

Schedule of Responses to the Draft Kensal Canalside Opportunity Area SPD

REF	Name	Comment	Response
1	RBKC Labour Group of Councillors (Emma Dent Coad)	<p>1, TRANSPORT</p> <p>Anyone who lives in the area knows that, especially in Covid months, the traffic in Ladbroke Grove is often at a standstill during rush-hour, and even at times throughout the day. Increasing road traffic without any plan to avoid or tackle it is nonsensical, and against RBKC policy.</p> <p>Road safety in Ladbroke Grove is also very poor. The pinch point outside Kensal House has been the site of numerous road traffic accidents, one with a bus that veered off the road into a wall, and other where a cyclist suffered life-changing injuries at the same spot. The pedestrian crossing is simply not adequate for the number of pedestrians; cycling in that stretch of road is deadly. Crossings as currently conceived around the roundabout are very dangerous, the road is designed for traffic and not for pedestrians.</p> <p>Given the number of new residents planned to live on this site in future, the proposal to deal with them by extending current bus routes into the new area is simply insane. I'm sure planning officers use buses; they should try the no 70, 228, 331 and 52. They are often standing room only</p> <p>2, RAIL TRANSPORT</p> <p>I do hope someone has the patience one day to add up the number of feasibility studies attempting to justify a Crossrail station at Kensal Gasworks. I stopped at £1m. There was never going to be a station there,</p>	<p>Noted.</p> <p>The SPD promotes improvements to local public transport as well as road and junction improvements for the successful delivery of the site. The SPD promotes a largely car free development. New text has been added to clarify that a local network traffic model created for the Council in conjunction with TFL has been created to assess any forthcoming applications.</p> <p>The junction improvements must ensure safe access for cyclists and pedestrians as well as motorists.</p> <p>Noted. The SPD does not preclude further bus routes coming forward.</p>

	<p>and there never will be. I have spoken to residents at the Grand Union Building who paid a premium on their homes in the expectation of a Crossrail station over the road. It was never true.</p> <p>Please stop pretending this ever was, or could be, possible.</p> <p>Due to the above issues it seems that RBKC has come up with the brilliant idea of a £30m foot and cycle bridge over the railway. I truly wish one of those who came up with this unworkable and expensive idea would sit outside Sainsbury for a day and see how many people arrive with walking sticks, crutches, Zimmer frames, wheelchairs to get their shopping. Expecting this huge number of customers to walk over the bridge is an insult, it's contrary to rules of equality, I expect the Council to monitor the type of customers currently using the shop, how they get there, and the full range of physical ability, with an Equalities Impact Assessment.</p> <p>3, I am baffled by the lack of concern for environmental issues which are so prevalent in North Kensington. We have the poorest ward in London with the worst health, and this plan is clearly based on a 1980s vision for development catering for a certain section of society with money and fossil fuels to burn. Where are the trees, green spaces, growing spaces? Where is the plan to tackle existing air pollution from the railway - the second most polluted school in the borough sits beside the railway.</p> <p>4, I see the number of homes being planned for this site has grown, from 2,500 to 5,000. This density is an obscenity. What quality of neighbourhood is our great borough planning here? If it is aiming at the very low bar of the Fulham Gasworks site, which is horrendous, we have learnt nothing. It is just appalling to expect people at any income level to have any quality of life at all packed into this site in high rise buildings.</p>	<p>New bus routes will need to be developed alongside TFL.</p> <p>Noted. The SPD states that any development must safeguard a potential future Elizabeth Line station. However, TFL and Network Rail have confirmed one is not planned to come forward.</p> <p>The SPD states that any bridge will be required to be fully accessible for all including people with disabilities. It will need to work for both pedestrians and cyclists.</p>
