEA of residential floorspace in the Outline Component to be delivered within the context of the control documents (the Development Specification, Design Code and Parameter Plans).
- 6.2 An Illustrative Masterplan has been prepared which demonstrates one way in which the Detailed Component and the Outline Component may come forwards based on the control document. The Illustrative Masterplan results in c.794 residential dwellings (under Use Class C3) as a mix of studio, 1 bed, 2 bed, 3 bed and 4 bed homes. The homes will comprise of a mix of tenures split between market, intermediate and social rent. The affordable housing mix proposed within the Illustrative Masterplan has been designed to deliver a significant number of family homes and to respond to RBKC's Housing Needs Assessment 2022 as requested during pre app. Please see **Table 2. Proposed Accommodation Summary (Illustrative Scheme)** below for further detail on the dwelling mix and tenure split across the Illustrative Masterplan.

Table 2. Proposed Accommodation Summary (Illustrative Scheme)

Market Accommodation (65% by habitable room)		
Unit Type	Description	Number of Units
Studio	1 bed 1 person	139
1 Bed	1 bed 2 person	188
2 Bed	2 bed 3 person	0
	2 bed 4 person	213
3 bed	3 bed 5 person	44



4 bed	4 bed 6 person	0
TOTAL		584

Affordable Accommodation (35% by habitable room)		
London Living Rent		
Unit Type	Description	Number of Units
Studio	1 bed 1 person	0
1 Bed	1 bed 2 person	40
2 Bed	2 bed 3 person	24
	2 bed 4 person	0
3 bed	3 bed 5 person	0
4 bed	4 bed 6 person	0
TOTAL		64
Social Rent		
Unit Type	Description	Number of Units
Studio	1 bed 1 person	0
1 Bed	1 bed 2 person	3
2 Bed	2 bed 3 person	45
	2 bed 4 person	24
3 bed	3 bed 5 person	26
4 bed	4 bed 6 person	48
TOTAL		146
AFFORDABLE TOTAL		210

6.3 The above table sets out the proposed accommodation summary for the Illustrative Masterplan only. Final details of the Outline Component of the hybrid planning application will be decided at future Reserved Matters Application stage.

6.4 In order to ensure 'worst case' impacts are assessed, a 'Maximum Parameter' scenario has also been prepared based on the maximum areas and parameters set out in the control documents, which results in c.896 homes, comprising 241 homes in the Detailed Component and 650 homes in the Outline Component. In addition to the Illustrative Masterplan, the 'Maximum Scenario' is tested in the EIA and other relevant documents.

6.5 This is shown overleaf in **Table 3. Proposed Accommodation Summary (Maximum Parameters)**.



Accommodation Summary (Maximum Unit Mix and Tenure)				
	Private	Intermediate	Social Rent	All tenures
Studio / 1 bed	401	43	4	448
2 bed	234	25	82	334
3 bed	34	0	41	75
4 bed	0	0	34	34
TOTAL	669	68	159	891

- 6.1 The final detailed proposals for the Outline Component including the final number of homes will be decided at future Reserved Matters Application stage.
- 6.6 All residential accommodation would be high quality and benefiting from private external amenity space or an area that significant exceeds minimum internal space standards s The housing is centred around a private central garden, aforementioned above, which will provide play space for children ages 0 to 11.
- 6.7 The Proposed Development comprises 71% of dual aspect units based on the Illustrative Masterplan and provides a good level of daylight sunlight within all dwellings.

Affordable Housing Provision

- 6.8 The Proposed Development provides Fast Track compliant levels of affordable housing comprising 35% by habitable room when the Detailed and Outline Components of the Proposed Development are combined. The Proposed Development will therefore follow the London Plan Fast Track approach to viability as explained below.
- 6.9 Policy H5 Threshold Approach To Applications of the adopted London Plan states that the threshold level of affordable housing is *"1) a minimum of 35; or, 2. 50% for public section land and for Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites appropriate for residential uses where the scheme would result in a net loss of industrial capacity"*.
- 6.10 However, as outlined in Footnote 59 of the London Plan, some surplus utilities sites are subject to substantial decontamination, enabling and remediation costs. The London Plan sets out that therefore if it is robustly demonstrated that extraordinary decontamination, enabling or remediation costs must be incurred to bring a surplus utilities site forward for development, then a 35% affordable housing threshold could be applied.



- 6.11 St William will demonstrate to the GLA that extraordinary costs are present at the Site, and therefore the 35% threshold for affordable housing applies. Hence, the application is to follow the London Plan Fast Track.

Townscape, Visual Impact and Heritage

- 6.12 As set out above, the Proposed Development has been through extensive pre-application discussion through a series of meetings with RBKC, as well as other statutory consultees such as Historic England. The proposals have also been subject to the review by the Council's Quality Review Panel on three occasions. The proposals have taken on board comments made to date, and the scheme has evolved as a result, and sought to minimise heritage harm in the context of delivering all policy objectives for this strategic site in an Opportunity Area.
- 6.13 Overall, the scale and massing of the Proposed Development has been designed in accordance with adopted planning policy for the Site in relation to both the tallest building and the height distribution across the Site, and to sit comfortably within the sensitive surrounding townscape whilst fully optimising the aspirations of the Site Allocation through a design and landscape led approach. The Proposed Development has also been designed in full collaboration with the neighbouring Ballymore Sainsburys development. Please refer to the Design and Access Statement and the Townscape and Visual Impact Assessment for further details.

Landscaping, Urban Greening and Biodiversity

- 6.14 Landscaping has been at the heart of the Proposed Development, and the proposals on Site seek to deliver high quality landscaping for future residents, employees and visitors at the Site that is accessible to all.
- 6.15 The proposed landscaping comprises a large central garden, extending to 0.3ha across the middle of the Site, which will include a range of lush and richly planted species that provides residents an opportunity for contact with nature. The proposed landscaping will include diverse play space and amenity provisions throughout, whilst securing privacy for residents of the ground floor units, and private amenity spaces.
- 6.16 To the east of Block F, and south of Block E, at the Site's arrival, high quality landscaping is proposed to help to provide a sense of arrival, and announce the unique character of the Kensal Green Gasworks Site. The Site's entrance will allow for



servicing whilst avoidance conflict with pedestrians and cyclists, and mitigate level change between the boundary of the Site and the proposed central garden.

- 6.17 The streetscapes of the Proposed Scheme will incorporate street trees and greening, whilst allowing vehicle, pedestrian and cycle connections into the wider masterplan.
- 6.18 In regard to the canalside specifically, located to the north of Blocks C, D and E, the Proposed Development seeks to optimise play space and amenity areas in sunny spots where buildings have been set back from the canal to optimise this space. This area also includes green corridors along the canal through naturalistic and diverse planting, and allows for further future enhancements of the towpath beyond the Applications' boundary.
- 6.19 The Proposed Development has incorporated significant greening measures and achieves an Urban Greening Factor (UGF) score of 0.4.
- 6.20 The proposals will also deliver a significant number of habitats in the end use. The biodiversity net gain figure of the Proposed Development will be secured via off site means.

Access, Transport, Deliveries and Servicing

- 6.21 As set out above, whilst the aspiration is to deliver the St William Masterplan Scenario, in which both the St William and Ballymore / Sainsbury's schemes come forward allowing a comprehensive redevelopment of the KCOA, St William always require the ability to deliver the St William Standalone scenario in the event the Ballymore and Sainsbury's live application does not come forward, or in the case that St William's proposals come forward before Ballymore.
- 6.22 For the avoidance of doubt, the only difference between scenarios is how the St William Development Planning Application will be accessed, and whether works to the landscape to facilitate the proposed bus turning facility will be delivered or not.
- 6.23 As such, the St William Development Planning Application will comprises two scenarios in relation to access, transport, deliverables and servicing.



Masterplan Scenario

- 6.24 Within the proposed Masterplan Scenario, the Site will be accessed via Ballymore / Sainsbury's primary roads as per the details of the live Ballymore Sainsbury's application

Standalone Scenario

- 6.25 Under the Standalone Scenario, the Site is to be accessed via Canal Way. A series of comprehensive upgrade works are proposed to facilitate improved vehicle pedestrian and cycle access to the Site including lighting, landscaping, boundary treatments and a new Ladbroke Grove Canal Way Junction. All covered under the St William Canal Way Works Planning Application. The proposals also include some amendments to the proposed landscaping on the St William Development Planning Application Site, to allow a Transport for London bus to extend to the Site, by providing a bus stop and stand, and the provision for the bus to turnaround. The amended landscaping would be provided within the detailed component of the application to the west of the Site.
- 6.26 Further details of the two access scenarios can be found within the supporting Design and Access Statement, and Transport Assessment.

Car Parking, Car Club and Cycle Parking

- 6.27 The Proposed Development will be car free, apart from the delivery of 79 blue badge, accessible spaces in the proposed basement. The Proposed Development will also include 2 servicing parking spaces, also in the basement.
- 6.28 The Proposed Development will not include car club spaces.
- 6.29 In regard to cycle parking, the St William Development Planning Application will seek to deliver the provision as outlined in **Table 4. Proposed Cycle Parking** below.

Table 4. Proposed Cycle Parking

Building	Proposed Cycle Provision		
	Two-Tier Stands	Sheffield Stands	TOTAL
Block A	90	4	224
Block B	176	44	220
Block C	133	33	166
Block D	130	33	163



Block E	<i>To be confirmed</i>	<i>To be confirmed</i>	156
Block E	<i>To be confirmed</i>	<i>To be confirmed</i>	438
TOTAL			1,367

6.30 In addition to the provision above, Blocks B, C, A and D will all each have 2 accessible cycle parking spaces.

6.31 Visitor cycle spaces are also provided within the landscape.

Energy and Sustainability

6.32 In regard to Energy and Sustainability, all buildings within the Proposed Development have been designed to minimise heat losses through the incorporation of high levels of insulation, triple-glazed windows and very good air tightness.