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		<p>The Council has been reticent about where the tallest buildings will sit, and who will live in them. It will clearly be highrise against the railway for social tenants. Be honest!</p> <p>5, Finally, for now, the presence of the developer Ballymore on this site fills local residents with dread and fear. The conduct of Ballymore after the recent TWO fires at New Phoenix Wharf has been shocking. How on earth can we trust a developer of our largest site in Kensington, when they have displayed utter disdain and lack of care to their private leasehold tenants?</p> <p>There will be a full response on this draft SPD at a later stage in its development.</p>	<p>Text added that directly references the guidance for developers in the Council's Greening SPD.</p> <p>Streets and Spaces sets out the expectation for a public realm strategy that should include the green and blue network on site.</p> <p>'Environmental and Sustainable Design' includes the objective of delivering an 'Air Quality Positive' development as well as other environmental objectives.</p> <p>Kensal Canalside has been allocated to deliver a minimum of 3,500 homes. The SPD various scenario tests above this to 5000. The SPD promotes high quality development that optimises the delivery of affordable housing and creates a place that people want to live, work and visit.</p> <p>Extra text added to provide clarification on how tall buildings will be assessed. Any application will be expected to submit a height strategy.</p>
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			<p>The Council is committed to ensuring the highest levels of fire safety for every resident in the borough. While we do not control land ownership of the site, any applicants will have to submit a fire statement demonstrating exemplar fire safety standards as set out in the London Plan, 2021.</p>
2	Liz Walker	<p>The document does not give a clear indication of what is being proposed for the site apart from a number of rather nebulous claims of at least 3,500 "high quality" homes and improving access to the canal.</p> <p>How such a large development would "minimise the need for private vehicle use" is beyond me. There is much emphasis on pedestrian and cycle routes but I can see no suggestions of how the already heavily used vehicle crossings over the canal will be improved or supplemented.</p> <p>No development of this scale should be considered until a solution is found to traffic congestion in the area which would no doubt be increased considerably during construction of the site.</p>	<p>The SPD is a high-level guidance document that provides additional guidance on the application of Local Plan policies for the Kensal Canalised Opportunity Area.</p> <p>The London Plan stipulates that inner London Opportunity Areas should be car free developments. The SPD supports improvements to local public transport as well as junction improvements.</p> <p><i>Text added to provide clarification: The Council has developed a local network traffic</i></p>

			<p><i>model, audited and approved by TFL, to assess any forthcoming development proposals.</i></p> <p>A Construction traffic management plan will be required for any application as detailed in the Delivery chapter.</p> <p><i>Text added to ensure bus arrangements are made with TFL during construction.</i></p>
3	Andre Hellstrom	<p>It's for sure an interesting read. I do worry how all these 3500 new home habitants will commute to and from work- Ladbroke Grove is already bottled up. The closest tube station is a 10-15 minute walk. A snail crawls faster than a bus on Ladbroke Grove...</p> <p>I also worry that Kensington and Chelsea borough is 'hiding' away all the poor people in this area building so many affordable homes, North Kensington is already one of London's most deprived areas full of gangs so I think it has to be more balanced.</p> <p>I also worry about architecture. Kensington and Chelsea borough makes sure it looks nice and expensive down in Chelsea but up here, it's all 'automated architecture made by computers. Look at my street, Kensal</p>	<p>Noted.</p> <p>The SPD promotes improved bus, pedestrian and cycle networks. <i>Text added to provide clarification: The Council has developed a local network traffic model, audited and approved by TFL, to assess any forthcoming development proposals.</i></p>

		<p>Road, look at the new building 279 Kensal Road, it's a new building but looks so plane. Is that what we want to leave for the next generation? Look at the student home further up on the street, it's so boring. I kind of like the new 175-177 building coming up, it looks nice but again, most are affordable housing so again, the borough is hiding away all the poor in one pocket so the rich don't have to see them down in Chelsea...</p> <p>I also never understand why so many buildings in London have the top floors made out of 'metal', it looks so cheap and I hope we can move away from that, I just don't see why.</p> <p>So yes, I worry about the traffic and the design of the buildings. I wish the new building would look like Chelsea Barracks (featured in your report), they are simple yet beautiful I also love the new building trend with bricks and colourful tiles. I also love black bricks, like a new building in Kings Cross. I just pray it wont be too plane.</p>	<p>The SPD seeks to ensure a mixed and balanced community. Alongside the Community Housing SPD the KCOA SPD provides additional guidance on the housing policies in the London Plan, 2021 and RBKC Local Plan to deliver affordable housing.</p> <p>Noted. The SPD promotes high quality architecture brought forward through a design code.</p> <p>Noted.</p>
4	Jay Venn	<p>I am concerned about a number of matters in this document; mostly to do with access.</p> <p>Firstly, the proposed bridge over the canal is referred to repeatedly, despite there being no agreement that it will happen. The Cemetery is private property with working hours; it is difficult to see how public access could be securely provided at any time, let alone outside the Cemetery's working hours. The Cemetery is a working Cemetery, with many historically important monuments and a place for reflection: opening it up</p>	<p>Noted</p> <p>The bridge over the canal is dependent upon land ownership issues. However, the SPD promotes the importance of both bridges in the development of Kensal Canalside as a successful place. The SPD promotes a potential route through the cemetery during opening</p>

	<p>to bicycles would totally change its character, and create environmental degradation (see the damage done by illegally ridden bikes in the 'wildlife' area of Queens Park as an example) .</p> <p>The other bridge, over the railway raises a query too: given the difference in levels between the two parts of the site, is this actually feasible without a massive 'offramp' on the south side?</p> <p>The document is also disingenuous about the unlikelihood of there ever being an Elizabeth Line station on the site.</p> <p>The document refers to '3,500' new homes, but in smaller print admits that this may well rise to 5,000; it would be more honest to admit this rather more openly.</p> <p>Given the density of housing, little mention is given to the added inevitable congestion on both entry points at Ladbroke Grove and Barlby Road; it would be interesting to have more details on the design proposals for dealing with both of these pressure points.</p> <p>The document talks about a 'step change in scale' and spuriously cites Trellick tower as a height reference, despite the fact that it is not really near the site: a better datum point would be the taller blocks of the Burleigh of Balfour estate, just south of the site. These blocks are nothing like the 20 stories proposed in the consultation. 20 stories is too tall for such a narrow site.</p> <p>I am also more generally concerned about the 'Environmental considerations' mentioned in the construction plans - more precise details on this should be made mandatory on the development in order to demonstrate a real commitment to carbon neutral building.</p>	<p>hours. Maintenance/ security arrangements would need be developed in any forthcoming applications.</p> <p>Text has been added to clarify that any application should include a heritage impact assessment. This would include the impacts of any route through the cemetery on heritage.</p> <p>Studies showed the impacts of a road bridge given the necessary infrastructure was large on the viability of land to the south and the design and relationship with communities to the south owing to land levels. However, a pedestrian cycle bridge is fa smaller and can be incorporated into the design of buildings/ landscape.</p> <p>The SPD is clear at section 1.7 relating to the various capacity tests for the site and the ranges this included.</p> <p>The London Plan stipulates that inner London Opportunity Areas should be car free developments. The SPD supports improvements to local public transport as well as junction improvements.</p> <p>Text added to provide clarification:</p>
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			<p><i>The Council has developed a local network traffic model, audited and approved by TFL, to assess any forthcoming development proposals.</i></p> <p>Noted. Text has been added to clarify how taller buildings will be assessed in line with the London Plan, 2021. The text regarding Trellick Tower referenced as a local tall building that can be referenced as a landmark within the vicinity of the site has been removed. Any tall building assessment will be in line with Policy D9 of the London Plan.</p> <p>Environmental sustainability is a 'golden thread' that runs through out the SPD. The SPD can only provide further guidance to the adopted development plan policies. Specific objectives are highlighted at section 6.3 whereby further text has been added relating to the Greening SPD which provides further guidance for developers. Further detail is not possible without a masterplan at application stage.</p>