6.33 The Proposed Development seeks to enable all dwellings to be connected to a site-wide low-temperature heat network, that will generate and store heat by using Air Source Heat Pumps which will be located at roof level and Thermal Stores in the proposed basement. Room and water heating in the Proposed Development's apartments will be provided by water source heat pumps located in each apartment's utility cupboard.

6.34 In addition to the above, the Proposed Development seeks to utilise flat roofs for PV panels, where possible.



7. Planning Policy Framework and Overview

- 7.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 7.2 The purpose of this Chapter is to identify the Development Plan as it relates to both the hybrid planning application and detailed planning application's relevant policies to be considered. An assessment of the Proposed Development in the context of the relevant policies is included in Chapter 8.
- 7.3 The Development Plan for the RBKC Site comprises the following:
- London Plan (adopted March 2021)
 - RBKC Local Plan Review (adopted July 2024)
- 7.4 In addition to the Development Plan, regard has been had to the National Planning Policy Framework ("NPPF") (2024).
- 7.5 The NPPF (most recently updated in December 2024) sets out the Government's planning policies for England. These policies articulate the Government's vision for sustainable development, which should be interpreted and applied locally to meet local aspirations.
- 7.6 The NPPF states that the purpose of the planning system is to advise and guide on best practice development which is as sustainable as possible. The NPPF stresses that the goal of sustainable development should not hinder or prevent future development. The overarching national planning policy theme is that of sustainable development. The Government has advised that this should be a central theme for plan making and decision taking.

Regional Policy – The London Plan (2021)

- 7.7 The London Plan (2021) provides the spatial development strategy for Greater London. It sets out a strategic policy framework for development in London.

Local Policy – RBKC Local Plan Review (2024)

- 7.8 RBKC's Local Plan Review (2024) was adopted in July 2024. It sets out the spatial policies, development management policies and site allocations to guide and manage development in RBKC.



Supplementary Guidance

- 7.9 Planning guidance produced by the Government, the Mayor of London and RBKC is also of relevance to the applications. The following guidance does not form part of the Development Plan against which the Proposed Development is assessed, but has been taken into consideration where relevant.

National Guidance

- 7.10 The Government has published national Planning Practice Guidance (“PPG”), which is updated periodically.

Regional Guidance

- 7.11 The Mayor of London has published various Supplementary Planning Guidance (SPG) documents. Of relevance to this Site and the Proposed Development are the following adopted documents:

- Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)
- Accessible London: Achieving an Inclusive Environment SPG (2014)
- Shaping Neighbourhoods: Character and Context SPG (2014)
- Sustainable Design and Construction SPG (2014)
- Housing SPG (2016)
- Affordable Housing Viability SPG (2017)
- Energy Planning Guidance (2022)
- Sustainable Transport, Walking and Cycling LPG (2022)
- ‘Be seen’ Energy Monitoring Guidance LPG (2022)
- Whole Life-Cycle Carbon Assessments LPG (2022)
- Circular Economy Statement LPG (2022)
- Characterisation and Growth Strategies LPG (2023)
- Housing Design Standards Local Plan Guidance (‘LPG’) (2023)
- Urban Greening Factor LPG (2023)
- Optimising Site Capacity: A Design-led Approach LPG (2023)
- Air Quality Neutral LPG (2023)
- Accelerating Housing Delivery Planning and Housing Practice Note (2024)

- 7.12 In addition to the approved documents as listed above, the following documents of relevance are currently published by the GLA in draft:



- Fire Safety LPG (draft February 2022)
- Affordable Housing LPG (draft May 2023)
- Development Viability LPG (draft May 2023)

7.13 TGLA's Accelerated Housing Delivery Planning and Practice Note (December 2024) is a key material consideration. This document sets out the Mayor's priority of increasing housing delivery across London, specifically mentioned the importance of bringing forward affordable housing to diversity and increase housing for all.

Local Guidance

7.14 RBKC has published the following SPG documents. Of relevance to this Site and Proposed Development are the following adopted documents:

- Kensal Canalside Opportunity Area SPD
- Designing Out Crime SPD (2008)
- Noise SPD (2009)
- Air Quality SPD (2009)
- Access Design Guide SPD (2010)
- Trees and Development SPD (2010)
- Building Height SPD (2010)
- Transport and Streets SPD (2016)
- Planning Contributions SPD (2019)
- Community Housing SPD (2020)
- Greening SPD (2021)

Site Designations

7.15 The Site has the following designations:

- Kensal Canalside Opportunity Area (London Plan and Local Plan Review)
- Flood Risk 1/2/3

7.16 Adopted RBKC Local Plan Review Policy SA1 (Kensal Canalside Opportunity Area) allocates the wider Kensal Canalside Site for the following:

- Around 3,500 or more new homes (C3);
- Around 12,000 sqm or more of non-residential floorspace (in addition to the relocated supermarket), including workspace, community, and local shopping



facilities commensurate with the Site's Neighbourhood Centre designation of which 5,000 sqm is E(g) office, research and development or light industrial, as part of a new Neighbourhood Centre;

- The provision of affordable workspace at 10 per cent of the commercial floor space E(g). This affordable workspace must be provided at a capped rate of 50 per cent less than the prevailing market rate for a period of 20 years;
- The relocation and re-provision of the existing supermarket;
- On-site renewable energy sources; and,
- The provision of public open space of a scale commensurate to the needs of the development.

7.17 The relevant pages of the adopted RBKC Local Plan Review which outline the details of Policy SA1 (Kensal Canalside Opportunity Area) can be found in **Appendix 1**.



8. Planning Policy Assessment

- 8.1 This Chapter assesses the Proposed Development in the context of national, regional and local planning policy and guidance relevant to the determination of both applications proposed.
- 8.2 The Proposed Development is assessed as a whole and by topic within this Chapter. The assessment for each topic has regard to key national, London Plan and RBKC planning policy and guidance. Where relevant under each topic heading, additional assessment of the detailed component of the hybrid application, and the Canal Way Works full application is provided to reflect the greater level of detail submitted.
- 8.3 The following topics will be covered:
- Principle of Development
 - Principle of Residential Accommodation
 - Housing Mix and Tenure
 - Design including Height and Massing
 - Townscape, Visual Impact and Heritage Considerations
 - Landscaping, Urban Greening and Biodiversity
 - Access, Transport, Deliveries and Servicing
 - Energy and Sustainability
 - Daylight and Sunlight
 - Flood Risk and Drainage
 - Fire Safety

Principle of Development

- 8.4 At the heart of the NPPF is the presumption in favour of sustainable development, achieved through meeting the three ‘overarching aims’: building a strong, responsive and competitive economy; supporting strong, vibrant and healthy communities; and contributing to, protecting and enhancing the natural, built and historic environment.
- 8.5 The NPPF requires strategic planning policies to make “...as much use as possible of previously developed or ‘brownfield’ land” (Paragraph 124). Paragraph 131 also states that “good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”.
- 8.6 The above is supported by the London Plan which at a regional level, outlines the GLA’s ambition to also make the best use of land and enable the development of brownfield



through Policy GG2. The policy states that Councils should proactively explore the potential to intensify the use of brownfield land to support additional homes, particularly those located in locations with good public transport links. Policy D3 sets out that all development must make best use of land through following the design led approach to optimise site capacity.

- 8.7 At the local level, redevelopment of the Site is set out in RBKC's Site Allocation under Policy SA1 which seeks the delivery of the wider Kensal Canalside Site to provide high quality housing, including affordable housing, non-residential floorspace, and public open space.
- 8.8 Policy PLV1 Kensal Canalside Opportunity Area of the RBKC Local Plan Review sets out that the redevelopment of the Kensal Canalside Opportunity Area will transform the former gasworks and railway depot into a thriving, well-connected mixed and inclusive community.
- 8.9 The Proposed Development is a product of a carefully considered design-led process that has evolved through extensive pre-application engagement over four years to ensure a balance is struck between optimisation of development on the Site and the delivery of high quality accommodation and public open spaces.
- 8.10 The St William Development Planning Application will allow for the delivery of Plot 3 of the wider masterplan, and bring forward 794 new residential units, at over 35% affordable by habitable room. The Proposed Development will see the optimisation of a brownfield site which will contribute significantly to RBKC's, and more widely London's, housing delivery targets and ensuring high quality sustainable development
- 8.11 The principle of the Proposed Development is acceptable and in accordance with the strategic planning policy objectives for the redevelopment of the Site. This applies to the outline and detailed components of the hybrid planning application, as well as the detailed application for the improvements and Canal Way.

Principle of Residential Accommodation

- 8.12 The delivery of new homes is a core planning principle contained within the NPPF, Paragraph 61 identifies The Government's objective to "*significantly boost the supply of housing...*". Paragraph 11 of the NPPF states that Local Plans should meet the objectively assessed need for housing within its area. It further states that housing applications should be considered in the context of the presumption in favour of sustainable development.



- 8.13 As above, Paragraph 61 of the NPPF outlines that in order to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed. The NPPF also promotes the efficient use of land with high density development in accessible locations.
- 8.14 At the regional level, Policy H1 of the London Plan seeks the provision of 52,287 additional homes per year across London. It also identifies a housing provision target of 4,480 additional homes to be completed across a 10 year period in RBKC. In support of these identified housing targets, policies GG2 and GG4 of the London Plan encourages the pro-active exploration of the potential to intensify the use of land to support additional homes, prioritising the redevelopment of brownfield land to create mixed and inclusive communities.
- 8.15 This is furthered by the adopted RBKC Local Plan which outlines in Policy HO1: Delivery and protection of homes that the Council seek to meet and exceed the London Plan target, which is currently 4,480 new homes over 10 years in the borough by delivering 1,250 homes in the first five years of the Local Plan (2024/25 to 2028/29) with an annual target of 250 homes.
- 8.16 The policy later sets out that RBKC will aim to deliver 3,230 homes in years six to ten of the Local Plan (2029/30 to 2033/34); and, deliver 4,480 homes in years eleven to twenty of the Local Plan (2034/35 to 2043/44).
- 8.17 Under the latest Housing Delivery Test (published in December 2024), RBKC have only delivered 855 homes in the last three years against a target of 1,361 equating to 63%. This results in the presumption in favour of sustainable development – as outlined in the NPPF Paragraph 11 being applicable.
- 8.18 Policy HO1 specifically references the Council's support in the delivery of homes on site allocations, and suggests they will optimise the homes delivered on all sites using a design led approach and benchmarking against the nationally described housing standards.
- 8.19 The principle of housing, and affordable housing, on the application Site is supported at national, regional and local levels, particularly through the Site's allocation for housing in the adopted RBKC Local Plan.



Housing Mix and Tenure

- 8.20 First in regard to housing mix, within Policy H10 of the London Plan, the GLA set out that schemes should generally consist of a range of unit sizes. The policy outlines that to determinate the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicant and decision makers should have regard to robust local evidence.
- 8.21 At the local level, RBKC Local Plan Review Policy HO4 states new residential developments must include a mix of types and sizes of homes to reflect the varying local needs of the borough, taking into account the characteristics of the site and current evidence in relation to housing need.
- 8.22 RBKC'S latest Local Housing Needs Assessment (LHNA) (dated September 2022) sets out the proposed target for market housing across the Borough for each unit type, and is outlined below as follows:
- 1 bed: 35% (of new dwellings)
 - 2 bed: 40%
 - 3 bed: 20%
 - 4 bed, 5 bed or more: 5%
- 8.23 For affordable homes, RBKC'S Local Housing Needs Assessment outlines that the current need for homes in each unit type is as shown below:
- Studio / 1 bed: 16%
 - 2 bed: 44%
 - 3 bed: 28%
 - 4 bed: 12%
- 8.24 Policy HO4 of the RBKC Local Plan Review confirms that 90% of new homes must meet Building Regulation requirement to be M4(2), accessible and adaptable dwellings. The remaining 10% must be M4(3) compliant.
- 8.25 Next in relation to housing tenure, at the regional level, Policy H4 Delivering Affordable Housing sets out the GLA's strategic target for 50% of all new homes delivered across London to be genuinely affordable.
- 8.26 In addition, Policy H5 Threshold Approach to Applications of the London Plan, outlines that threshold approach which applies to major development proposals which trigger



affordable housing requirements. The policy sets out that the threshold level of affordable housing on gross residential development is initially set at: *“1) a minimum of 35; or, 2. 50% for public sector land and for Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites appropriate for residential uses where the scheme would result in a net loss of industrial capacity”*.

- 8.27 However, Footnote 59 of the London Plan outlines that some surplus utilities sites are subject to substantial decontamination, enabling and remediation costs. The Footnote continues that therefore if it is robustly demonstrated that extraordinary decontamination, enabling or remediation costs must be incurred to bring a surplus utilities site forward for development, then a 35% affordable housing threshold could be applied.
- 8.28 St William have demonstrated to the GLA that extraordinary costs at the Site, and therefore the 35% threshold for affordable housing applies.
- 8.29 London Plan Policy H5 further outlines that to follow the Fast Track route for affordable housing, applications must be consistent with the relevant tenure split, as set out in Policy H6 Affordable Housing Tenure.
- 8.30 Policy H6 states that the following provision should be provided:
- 30% low-cost rented homes, as either London Affordable Rent or Social Rent (as a minimum);
 - 30% intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership (as a minimum); and,
 - the remaining 40% to be determined by the borough as low-cost rented homes or intermediate products.
- 8.31 At the local level, RBKC Local Plan Review Policy HO3: Community Housing sets out that the Council will seek to maximise the provision of affordable housing in the Borough, and require community housing from development creating new residential floorspace of 650 sqm gross residential floorspace or more. Part C of Policy HO3 states affordable housing will be required to be delivered through the threshold approach as set out in the London Plan including using the Fast Track Route.

In regard to the tenure mix, RBKC Local Plan Review Policy HO3 sets out that affordable housing must be provided as 70% social rent. The Policy confirms that the



remaining 30% of affordable housing must be provided as intermediate with the preferred product being London Living Rent.

- 8.32 The St William Development Planning Application's Illustrative Masterplan would deliver c.794 new residential units with 35% affordable housing by habitable room when including the Detailed and Outline Components of the scheme.
- 8.33 The Illustrative Masterplan housing mix and tenure is set out in full in **Table 5. Proposed Accommodation Summary (Illustrative Scheme)** below.

Table 5. Proposed Accommodation Summary (Illustrative Scheme)

Market Accommodation (65% by habitable room)		
Unit Type	Description	Number of Units
Studio	1 bed 1 person	139
1 Bed	1 bed 2 person	188
2 Bed	2 bed 3 person	0
	2 bed 4 person	213
3 bed	3 bed 5 person	44
4 bed	4 bed 6 person	0
TOTAL		584

Affordable Accommodation (35% habitable room)		
London living rent		
Unit Type	Description	Number of Units
Studio	1 bed 1 person	0
1 Bed	1 bed 2 person	40
2 Bed	2 bed 3 person	24
	2 bed 4 person	0
3 bed	3 bed 5 person	0
4 bed	4 bed 6 person	0
TOTAL		64
Social rent		
Unit Type	Description	Number of Units
Studio	1 bed 1 person	0



1 Bed	1 bed 2 person	3
2 Bed	2 bed 3 person	45
	2 bed 4 person	24
3 bed	3 bed 5 person	26
4 bed	4 bed 6 person	48
TOTAL		146
AFFORDABLE TOTAL		210

- 8.34 As outlined above, the Proposed Development meets the requirements of London Plan Policy H5 and Footnote 59.
- 8.35 In regard to mix within the proposed market units specifically, the Illustrative scheme represent a higher provision of studio and 1 bed dwellings than targeted within RBKC's Local Housing Needs Assessment, and a slightly lower provision of 2 bed dwellings. There is also a slightly lower provision of 3 bed dwellings. The market mix is important to help deliver the affordable housing mix, as explained below.
- 8.36 In regard to the proposed affordable housing's dwelling mix, the Illustrative scheme aligns positively with RBKC's latest affordable housing need and provides for a significant number of affordable family homes. The Illustrative scheme provides a slight overprovision of 1 beds, but aligns with the RBKC need of 44% of the total affordable provision to be 2 beds. The Illustrative scheme provides slightly less than the need for 3 bed affordable homes, but significantly exceeds the need outlined in RBKC's latest LHNA in regard to 4 bed dwellings, reinforcing the provision of a significant number of affordable family homes.
- 8.37 Overall, the Illustrative scheme's proposed housing mix is in line with the requirements of London Plan and RBKC's Local Plan Review policies. The scheme seeks to align with the proposed targets and needs set out in RBKC's latest LHNA.
- 8.38 In regard to tenure split when measured by units the proposals comprise a tenure split of 70% social rent and 30% intermediate, which aligns with the requirements set out in RBKC Policy HO3. The Proposed Development's tenure split was discussed at length with the Council in pre-application discussions.
- 8.39 With all of the above in mind, the proposed housing mix and tenure Illustrative scheme is deemed acceptable with regard to the relevant policy context and has been discussed at length with RBKC through pre app.



Design including Height and Massing

- 8.40 The design approach of the Proposed Development is outlined in full in the submitted plans, drawings and DAS, prepared by Pilbrow and Partners. Detailed computer generated images ('CGIs') have also been prepared and illustrate the proposed detailing and materiality of the Proposed Development. Façade studies for approval are included under a separate cover.
- 8.41 As aforementioned, the Proposed Development comprises a Detailed and an Outline Component. In addition to this Statement, a Development Specification, Design Code and Parameter plans have been submitted under separate cover. These documents act as control documents that any future reserved matters applications, under the Outline Component of the Proposed Development, will need to show accordance with.
- 8.42 Chapter 12 of the NPPF focuses on achieving well-designed places. The paragraphs in this chapter focus on ensuring that all new development design quality is of a high standard and provide beautiful and sustainable buildings which in turn create better places in which to live and work.
- 8.43 Paragraph 131 of the NPPF states that the creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve, and that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 8.44 Paragraph 135 of the NPPF outlines that planning policies and decisions should aim to ensure that developments:
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
 - d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;



- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
 - f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.
- 8.45 Moreover, the National Design Guide (as produced by Ministry of Housing, communities and Local Government) published in 2021 sets out national goals and planning guidance for developing beautiful, enduring and successful places.
- 8.46 At the regional level, London Plan Policy GG1 requires all new buildings and spaces they create to help reinforce or enhance neighbourhood identity, legibility, permeability, and accessibility.
- 8.47 In addition, London Plan Policies D4 and D3 set out the GLA's policies on design. Policy D3 sets out that all development needs to make the best use of the land by following a design led approach and be of high quality design. With higher density development be within highly accessible locations which are well connected. Whilst Policy D4 looks for development to deliver good design throughout the process to completion.
- 8.48 In regards to tall buildings, London Plan Policy D9: Tall Buildings sets out that Development Plans and Boroughs should define what is considered a tall building and which areas a tall building may be an appropriate form of development. The policy states that in any such location, appropriate tall building heights should then be identified on maps in Development Plans. Policy D9 also requires Boroughs, within their Development Plans, to define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.
- 8.49 Local Plan Policy CD8: Tall Buildings states there are two definitions of tall buildings across the Borough, based on where they are located – 1. 21m or more in height from the ground to the top of the building, and 2. 30m or more from ground to the top of the building. The Policy further sets out that proposals that meet or exceed this criteria will be assessed in accordance with London Plan Policy D9, aforementioned above.
- 8.50 Adopted RBKC Policy CD1: Context and Character sets out that development is required to be beautiful, respecting the existing context, character and appearance, including historic characteristics. Policy CD1 describes that development should



enhance the quality and character of buildings, and improve connectivity and function, including making it inclusive for all. The policy goes on to outline that opportunities should be taken to contribute positively and respond to the local townscape through its architecture and urban form through a range of measures.