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5	Joe Thuraisamy	<p>The consultation document is very well-detailed and proves it has taken into account both legal requirements and locals' opinions. As a local myself I agree with all the actions and plans you have laid out and am very excited about this opportunity.</p> <p>One area that was not clear (or I missed it in the documentation) was the layout of the superstore: I would much prefer a higher-density building (i.e. on two levels) with limited parking facilities (think Waitrose at Bayswater) to integrate the superstore into the urban fabric rather than spreading it out with a carpark and over-sized single storey building.</p> <p>Thanks in advance though- the plans look very exciting and I'm looking forward to seeing the development unfold!</p>	<p>Noted.</p> <p>The indicative superstore layout is included in the map at 5.3 and is wrapped by residential development. The size of the store in indicative plans has not been reduced. The SPD promotes associated parking to be located below the superstore.</p>
6	Marie Costigan	<p>I welcome investment in the area with the prospect of new affordable housing and more jobs. A new Elizabethan line station would also greatly improve the travel infrastructure (there is a Bakerloo line station at Kensal Green, but the majority of Bakerloo line trains stop at Queens Park with only about a third going on to Kensal Green and beyond). Widening the towpath would be very welcome as there isn't sufficient space currently for walkers and fast bicycles. Some retail and hospitality opportunities, such as canalside cafes like at Paddington Central, would be a great addition to the area.</p> <p>I am very concerned at any potential impact on Kensal Green cemetery, however. It is of national historical interest and is an oasis of calm and natural wildlife in the middle of the city. A proposal to have a major access route to the new canalside development through the cemetery is completely inappropriate. This is an active working cemetery and the unique atmosphere of the place would be completely destroyed by imposing a designated cycle route through it. It would create noise and</p>	<p>Noted. The map at 5.3 shows the indicative locations for the neighbourhood centre where non-residential uses would be located.</p> <p>The value of the cemetery has been clarified in the SPD with additional text.</p>

		<p>disruption for people visiting the graves, and would inevitably create litter. The proposed path shown on the map in the consultation document is unsafe for bicycles; at its lowest point it becomes submerged after periods of heavy rain and is muddy for most of the winter. It is also completely impractical to have a path open at evenings when the cemetery is closed, and must increase the risk of vandalism and the graves being desecrated.</p> <p>So, whilst I understand the desire to link the area north of the canal so it fully benefits from a new canalside area, the proposed route to do so needs much more thought and should not include the cemetery at surface level.</p>	<p>The SPD is clear that the success of a bridge will be dependant upon early engagement with the Cemetery company. The maps in the SPD are indicative and any route through it will need to be further developed prior to the submission of a planning application.</p> <p>Text has been added to clarify the importance of the cemetery and require that any application should include a heritage impact assessment. This would include the impacts of any proposed route through the cemetery.</p> <p>Noted.</p>
7	Tim Schoeler	<p>I believe that 3500 or more homes will be detrimental to the appeal of the area. Furthermore I don't believe that after covid/Brexit that many new flats will be needed. The density and the high rises are going to destroy the Charm of the area.</p> <p>I suggest a limit of 3-5 storeys for all buildings. The traffic is already a night mare and additional residents will just lead to a collapse of it. Additional buses are not adding anything if they are just stuck in traffic as they are already.</p>	<p>Kensal Canalside has been allocated to deliver a minimum of 3,500 homes in the Local Plan.</p> <p>New text added to clarify how tall buildings will be assessed in line with Policy D9 of the London Plan.</p> <p>New text has been added to clarify that a local network traffic model created for the Council in conjunction with TFL has been developed to assess any</p>

			forthcoming applications. The SPD supports a largely car free development in line with the London Plan.