- 8.51 Furthermore, Policy CD2: Design Quality, Character and Growth of the RBKC Local Plan outlines that the Council require all development to meet the highest standards of urban design and architectural quality, taking opportunities to improve the local area, its character, and the way it functions.
- 8.52 More specifically to the Site, Local Plan Review Site Allocation SA1: Kensal Canalside Opportunity Area supporting paragraph 3.8 states that the Site is considered to be suitable for tall buildings due to the development's capacity potential identified through the Site's designation in the London Plan as an Opportunity Area, and having regard to local capacity studies undertaken.
- 8.53 Furthermore supporting paragraph 3.8 further outlines that 31 storeys is given as an approximate limit, due to the fact the final height of proposals may vary based on actual floor to ceiling heights. However paragraph 3.8 states the maximum height should be 98m from ground when measured up to the upper floor roof parapet and excluding lift over run and plant.
- 8.54 Within the Kensal Canalside Opportunity Area SPD, RBKC outline that the impact of any tall building development proposal (above 18m) will be assessed in line with Policy D9 (Part C) and (D) of the London Plan which will involve (amongst other criteria) an assessment of visual impacts from different distances; whether a group or stand-alone tall buildings are reinforcing the spatial hierarchy of the local and wider context to aid legibility and wayfinding and that architectural quality and materials are of an exemplary standard.
- 8.55 The SPD further outlines that proposals for any tall buildings (above 18m) that will result in harm to designated heritage assets, particularly the setting of the listed Kensal Green cemetery will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The SPD confirms that buildings should positively contribute to the character of the area.
- 8.56 The aforementioned SPD provides a diagram which indicates the indicative heights across the KCOA. The diagram shows heights of between 4-20 storeys with four areas identified to where taller buildings may be acceptable outside the 4-20 storeys



suggested. The diagram of the Kensal Canalside Opportunity Area's indicative height strategy can be found in **Appendix 2**.

- 8.57 In line with the national, regional and local policies outlined above the Proposed Development has been developed in collaboration with the adjacent land owner, Ballymore and Sainsbury's, and their master planner Faulkner Brown Architects, to deliver a high quality, coherent masterplan for the Site.
- 8.58 The proposed height, scale and massing of the scheme has been designed to sit comfortably within the sensitive surrounding townscape whilst also optimising the Site through a design and landscape led approach. The submitted proposals are a result of an extensive pre-application process with RBKC, the Council's Quality Review Panel, and the GLA. The distribution of height is in accordance with policy and the tallest building F is also policy compliant. The canalside blocks exceed RBKC heights policy for the Site, however, have been extensively studied to ensure the optimal balance of design, residential quality, meeting the aspirations of the site allocation and responding to the Site's existing and emerging context.
- 8.59 As outlined above, London Plan Policy D9 requires development proposals to address the visual impacts, functional impacts, environmental impacts and cumulative impacts of tall buildings within a development. These have been addressed with the Proposed Development and are outlined in further detail below.

Visual Impact

- 8.60 In support of the proposals, a Townscape & Visual Impact Assessment (TVIA) has been prepared by Tavernor Consultancy, and is submitted under separate cover. The TVIA assesses the potential visual impact of the Proposed Development on the surrounding area's townscape. The TVIA sets out the 54 verified viewpoints from which the proposals have been assessed.
- 8.61 The assessment set out within the TVIA looks to categorise the impact resulting from the Proposed Development into the following categories:
- None - No change to townscape character;
 - Very Low – A change to townscape character and/or features that would be barely perceptible;
 - Low - A slight change to townscape character and/or features that may not be immediately noticeable;
 - Medium – A clear change that would not dominate townscape character and/or features which would be noticeable; and,



- High - A change to townscape character which would be immediately apparent.

8.62 Tavernor Consultancy's assessment concluded that completed Proposed Development would result in townscape and visual effects which are beneficial or neutral in nature. This is with the exception of three views in which the effect is considered to be adverse, to a small extent and acceptably so in the context of the large-scale redevelopment set out in planning policy and guidance for the KCOA within which the Site is located.

8.63 On this basis, the Proposed Development is seemed acceptable in regard to visual impact, in line with the requirements of London Plan Policy D9. Further details of the proposal's Townscape and Visual Impact Assessment can be found within the TVIA submitted under separate cover.

Functional Impact

8.64 Policy D9 of the London Plan sets out that the following functional impacts should be addressed:

- Internal and external design and building materials;
- Servicing and building maintenance;
- Capacity at entrances and accesses for peak time use;
- Capacity of the area's transport network;
- Jobs and other economic activities; and,
- Interference with aviation, navigation or telecommunication.

8.65 The Detailed Component of the St William Development Planning Application is submitted alongside details of internal and external design and building materials. Further information of these details can be found within the supporting Design and Access Statement, prepared by Pilbrow and Partners.

8.66 For the Outline Component of the scheme, internal and external design and building materials will form part of future reserved matters applications – future applications would need to accord with the submitted Parameter Plans, Design Code and Development Specification.

8.67 In regard to servicing and building maintenance, the proposals are supported by a Delivery and Servicing Plan, prepared by SLR. These plans, along with the Transport Statement, set out the servicing strategy for both the Masterplan and Standalone scenarios for the Proposed Development.



- 8.68 First, under the Masterplan scenario, the westernmost servicing area is located along the western boundary of the Site and is the only servicing area proposed in detail. This servicing area is accessible via the proposed two-way service road, which is to be used for access and egress. The Outline Component's proposed servicing and building maintenance comprises a layby along the southern boundary of the Site. Full details of the Proposed Development's servicing and maintenance would need to be provided in future Reserved Matters applications.
- 8.69 The Transport Statement confirms that under the Standalone scenario (in the event the Ballymore scheme does not come forward, or the St William scheme is brought forward first), a separate service road is proposed, which wraps around the western edge of the Site, forming a loop around proposed Block B with a priority junction proposed between Blocks A and B. The service road allows servicing and building maintenance to continue without access via Ballymore's adjacent Site.
- 8.70 In addition to the above, the aforementioned Transport Statement also provides an assessment of the Proposed Development and the impact it may have on peak time use, and the wider transport network. The Transport Statement outlines a range of strategies that aim to reduce the impact of development, this includes, were feasible, vehicle movements across the site will be coordinated to take place outside of peak times, considering both highway and pedestrian peaks.
- 8.71 In relation to the impact of jobs, services, facilities and economic activity that will be provided by proposals, the Proposed Development has been designed to ensure an integrated masterplan across the wider KCOA, which collectively will provide significant economic benefits. In the St William Development Planning Application specifically, the scheme includes the delivery of a high quality, flexible commercial space on site which is intended to be a local café which will offer job opportunities to local people, and support the local economy.
- 8.72 Finally, in regard to London Plan Policy D9 Part C (2e), it is anticipated that the Proposed Development's tall buildings will have no negative impact on aviation, navigation or telecommunication.
- 8.73 The Proposed Development meets the requirements of London Plan Policy D9 in relation to functional impact, and therefore our assessment moves onto environmental impact from the proposals.



Environmental Impact

- 8.74 In regard to environmental impact, in support of the Proposed Development, an Environmental Statement (ES), prepared by Temple, has been submitted under separate cover. This assesses the environmental impacts of the proposed tall buildings, including daylight and sunlight, and wind, to ensure the scheme is high quality for future residents, tenants and visitors.
- 8.75 The ES Chapter on Wind and Microclimate sets out that wind tunnel tests have been undertaken, and they provide a detailed assessment of the mean and gust wind conditions around the Proposed Development in terms of pedestrian comfort and safety.
- 8.76 The assessment concludes there would be no occurrences of strong winds with the potential to be a safety concern to more vulnerable pedestrians and to cyclists as a result of the Proposed Development within the detailed component. The proposed tall buildings are therefore deemed acceptable in regard to wind and microclimate.
- 8.77 The impact of the Proposed Development's Outline Component will be assessed in regard to wind and microclimate at the Reserved Matters stage.
- 8.78 In addition to the above, the supporting Daylight and Sunlight Assessment, submitted under separate cover, outlines the impacts of the Proposed Development. The assessment concludes that the proposals have thoroughly considered and designed to respond optimise the daylight and sunlight performance within the scheme and to meet the aspirations of BRE guidance. This confirms the Proposed Development is acceptable in relation to daylight and sunlight.
- 8.79 The proposals are considered to be of high quality, and aforementioned technical assessments have shown the Proposed Development, and the inclusion of tall buildings specifically, has little to no environmental impact.

Cumulative Impact

- 8.80 Chapter 16 of the ES sets out the likely cumulative visual, function and environmental impacts of proposed and consented developments in the Site's surrounding area. The ES outlines that there would be minor impacts on daylight and sunlight, and minor-neutral impact on some local heritage assets. The ES sets out there are also moderate impacts on other heritage asset. The report concludes other than those outlined



above, the cumulative effects of the Proposed Development and committed developments would be as for the Proposed Development in isolation.

Conclusion

- 8.81 Following the assessment outlined above, it is clear the Proposed Development aligns with the requirements of Policy D9 of the London Plan, and the guidance within the Kensal Canalside Opportunity Area SPD.
- 8.82 The Proposed Development's design, including height and massing, is of high quality and directly responds to the requirements of national, regional and local policy. Therefore the proposals are acceptable in regard to design.

Townscape, Visual Impact and Heritage Considerations

- 8.83 This section should be read in conjunction with the Townscape Visual Impact Assessment and Heritage Statement, prepared by Tavernor Consultancy / Smith Jenkins, which accompany this planning application.
- 8.84 National planning policy relating to conservation and enhancement of the historic environment is set out in Chapter 16 of the NPPF as amended. It gives guidance relating to designated heritage assets including Listed Buildings, Conservation Areas, World Heritage Sites, Registered Parks and Gardens, and undesignated heritage assets.
- 8.85 In order to assess the nature and degree of potential impacts on the significance of heritage assets, the NPPF requires *"an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets"* importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 8.86 Paragraph 212 of the NPPF requires that great weight is given to conservation of heritage assets irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Paragraph 213 further states: *"Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification"*. NPPF paragraph 214 requires that: *"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."*



- 8.87 In addition, Policy HC1 of the London Plan states that development affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings.
- 8.88 London Plan Policies HC3 and HC4 set out policy guidance on the views both at a local and strategic level (London View Management Framework). The policies set out that development proposals should not harm, and should seek to make a positive contribution to views and their landmark elements.
- 8.89 At the local level, Policy CD3: Heritage Assets of the RBKC Local Plan Review states that applications for development which affect a designated heritage asset should be based on an informed understanding of the significance of the heritage asset, including any contribution made by its setting, which is sufficient to understand the potential impact of the development on that significance.
- 8.90 Policy CD4: Heritage Assets – Conservation Areas of the RBKC adopted Local Plan Review requires all development to preserve or enhance the character or appearance and significance of the conservation area and thereby protect the special architectural or historic interest of the area. Whilst the Site is not located within a conservation area, it is in close proximity to the Kensal Green Cemetery across the canal.
- 8.91 In line with the above, the Proposed Development is supported by a Heritage Statement and a Townscape , Visual Impact Assessment, both submitted under separate cover.
- 8.92 The Heritage Statement concludes that proposals would result in harm to the setting and significance of several heritage assets associated with Kensal Green Cemetery, however this has been deemed less than substantial. As outlined above, in Paragraph 212 of the NPPF, where a development would lead to '*less than substantial*' harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.
- 8.93 A public benefit is defined in the Planning Practice Guidance (PPG) as anything that delivers economic, social or environmental objectives as described in Paragraph 8 of the NPPF.
- 8.94 The proposed public benefits of the Proposed Development are as follows:



Social Benefits

- Delivery of much needed new high quality homes including a significant number of new affordable homes. The Illustrative Masterplan delivers 35% affordable housing by habitable room with a policy compliant tenure split, which will significantly aid RBKC in addressing their acute housing need, in addition to contributing to London's housing need more widely;
- Significant new high quality open spaces accessible to all and improvements to local pedestrian and cycle movement, all available to local residents;
- Localised expenditure in shops, food and beverage establishments;
- Local training, skills and employment opportunities during construction.

Economic Benefits

- Delivery of high quality, flexible commercial space on Site, intended to operate as a local café, which will support the local economy;
- A significant package of Community Infrastructure Levy and Section 106 financial contributions to mitigate the impacts of the development and deliver local community benefit;

Environmental Benefits

- Development of a brownfield site in an Opportunity Area allocated for development through a design and landscape led approach to optimise the delivery of new homes and create exemplar new buildings and public realm;
- Significant landscaping which will provide ecology and biodiversity benefits to the immediate site and wider area;
- Site wide urban greening factor of 0.4, in line with London Plan requirements;
- High quality dwellings including genuinely affordable homes with private amenity space and communal landscaping;
- A car-free scheme, except accessible car parking, to encourage a shift towards a more sustainable travel measures.

8.95 It is clear that the less than substantial harm resultant of the Proposed Development is significantly outweighed by the various public benefits the proposals will bring forward. Therefore, proposals are in line with Paragraph 212 of the NPPF, and other



relevant policies at regional and local level. The Proposed Development is therefore considered acceptable in heritage and townscape terms when assessed against policy.

Landscaping, Urban Greening and Biodiversity

- 8.96 Policy G5 of the London Plan sets out that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
- 8.97 Policy G5 outlines that Boroughs should identify the appropriate amount of urban greening required for new developments. However, in the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target of 0.3 for predominately commercial developments.
- 8.98 At the local level, redevelopment of the Site, as set out in RBKC's Site Allocation under Policy SA1, includes the delivery of landscaping, biodiversity and amenity improvements to the Grand Union Canal.
- 8.99 In addition, Policy GB14: Green and Blue Infrastructure describes developments will be required to contribute to the greening of the borough, enhance habitat to increase biodiversity, and protect/enhance any nearby waterways. The policy goes on to outline that green infrastructure and landscaping should be designed to be fit for purpose and be of high quality and compatible with the surrounding landscape, and townscape character.
- 8.100 In line with the policy requirements above, landscaping has been at the heart of the Proposed Development and proposals seek to deliver high quality landscaping space for future residents, employees and visitors at the Site.
- 8.101 The Proposed Development's landscaping provision comprises large central garden, extending 0.3ha across the middle of the Site, which will include a range of lush and richly planted species that provides residents an opportunity for contact with nature. The landscape has been designed specifically to respond to the environmental conditions and demands on the space.
- 8.102 The scheme's proposed landscaping will include diverse play space and amenity provisions throughout, whilst securing privacy for residents of the ground floor units, and private amenity spaces.



- 8.103 In regard to the canalside specifically, located to the north of Blocks C, D and E, the Proposed Development seeks to optimise play space and amenity areas in sunny spots where buildings have been set back from the canal to optimise this space. This area also includes green corridors along the canal through naturalistic and diverse planting, and allows for further future enhancements of the towpath beyond the Applications' boundary. Railings or dense landscaping and level changes have been provided to guarantee the safety of all children using the play space that is located nearby to the canal.
- 8.104 The illustrative scheme's proposed play space provision is outlined in **Table 6. Proposed Play Space Provision (Illustrative Scheme)** as follows.

Table 6. Proposed Play Space Provision (Illustrative Scheme)

Age Provision	Play Space Target (as outlined in the adopted London Plan)	Play Proposed
Doorstep Play (0-4 years)	1,676m ²	1,108m ²
Local Plan (5-11 years)	1,275m ²	913m ²
Neighbourhood Play (12+ years)	871m ²	0m ²
TOTAL	3,822m²	2,021m²

- 8.105 As shown in the table above, the Proposed Development does result in a short fall of play space across the illustrative scheme. However, further increasing the play space provision on site would compromise requirements for access and urban greening, and would result in play becoming overly dominant which could impact the versatility of the proposed external spaces which aim to cater for all users.
- 8.106 It should be noted additional play space provision is also proposed in the adjacent live application on the Ballymore / Sainsbury's site. Under the masterplan scenario, residents and visitors of the Site would be able to access play space across both sites.
- 8.107 In addition to the above, and in line with London Plan requirements, the Proposed Development has incorporated significant greening measures and will achieve an Urban Greening Factor (UGF) score of 0.4.
- 8.108 In line with policy, the Proposed Development is supported by a Biodiversity Net Gain Assessment, submitted under separate cover. The assessment found the baseline



ecology survey for the site is heavily influence by the existence of a water course that has formed from rainwater in the empty gasholder tanks, since their decommissioning in 2021.

- 8.109 The rainwater is of a poor quality and has existed for a short period of time, however this is attributed value through BNG regulations and accommodates a large area of the site. It is not possible to retain the water due to the requirement to undertake site investigation works and to safely remediate the site to permit development.
- 8.110 The Proposed Development will deliver a significant number of habitats in the end use. In the absence of the aforementioned rainwater ponds, the biodiversity net gain on site would be significant – likely over 150%. However, as a result of the including of rainwater, the proposals will look to secure the Government’s mandatory 10% biodiversity net gain, off site.
- 8.111 Overall, the Proposed Development’s landscaping provision has been designed in line with the overarching national, regional and local policies, and is compliant in regard to children’s play space, urban greening factor and biodiversity net gain. The proposals are therefore considered acceptable and an optimal response to policy with regard to landscaping.

Transport

- 8.112 At the national level, NPPF Chapter 9 ‘Promoting Sustainable Transport’ sets out that national government vision for transport. It highlights the importance of developments giving priority to pedestrians and cycling and minimise the scope of conflict with those users with vehicles.
- 8.113 London Plan Policy T1 ‘Strategic approach to transport’ looks to encourage walking through an improve public realm.
- 8.114 In addition, the London Plan Policy T4 ‘Assessing and mitigating transport impacts’ sets out that development proposals should reflect and integrate with the current and planned transport access, capacity and connectivity - with developments also not increasing road danger.
- 8.115 In regards to the London Plan’s cycle policy, Policy T5 ‘Cycling’ sets out that development proposals should remove barriers to cycling and create healthy environments in which people chose to cycle; and that cycle parking should be designed in accordance with guidance contained in the London Cycling Design Standards.