8	Projected Image Ltd (David Douglas)	<p>I share you aim of improving the area around Kensal Canalside ("KC") and of delivering new homes to Londoners. The report is correct that this area can be greatly improved.</p> <p>My major concern is that public transport for such a large development have not been thought through. My worry arises from a presentation given to residents of my building before the Covid crisis where your planners suggested Kings Cross was a successful model of development. Kings Cross is on 6 Tube lines, there is currently no tube at KC.</p> <p>The draft planning document repeatedly refers a "proposed" new station on the Elizabeth line, in the centre of the development, however I understand this new station has not been agreed is unlikely to be any time soon. That leaves Ladbroke Grove, a 15 minute walk away as the nearest tube. You are no doubt aware of the shortcomings of this station - poor infrastructure and infrequent services on one line only. Other tubes are further away.</p> <p>Bus access the area is also poor as Ladbroke Grove is a traffic choked with the 2 pinch points of the bridges over the canal and the train lines making any improvement unlikely. A pedestrian and bike bridge will be nice to have but not real solution to transport in the area, where many residents work in the City or West End. Cycling to these destinations along some of London's busiest roads is for the brave only and not to be contemplated in the rain.</p>	<p>Noted.</p> <p>Text has been added to clarify the expected contributions to the underground network.</p> <p>New text has been added to clarify that a local network traffic model created for the Council in conjunction with TFL has been developed to assess any forthcoming applications.</p>

		All in all, I oppose a development of this size until the public transport is sorted out.	Noted
9	Progressay Impact CIC, (Moktar Alqaderi)	<p>My name is Moktar Alqaderi and as someone that runs a number of organisations in the borough, I would like to share my thoughts on the SPD. I am already in communication with your colleague, Felipe Villela who has advised that I also share my thoughts here.</p> <p>Before I continue to share some ideas I have, I wanted to provide a little context for my own experiences. As a teacher, lawyer, and community leader, I have worked for over a decade with a countless number of folk from all different backgrounds in the borough. Examples of my work include previously running an award-winning employment programme before going on to teach at Kensington Aldridge Academy, prior to the tragic fire, which tragically claimed the lives of some of my students.</p> <p>Today, I run a number of organisations, including:</p> <ul style="list-style-type: none"> - Progressay, a pioneering innovate-UK-backed, A.I. driven ed-tech start-up; - Progressay Impact C.I.C, our charitable arm that works to enhance employment and employability as well as; - Notting Hill Law, an innovative web-first law firm of the future. <p>However, I bring the unique experience of having worked both for and with the Council. On the one hand, as mentioned, I have played a leading</p>	

	<p>role in the voluntary sector over the last decade. In this capacity, I have worked successfully with the Council for many years, from my first job-ready programme back to 2013 that was funded and supported by Councillor Catharine Faulks, to receiving funding through the RBKC Grenfell participatory budgeting project. However, I happen to have also been directly employed by RBKC; during my gap year some years ago, I worked as a 'Customer Service Advisor' under the lovely Rebecca Hennessy, at the Town Hall.</p> <p>Much like the goals set out in the Workspace Strategy you shared, through Progressay Impact, our mission is to reduce poverty-driven crime by providing real, paid opportunities to young people. With this in mind, I agree with a number of findings in the report. This includes:</p> <p>1. "There has been a lack of partnership and poor coordination between the council and voluntary sector and within the local voluntary sector in North Kensington..."Post-Grenfell, there has been a significant increase in the levels of community mistrust in institutions and large organisations." (p6) / "There is an opportunity for better partnership and coordination between the council and voluntary sector and within the local voluntary sector in North Kensington." (p6)</p> <p>I can attest to the fragmented, territorial workings between organisations in the sector. We have not been working together, but rather, everyone has been trying to reinvent the wheel. This is starting to change though. One example of this is a cross-borough project founded and led by a pioneering colleague of yours, Clive Hornsby (CC'd). Clive has set up an amazing group of organisations to deliver services in the South of the Borough, which now includes the Police and Chelsea Football Club as well as a collection of local organisations. This inclusive and cooperative model, from my experience, has never been done so well before. I would</p>	<p>Noted</p>