- 8.116 The adopted London Plan also outlines Policy T6 'Car Parking' which relates to the GLA's parking standards, which set out that car-free developments should be the starting point for all development proposals. The policy confirms that appropriate disabled persons parking for Blue Badge holders should be provided in line with the adopted standards.
- 8.117 At the local level RBKC Local Plan Review Policy TR5: Land Use and Transport requires all development to be located in suitable areas where the transport requirements can be met in a sustainable manner, and which actively encourages travel by sustainable modes. The policy further sets out that large scale developments are required to submit Transport Assessments and Travel Plans.
- 8.118 This is furthered by Policy TR6: Active Travel of the RBKC Local Plan Review which states all new development to maximise trips made by sustainable transport modes by making it easier and more attractive to walk and cycle within the borough.
- 8.119 Moreover, the policy confirms that improvements to the walking and cycling environment are required, including pedestrian and cycle links through new developments and through improving walking and cycling routes to transport infrastructure, social infrastructure, green spaces and town centre uses. The policy makes particular reference to new developments near the River Thames and Grand Union Canal which are required to deliver improved access and connections to the water for walking, cycling and recreation alongside it.
- 8.120 In support of the London Plan Policy T5 on cycling, Part E of Policy TR6 states developments must provide accessible, secure cycle parking facilities and make provision for high quality ancillary facilities that promote cycle usage including changing rooms, showers, and lockers in line with or above current minimum standards.
- 8.121 Policy TR7: Public Transport of the Local Plan Review suggests developments must promote sustainable travel through the delivery of enhancements to existing public transport infrastructure; and, new developments must provide or contribute toward improvements to public transport services, access to them and interchange between them, giving priority to areas that currently have lower levels of accessibility.
- 8.122 More specifically in regard to car parking, Local Plan Review Policy TR8: Car Parking outlines that developments should seek to minimise reliance on private car use arising from new development and promote sustainable travel patterns by managing congestion and the supply of car parking.



- 8.123 In line with the policies above, a Transport Statement has been submitted under separate cover in support of the application.
- 8.124 Under the Standalone Scenario, vehicular access from an upgraded Canal Way, with access to a basement car park is proposed beneath Building B. Beyond this basement access a service road is proposed, which wraps around the western edge of the Site, forming a loop around Block B. Following this, the proposed service loop will have a one-way arrangement, used for servicing and the Transport for London bus route that is proposed to extend to the Site. This was discussed extensively during the pre-application process with TfL, and is deemed acceptable.
- 8.125 In regard to cycle parking, this will be provided in accordance with the London Plan standards outlined in Policy T5 above. The proposals include a mix of two-tier, Sheffield stands, and spaces to accommodate larger cycles such as cargo bikes.
- 8.126 The Proposed Development will be car free, except for the provision of disabled parking, delivered at a ratio of 10% - in line with the requirements of the London Plan.
- 8.127 In the Masterplan Scenario, the above provision would remain except access to the Site would be provided through an internal road network of the Ballymore / Sainsbury's site, eliminating the need for the additional service road and Canal Works Upgrades.
- 8.128 Also under this scenario, the bus services would be integrated with the adjacent Ballymore / Sainsbury's site, removing the need for on-site bus infrastructure.
- 8.129 In addition to the above, a Framework Travel Plan has been prepared as a separate document and is submitted in support of the Proposed Development. The Framework Travel Plan sets out a range of measures and initiatives that aim to encourage a reduction in car use and promote sustainable modes of transport in and around the Site.

Waste, Deliverables and Servicing

- 8.130 London Plan Policy T6 'Car parking' states that all developments should provide adequate provision for efficient deliveries, servicing and emergency access.
- 8.131 This is furthered by London Plan Policy T7 'Deliveries, servicing and construction', in which Part G outlines that development proposals should facilitate safe, clean and



efficient deliveries and servicing - with adequate space being provided for servicing, storage and deliveries which should be located off-street.

- 8.132 On the local level, Policy TR9: Servicing of the Local Plan Review states servicing facilities and coach parking must be well designed, built to accommodate the demands of new development and minimise the number of servicing trips required. The policy confirms that proposals for larger developments, must be supported by a Delivery Management Plan to explain how deliveries would be consolidated (through use of a concierge or mail office) to limit van traffic generation.
- 8.133 The supporting Delivery and Servicing plans, prepared by SLR, set out the Proposed Development's strategy under both the Masterplan and Standalone Scenarios. These are summarised as follows.
- 8.134 First, under the Standalone Scenario, as outlined above, a separate service road is proposed, which wraps around the western edge of the Site, forming a loop around proposed Block B with a priority junction proposed between Blocks A and B. The service road will allow for servicing, emergency vehicles and a potential TfL bus route to access the Site.
- 8.135 In the Masterplan Scenario, the westernmost servicing area is located along the western boundary of the Site and is the only servicing area proposed in detail. This servicing area is accessible via the proposed two-way service road, which is to be used for access and egress.
- 8.136 The Outline Component's proposed servicing and building maintenance comprises a layby along the southern boundary of the Site. Full details of the Proposed Development's servicing and maintenance would need to be provided in future Reserved Matters applications.
- 8.137 The Transport Statement, prepared by SLR, confirms that based on the assessments undertaken and in consideration of the design solutions and mitigation, it can be concluded that the proposed development is acceptable in transport terms under both the Standalone and Masterplan scenarios.

Energy and Sustainability

- 8.138 At the regional level, in line with London Plan Policy SI 2 'Minimising greenhouse gas emissions', major developments should aim to be net zero-carbon. This intends for reducing greenhouse gases through emissions in operation and minimising both



annual and peak energy demand in accordance with the energy hierarchy. Which is: Be Lean, Be Clean, Be Green and Be Seen.

- 8.139 Chapter 4 Green-Blue Future of the RBKC Local Plan Review sets out the Council's policies on circular economy; whole life-cycle carbon; energy and net zero carbon; controlling air pollution, light pollution, odour, noise and vibration; managing flooding and flood risk; protection and enhancement of green infrastructure, biodiversity and trees; as well as waste and contaminated land.
- 8.140 Policy GB2: Circular Economy outlines that major developments must follow circular economy principles and aim to be net zero-waste, and that a circular economy statement meeting the requirements of the London Plan must be submitted.
- 8.141 In addition, Policy GB3: Whole Life-cycle Carbon sets out that major development proposals are required to calculate whole life-cycle carbon emissions, and demonstrate actions taken to reduce whole life-cycle carbon emissions through submission of a whole life-cycle carbon assessment.
- 8.142 In regard to energy and net zero carbon, Policy GB4 of RBKC Local Plan Review illustrates that applicants for all developments must optimise building design to reduce energy demand in-line with the London Plan energy hierarchy. For major applications, the policy states development must be net zero carbon in operation. The policy also sets out that major developments must demonstrate that opportunities for on-site renewable energy generation have been maximised.
- 8.143 The Proposed Development is supported by an Energy Statement produced by Hodkinson Consultancy.
- 8.144 The Energy Statement sets out the Proposed Development's compliance with the prevailing planning policies. This includes: meeting a 10% and 15% reduction in Regulated CO₂ emissions beyond the Part L 2021 baseline for residential and non-residential areas respectively, and an on-site combined reduction in Regulated CO₂ of 35% beyond the Part L 2021 baseline for residential and non-residential areas.
- 8.145 The Statement further outlines that there is a benchmark target of a 50% reduction in CO₂ for the residential part of the development.
- 8.146 The Proposed Development is therefore deemed acceptable in regard to Energy.



Daylight and Sunlight

- 8.147 Policy CD9: Living Conditions of the RBKC Local Plan Review sets out that the Council require all development ensures good living conditions for occupants of new, existing and neighbouring buildings. In order to deliver this, the Council will ensure that good standards of daylight and sunlight are achieved in new development, and that there is reasonable visual privacy for occupants of new development and for occupants of existing properties affected by new development.
- 8.148 In support of the Proposed Development, a Daylight and Sunlight Assessment, prepared by eb7, has been submitted under separate cover. The results below all assume the St William Masterplan Scenario and that the adjacent Ballymore Sainsbury's development is in place.
- 8.149 First, in regard to daylight and sunlight within the proposed residential units, the assessment concludes that the majority of rooms achieve good daylight levels, exceeding the 2022 BRE (Building Research Establishment) targets – notably 76% of habitable rooms in Block B, and 69% of those in Block C will meet or exceed the BRE targets. For the remainder of blocks (A, D, E and F), the daylight potential for these units is a compliance rate of 79%.
- 8.150 Next, regarding sunlight within the proposed dwellings, the assessment shows 56% of the residential units across Blocks B and C will achieve the recommended levels of sunlight of the 21st March, and therefore achieve compliance with the BRE guidelines. The remaining blocks see a combined compliance of 61% which is considered a good compliance rate.
- 8.151 In regard to overshadowing and sunlight within proposed amenity areas, the assessment by eb7 found that within the proposed amenity spaces there are some constraints to the central areas, where there are buildings directly to the south. The remainder of the buildings perform well and are near the 2+ hour sunlight target on 21st March.
- 8.152 The assessment concludes that the proposals have thoroughly considered and designed to respond optimise the daylight and sunlight performance within the scheme and to meet the aspirations of BRE guidance. This confirms the Proposed Development is acceptable in relation to daylight and sunlight.



Flood Risk and Drainage

- 8.153 At the regional level, London Plan Policy SI 12 'Flood Risk Management' sets out that development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed.
- 8.154 In support of the above, RBKC Local Plan Review Policy GB11: Flood Risk outlines that developments must address and reduce flood risk and its impacts. The policy confirms that all development sites in Flood Zone 2 and 3, or those greater than one hectare, require a site-specific Flood Risk Assessment.
- 8.155 In line with the above policies, a Flood Risk Assessment, prepared by PTA Consult, has been prepared in support of the applications. The Statement outlines that the development is located in Flood Zone 1 and therefore has a very low risk of flooding. Furthermore, the assessment outlines that the development's drainage system and levels are designed to accommodate the 100-year rainfall event with a 40% allowance for climate change.
- 8.156 The statement concludes that the proposed development includes significant flooding mitigation measures, and therefore the proposals are deemed acceptable in regard to flood risk.

Fire Safety

- 8.157 The NPPF recognises the importance of ensuring that developments provide access for emergency vehicles and have access to sufficient water supply.
- 8.158 Moreover, the adopted London Plan Policy D12 requires all development proposals to achieve the highest standards of fire safety. The London Plan sets out that major developments should be supported by a Fire Statement.
- 8.159 At the local level, Policy CD16: Fire Safety of the RBKC Local Plan Review confirms that all development proposals must demonstrate that they achieve the highest standards of fire safety. The policy further sets out that major development proposals must have a Fire Statement submitted with the planning application, and tall buildings (of 30m or more) must have a Qualitative Design Review (QDR) panel report submitted with the planning application.



- 8.160 Prior to the application's submission, in April 2025 the Applicant team submitted a QDR panel report to RBKC for their review. A meeting with the panel is due to be held in June 2025.
- 8.161 In support of this application, a Fire Statement, prepared by Introba, has been submitted under separate cover.



9. Planning Obligations and Section 106

- 10.1 Section 106 of the Town and Country Planning Act 1990 (as amended), allows Local Planning Authorities the power to enter into planning obligations with any person interested in the land in their area for the purpose of restricting or regulating the development or use of the land.
- 10.2 Section 278 of the Highways Act 1980 (as amended) allows Highway Authorities to enter into an agreement if they are satisfied that it will be of benefit to the public for the execution of any works to the highway including maintenance.
- 10.3 The Community Infrastructure Levy Regulations 2010 (as amended) provide a framework for how the Community Infrastructure Levy (“CIL”) can be charged. RBKC adopted a CIL charging schedule in January 2015. However, as outlined in RBKC Local Plan Review Policy SA1, the Kensal Opportunity Area is nil rated for Borough CIL so the required infrastructure will be funded through S106 agreements.
- 10.4 Paragraphs 55-57 of the NPPF states that Local Planning Authorities should consider whether otherwise unacceptable development could be made acceptable through the use of planning conditions or obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through planning conditions.
- 10.5 Planning obligations must only be sought where they meet all of the following tests:-
 - a. Necessary to make the development acceptable in planning terms;
 - b. Directly related to the development; and
 - c. Fairly and reasonably related in scale and kind to the development.
- 10.6 With this in mind, we and the Applicant’s planning solicitor, Town Legal LLP, expect that the following heads of terms would be secured by a Section 106 Legal Agreement. At the pre-application stage, several of these obligations were agreed in principle with RBKC:
 - **Application Scenarios** – prior to commencing works pursuant to the St William Development Planning Permission, St William will notify RBKC if the Masterplan Scenario or Standalone scenario is to be implemented.
 - **Housing**
 - The Applicant has worked closely with RBKC in relation to the overall housing proposals, which include 35% affordable housing (by habitable



rooms) and that the proposal will follow the London Plan Fast Track approach to viability. Engagement will continue post submission to work through additional details associated with the make-up of housing proposals, including controls and obligations.

- Affordable Housing to be provided on-site in accordance with the submitted details contained within this Statement. Such affordable housing is to be delivered in accordance with agreed amount, mix and tenure.
- Provision of wheelchair accessible, and adaptable homes, will also be secured.

- **Transport**

- A package of transport measures to mitigate the impacts of the proposed development, informed by the conclusions of the Transport Assessment and in accordance with whether occupations under the St William Standalone Scenario or St William Masterplan Scenario are delivered.
- Safeguarding of land on St William Site for potential future pedestrian bridge over Canal.

- **Travel Plans**

- Draft Travel Plans submitted to support the planning application, and financial contributions towards the monitoring and review of Travel Plans.

- **Employment**

- Mechanisms to be agreed for supporting and encouraging employment of local people in construction or other roles. Measures to support training to prepare people for these opportunities.

- **Energy and Sustainability**

- Obligations to ensure delivery of Biodiversity Net Gain.
- Obligations to secure the delivery of Urban Greening Factor on the basis of 0.4 across the site.
- Obligations requiring compliance with submitted site-wide Energy and Sustainability Strategies and provision of a framework of mechanisms for implementing and monitoring compliance on a phased basis.

- **Estate Management**

- Obligations relating to the agreement and implementation of an Estate Management Plan, including principles associated with public realm access and maintenance.



10. Conclusions

- 10.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004, requires proposals to be determined in accordance with the development plan unless material considerations indicate otherwise. This Planning Statement has assessed the Proposed Development against the development plan and other relevant planning policy and guidance at national, regional and local policy level.
- 10.2 it is clear that both planning applications offer very significant planning public benefits and fully accord with all aspects of the prevailing planning policy framework, and should therefore be approved in accordance with the tilted balance created by the presumption in favour as outlined in the NPPF.
- 10.3 The Proposed Development represents Plot 3 of the Kensal Canalside Opportunity Area Masterplan which comprises the single largest development opportunity area in RBKC. The Applicant's vision is to realise the full potential of this underutilised brown field site to bring forward an exemplar mixed use sustainable scheme with open spaces that contributes positively to the local area.
- 10.4 Across the Site, c.794 – 896 new residential homes will be delivered, including 35% affordable housing. This will make a significant contribution towards RBKC'S housing target of 4,480 new dwellings across the London Plan period of 2021-2031, equating to 448 new homes per year. Under the latest Housing Delivery Test, RBKC have only delivered 855 homes in the last three years against a target of 1,361 which equates to only 63%. This results in the presumption in favour of sustainable development being applied under the NPPF.
- 10.5 In addition to the Proposed Development allowing for the significant provision of new homes, including genuinely affordable homes, the proposed design including height and massing has been carefully design to respond to the sensitive local context. The proposals have been a result of an extensive pre-application stage which has been the Proposed Development take on feedback from RBKC, the Council's Quality Review Panel, GLA, and other key stakeholders including the local community and Historic England. The less than substantial harm that has been identified resultant from the Proposed Development has been significantly outweighed by the substantial public benefits the scheme will bring forward.
- 10.6 The various public benefits of the scheme are as follows:

Social Benefits

- Delivery of much needed new high quality homes, including a significant number of new affordable homes. The Illustrative Masterplan provides 35% affordable housing by habitable room with a policy compliant tenure split that will



significantly aid RBKC in addressing their acute housing need, in addition to contributing to London's housing need more widely;

- Significant new high quality open spaces and improvements to local pedestrian and cycle movement, available to local residents;
- Localised expenditure in shops, food and beverage establishments;
- Local training, skills and employment opportunities during construction.

Economic Benefits

- Delivery of high quality, flexible commercial space on Site, intended to operate as a local café, which will support the local economy;
- A significant package of Community Infrastructure Levy and Section 106 financial contributions to mitigate the impacts of the development and deliver local community benefit;

Environmental Benefits

- Development of a brownfield site in an Opportunity Area allocated for development through a design and landscape led approach to optimise the delivery of new homes and create exemplar new buildings and public realm;
- Significant landscaping which will provide ecology and biodiversity benefits to the immediate site and wider area;
- Site wide urban greening factor of 0.4, in line with London Plan requirements;
- High quality dwellings including genuinely affordable homes with private amenity space, communal landscaping and unit sizes exceeding minimum space standards;
- A car-free scheme, except accessible car parking, to encourage a shift towards a more sustainable travel measures.

10.7 This Planning Statement and the supporting documents as a whole demonstrates the Proposed Development is in accordance with the Development Plan and the NPPF.

10.8 When taking into account all the relevant material considerations, including the relevant national, regional and local policies – and the Site's allocation – the application should be determined in accordance with the Development Plan, including the "titled balance" in favour of sustainable development. The scheme as a whole represents an exemplary form of sustainable development, and it is considered on this



basis that the Proposed Development should be granted planning permission without delay.