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	<p>suggest if he hasn't been so already, that Clive should be consulted to explore how his model can be reproduced for this project.</p> <p>2. "Kensal, North Kensington and RBKC all have higher numbers of local creative jobs than residents who work in the creative sector. This suggests that the locality is importing its creative workforce and hence, the opportunity to involve local residents in this sector is not currently being fulfilled. This suggests that alongside any provision of creative space, there should be a focus on support to help local residents better engage with the sector and the opportunities therein." (p5) Indeed, it is my experience that I see many locals are left unemployed as jobs are being filled by others coming in externally.</p> <p>3. "To be successful, the evolution of Kensal's creative economy needs to happen in the most inclusive way possible. Perhaps more than any area in London due to the recent Grenfell Tower tragedy, the evolution of any economic strategy in North Kensington needs to find a balance between economic opportunity and genuine social and community purpose. There is an opportunity to involve local residents in the Creative Sector as this is not currently being fulfilled." (p5) Local talent is abundant. I will say that before we can look at connecting aspiring locals with exciting opportunities, we need to look into why there is such a disconnect here.</p> <p>4. "Rising workspace costs and the recent monopoly of incoming higher-end workspace providers threatens this is seen somewhat negatively by long-standing businesses." (p7) Agreed. With Progressay, our first office was at Canalot Studios though, due to a number of issues including the high cost of rent, we then moved to the cheaper Pall Mall Deposit until Corona meant we could no longer</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p>
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	<p>access our own office!</p> <p>5. "In recent years, Kensal has seen significant growth in creating employment in the IT, Software and Computer Services sector." (p5) / "There are a high number of start-ups and SME businesses moving to the area, with significant growth in creating employment in the IT, software and computer services sector." (p7)</p> <p>I have directly contributed to this. Inspired by experiences teaching, I founded Progressay in 2017, which is an A.I.-driven ed-tech start-up that helps teachers reduce workload by automating essay marking. Progressay is booming right now: we recently delivered successful auto marking trials to Pearson, the biggest education company in the world (see: https://edtechnology.co.uk/comments/ai-powered-teacher-facing-tools-are-much-needed-innovations/), as well as with Warwick Business School, were awarded the UCL 'Edward', featured in the Education Foundation's 'Ed-tech top 50' publication and were awarded an Innovate UK grant for our pioneering tech. Most recently, Eton and Harrow have expressed an interest in trialing our platform.</p> <p>However, I disagree, or at least take issue, with some of the points raised or that have been missed.</p> <p>This includes:</p> <p>1. "Following the research, the top creative business sectors and therefore those that could be targeted for the KCOA include:</p> <ul style="list-style-type: none"> — Info and communication: sound, video, and photo — Services: design and architecture — Fashion and textiles: commerce, design, and manufacturing — Third sector organisations" (p7) 	<p>Noted</p> <p>Noted</p>
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		<p>Despite finding that tech is on the rise, the report does not recommend this as an area for growth- why?</p> <p>2. "For such businesses, access to the area's large pool of freelance artists and makers allows businesses to increase their employment size in relation to the scale of individual contracts." (p5) This contradicts the statement "...the locality is importing its creative workforce..." (p5). If businesses are setting up here to access local talent, why would they then need to import talent from elsewhere?</p> <p>3. Most pertinently, there are some crucial points missing, paramount of which is an attempt to explain why the area is the way it is.</p> <p>We must turn to history to answer this question. From the slums of the '50s to the murder of Kelso Cochrane, to the birth of Claudia Jones' famed 'Notting Hill carnival', the area has transformed over the years through a process of gentrification into becoming globally synonymous with Richard Curtis' "Notting Hill". It is our area's history that explains why we have such an uneven distribution of wealth. This goes someone what to explaining why we have millionaires, many of whom I admire greatly and have had the pleasure to engage with, living alongside children in poverty. I experienced this stark divide during my time working for RBKC in the Customer Service Centre; in my role, I would often alternate from addressing housing matters with individuals sleeping rough to then advising on the process for pre-planning applications in relation to multi-million-pound developments from some of our borough's wealthiest residents. I also experienced this later in my role as a teacher at KAA where I would often see pupils having to keep days-old rotting fruit in their school bags for fear of having nothing else to eat.</p>	<p>Noted. The report focuses on the creative sectors found specifically in the locality and how the SPD could support them. The SPD does not preclude tech companies from being a focus for growth.</p> <p>The report does not suggest that businesses cannot do both. The report acknowledges the benefits of</p>
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	<p>I direct you to read and share Emma Dent-Coad's insightful article 'The most unequal borough in Britain - revisited. Inequality and inequity in Kensington and Chelsea' (attached) for more on this. Some stats cited of note include:</p> <ul style="list-style-type: none"> - "child poverty in 2020, according to Trust for London, is 38%, actually worse than the London average of 37%"; - "some households have an annual income of just £18,000, while others have £1.8m" - In 2019, Kensal Town in Golborne, Index of Multiple Deprivation "level of 59%" which was "a full six percentage points worse than in 2014" and surpassed "Stonebridge Park in Brent, at 57%" in terms of deprivation! Chelsea Manor comes in at "7.6%". - "...the worst two K&C neighborhoods for income deprivation are in Golborne ward, at 38.9% in Kensal Town, and 37.9% in Southern Row." - "The Kensal Town neighborhood near Trellick Tower in Golborne ward has the worst level of education and skills in the borough, with 28.8% deprivation in this category. Meanwhile, a ten-minute bus journey away, Hillgate Village area next to Notting Hill Gate has just 1.8% deprivation in this category" - "Kensal Town in Golborne ward... has nearly one-third of the working-age population looking for work, 31.7%. This is 100 times worse than the working-age proportion who are unemployed in the Chelsea Manor neighborhood of Royal Hospital ward." <p>As you can imagine, such levels of poverty will inevitably lead to crime.</p> <p>Despite being the smallest borough in London, Kensington and Chelsea has the second-highest rate of crime for all boroughs (112.7 per 1,000 people). Over half of all crimes committed in Kensington and Chelsea are theft and burglary. This suggests most crime is poverty-driven, which is</p>	<p>businesses being able to use both local workforce and having good connections to allow for different contracts.</p> <p>Noted. The SPD is only able to provide additional guidance to existing policies withing the Development Plan.</p>
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	<p>supported by the data around deprivation (see above). Anecdotally, I have personally seen young people get involved and be the victim of very violent, heinous crimes. My own brother was violently stabbed with a zombie knife and robbed for his coat in Maxilla, only months ago- imagine my horror upon learning that those responsible were in fact previous students of mine! At least two of my students were permanently excluded from KAA for bringing knives to school. One of these young men was later stabbed in the chest in Portobello. Yet another case for preventing schools from excluding such kids.</p> <p>Suggestions:</p> <p>Ultimately I believe this project has the potential to provide a very real opportunity to genuinely help some of the poorest people in the borough. I think with community buy-in, there could be a great opportunity to engage with some of the most deprived pockets, increase employment and subsequently reduce crime.</p> <p>There are three ideas I have. These are:</p> <p>1. Community-led training/recruitment: In the first instance, the project could provide an amazing training and employment opportunity. Achieving this would entail creating a process of identifying prospective young people, including from hard-to-reach groups that are deemed at-risk, many of whom I know very well, screening, training and eventually employing participants for this project.</p> <p>2. North Kensington Tech Bootcamp: Another possible way to help young people could be to set up a pioneering new community-led Coding Bootcamp that can allow for rapid job-ready training in technical skills. From my experience, in light of the</p>	<p>Noted the SPD sets out at section 1.4 how the development should ensure opportunities for all, including existing residents in the surrounding area.</p>
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	<p>recent boom in technology caused by Covid, I think there is an opportunity to make North Kensington a world-class hotbed for technical talent by setting up a lean coding training centre. I would suggest such a provision would adopt the proven "coding Bootcamp" models of silicon valley, that I myself adopted when learning to code. I would also suggest that such a provision should particularly target young girls who are severely underrepresented in tech.</p> <p>Evidence of achieving rapid regeneration by upskilling deprived communities in tech can be seen from as far afield as Africa (see- "Tech revolution turbocharges Africa's economy": https://african.business/2020/02/economy/tech-revolution-turbocharges-africas-economy/) to Chicago (see Chicago's 'BLACKSTONE INCLUSIVE ENTREPRENEURSHIP CHALLENGE, attached).</p> <p>3: Access to law: The report correctly identifies the prevalence of creative industry in the area. However, It fails to explain why this is the case.</p> <p>Historically, North Kensington was a deprived area, which allowed for the poorest to settle. This in time, attracted future waves of immigrants, seeking to live near friends, family or at the least, in an area, they could afford to live in. Such a demographic typically had lower educational attainment and lower rates of employment. One reason behind the latter was due to discrimination, which meant many ethnic folk were particularly not welcomed openly in professional industries, such as the legal profession. By contrast, the arts were open to anyone that was interested. Thus, over time, North Kensington has evolved into a hub for creativity, exploding with music, art, food etc.</p>	<p>Noted.</p>