Appendices



**Appendix 1 - Site Allocation SA1: Kensal Canalside Opportunity Area (RBKC
Local Plan Review, adopted July 2024)**



Appendix 2. Kensal Canalside Opportunity Area Indicative Height Strategy

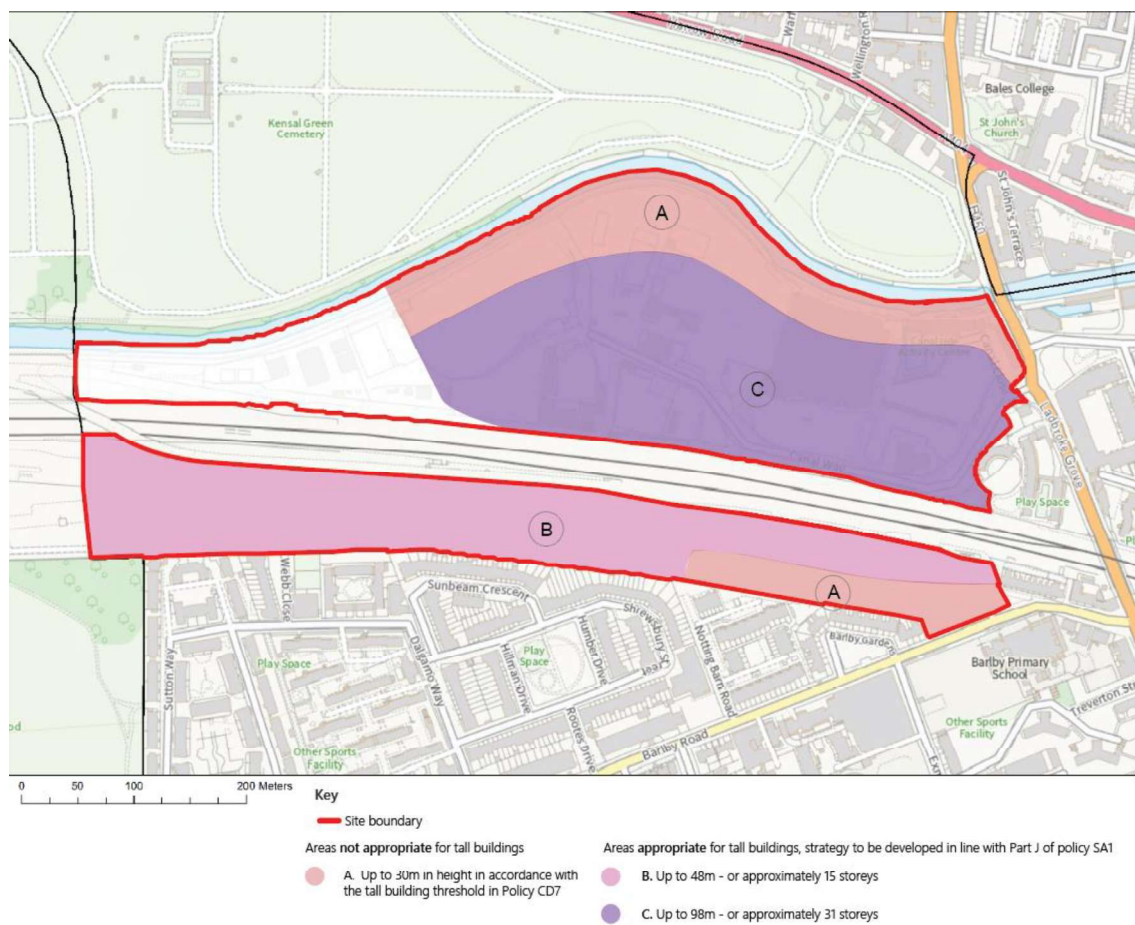


Figure 3.1: Kensal Canalside – Sitewide building heights strategy

SA1: Kensal Canalside Opportunity Area

- A.** Through a design-led approach the site will deliver a high-quality, optimised, mixed-use development to include:

Land use

- B.** Around 3,500 or more new homes (C3).
- C.** Around 12,000 sq m or more of non-residential floorspace (in addition to the relocated supermarket), including workspace, community, and local shopping facilities commensurate with the

site's Neighbourhood Centre designation of which 5,000 sq m is E(g) office, research and development or light industrial, as part of a new Neighbourhood Centre.

- D.** The provision of affordable workspace at 10 per cent of the commercial floor space E(g). This affordable workspace must be provided at a capped rate of 50 per cent less than the prevailing market rate for a period of 20 years.
- E.** The relocation and re-provision of the existing supermarket.
- F.** On-site renewable energy sources.
- G.** The provision of public open space of a scale commensurate to the needs of the development.

Principles

- H.** A high-density development with a high environmental standard in terms of construction, building materials, waste management and energy usage/retention and low levels of car dependency and ownership.
- I.** Tall buildings and the site-wide building heights strategy must not exceed the parameters set out in Figure 3.1. Where tall buildings are deemed appropriate, they must not exceed 98 m from ground level to the top of the building or approximately 31 storeys (Figure 3.1 – Area C) and 48 m from the ground level to the top of the building or approximately 16 storeys (Figure 3.1 - Area B).
- J.** Development to comply with the following townscape principles:
 - 1.** Development along the canalside should be smaller scale, finer grain and varied but continuous, with varying heights creating a continuous horizontal lower rise frontage, with a finer grain and variation of the skyline when seen close-up from Kensal Green Cemetery;
 - 2.** In direct line with the main Kensal Green Cemetery entrance through the gate, the development should create a sense of openness and sky view directly opposite the gate;

3. Greater height in the development should be located further away from the cemetery towards the railway as shown in Figure 3.1;
 4. The development should respond to the coherent range of heights on Ladbroke Grove and avoid overly stark enclosure of the street;
 5. Tall buildings in the development should address the site's entrance and create distinctiveness;
 6. The development should allow for setbacks for tree planting along the canal as part of a comprehensive landscaping plan;
 7. Heights of taller buildings should vary, and the maximum height within the site is limited to distinct points of height;
 8. In views from the east, tall buildings should be clustered along the railway and staggered to allow sky views in between.
- K.** New or improved infrastructure, including a new pedestrian and cycle bridge over the railway, a new pedestrian and cycle bridge over the canal, remodelling of the Ladbroke Grove junction, and new streets that connect the allocation area into its surrounding context and other public transport links.
- L.** The long-term safeguarding of an Elizabeth Line Station.
- M.** Where a short-term or “meanwhile” use is proposed this should make a positive contribution to and be integrated within the wider development.
- N.** Kensal Canalside Opportunity Area is nil rated for Borough Community Infrastructure Levy (CIL) so the required social, environmental, transport and other infrastructure will be funded through s106 agreements including, where appropriate, allocation-wide framework agreements, which can help ensure that s106 contributions towards infrastructure are apportioned fairly and proportionally across the allocation area, make provision for physical infrastructure delivery and maintenance in lieu of financial contributions, and provide a consistency of approach across the allocation area, regardless of when development comes forward.

- O.** Attractive, usable and flexible public realm providing an appropriate setting for mixed-use canalside development which features leisure, education and business uses as well as housing.
- P.** The improvement and relocation within the Opportunity Area of facilities currently provided by Canalside House and the Boathouse Centre if required to achieve comprehensive redevelopment along the canalside and Ladbroke Grove. Any new location should be in an equally accessible location within the wider development.
- Q.** The retention of the area west of the gas holders for the provision of electricity infrastructure. Part of this site may also be required for a gas pressure reduction station, replacing the gas holders. Any buildings must be of a high architectural standard and in keeping with the overall redevelopment of the site.
- R.** The ongoing access to, and respect for, the memorial site of the victims of the Ladbroke Grove rail disaster.
- S.** A suitable setting for the relevant designated heritage assets and opportunities taken to secure the repair or recovery of designated heritage assets which have been identified as at risk.
- T.** A public art strategy to enhance the public realm and quality of the development and contribute to local distinctiveness and character.

Infrastructure and Planning Contributions

- U.** Delivery on site, or financial contributions towards social and community facilities (including health and education) to address increases in demand resulting from the anticipated population change.
- V.** The provision of on-site affordable housing consistent with Policy HO3 and the vision for the area in PLV1.
- W.** Construction and long-term maintenance of (a) a new pedestrian and cycle bridge across the railway line and (b) a new pedestrian and cycle bridge over the canal, which improves north-south access, in the case of the new bridge across the railway line, promote active travel, provide necessary connections to surrounding infrastructure and facilitate the effective integration of the allocation site into the wider area – including rental obligations to safeguard and/or transfer land required to construct and maintain

the bridges and/ or potential Elizabeth line station (including access), where appropriate.

- X.** The provision of on-site public realm and public spaces (to include recreational public space) and improvements to Little Wormwood Scrubs and Kensal Green Cemetery (subject to access through the cemetery and a linking bridge over the canal).
- Y.** Improved transport infrastructure including better bus links, improvements to bus service capacity, improved bus facilities, enhancements and step-free access to Ladbroke Grove underground station, new roads, a new junction to Barlby Road, a road connection towards Scrubs Lane, and improvements to the junctions on Ladbroke Grove including with Canal Way, Kensal Road and Barlby Road.
- Z.** Landscaping, biodiversity and amenity improvements to the Grand Union Canal.
- AA.** A net zero carbon development in line with Policy GB4 including on-site renewable energy sources to serve the new development and form part of a wider development in the future.
- BB.** The overall water infrastructure need (including potable water demand and sewerage capacity) will be informed by an Integrated Water Management Strategy. Surface water runoff rates to be restricted to equivalent greenfield rates.
- CC.** Other contributions as set out in relevant SPDs.
- DD.** Kensal Opportunity Area is nil rated for Borough CIL so the required infrastructure will be funded through s106 agreements. S106 contributions may be payable after the required infrastructure has been fully built as at the date of the relevant s106 agreement such as where there is an element of forward funding of infrastructure by the Council or other body; s106 contributions may be used in full or part to satisfy any funding requirements (including any repayment or recovery and recycling obligations) in respect of forward -funding; pre-occupation or pre-commencement s106 obligations may be considered to ensure that the required infrastructure is in place at an appropriate time before development (or development of a certain level) comes forward.

Height (indicative - subject to impact testing and height strategy)



Proposed pedestrian / cycle link bridge



General height strategy (4 - 20 storeys)



Areas where taller buildings might be acceptable outside of the general height strategy



Key routes



Site boundary