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		<p>As an aspiring lawyer that grew up in Ladbroke Grove, I was the first person in my family to go to University. However, upon graduating, I did not have the networks to secure training opportunities. I actually went into teaching because I couldn't get into law and even after qualifying as a teacher, I still wouldn't have been able to pay the £15k fees for the Legal Practice Course, but for a scholarship, I was fortunate enough to stumble upon. It is for this reason that I want to democratise access to the legal profession. As a lawyer now that runs my own firm, I would be interested in setting up an innovative work experience-based programme to train young people in law.</p> <p>I understand these ideas will likely need to be pitched to 'Project Flourish' along with others, but I would be keen to hear your thoughts if possible?</p>	<p>Noted. Section 5.2 – Employment Skills and Training sets out some of the ways that the Council will look to ensure employment opportunities at the site.</p> <p>Noted. This sits outside of the remit of this SPD. However, the SPD does not preclude developers from developing this provision.</p>
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			<p>Noted. Whilst this sits outside of the remit of this SPD, the SPD does not preclude this from coming forward at a later stage.</p>
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10	Charlotte Creed	<p>I hope this plan includes widescale consultation with local North Kensington people and addresses the real housing and medical needs of the lower income long term members of that community rather than pushing them out and replacing them with people with no long-term presence and who can afford to buy luxury flats.</p>	<p>Noted. Extensive early engagement was undertaken in the development of the SPD and a formal 6 week consultation of the draft SPD. The aim of the SPD is to provide guidance to existing Development Plan policies. The SPD sets out at section 1.4 how the development should ensure opportunities for all, including existing residents in the surrounding area.</p>
11	Tanya Southworth	<p>The proposal document appears to be flawed and disingenuous in many aspects. It is more of a glossy presentation than a document that properly details what the developers really have in mind for the site.</p> <p>They are talking of a MINIMUM of 3,500 homes, it could go up to 5000, which is a lot.</p> <p>We believe it is purposely misleading in how it suggests there could be a new railway station and a link across to Kensal Green station through the cemetery. The station is not planned and the link is probably unworkable and on private land that does not relate to the site.</p> <p>There is no detail about how any access through the cemetery would be supervised.</p>	<p>Noted.</p> <p>Kensal Canalside has been allocated to deliver a minimum of 3,500 homes in the Local Plan. The SPD sets out the Council's approach to ensuring the optimum delivery of high quality affordable homes given the housing needs of the Borough.</p> <p>Noted. The SPD confirms at section 7.3 that an Elizabeth Line station has not yet been proven feasible and no further feasibility work is anticipated within the</p>

		<p>There is talk of a cycle route through the Cemetery - bikes should not be allowed in to the Cemetery; it is a working cemetery, not a nature reserve.</p> <p>The most alarming matter when it starts to address density and block height.</p> <p>It is very vague apart from the horrific reference to Trellick tower in terms of a height reference for the higher blocks.</p> <p>They are saying they could build up to 20 stories high on any part of the site, not just the lower south side; mentioning the Trellick tower as a referable height is a red herring – the tower is not nearby. We believe no buildings should be higher than 10 Storeys.</p> <p>Ballymore were the developers of the recent fire in a block in Canary Wharf.</p> <p>Also how will Ladbrooke Grove not be impassable for many years while the work is going on? It was hardly dealt with on the recent zoom call with the developers.</p> <p>The commitment to providing social or affordable housing is scant and Ballymore are more of a luxury developer going by their property portfolio.</p> <p>Many developers promise much in terms of affordable housing and then withdraw, stating financial non feasibility.</p>	<p>lifetime of the Local Plan. Transport for London and Network Rail have confirmed that for the foreseeable future they will be concentrating on nationally significant infrastructure projects. The SPD allows for the potential provision of a station if it was to come forward in the future. The expectations are clearly set out regarding development in the absence of a station.</p> <p>The SPD route through the cemetery is indicative only. This detail would be expected at planning application stage and should be brought forward in conversation with the Cemetery Company. The use of any route would need to be agreed by the Cemetery company and the Council with the involvement of Historic England.</p> <p>Reference to Trellick Tower has been removed and new text added to clarify how tall buildings will be assessed in line with Policy D9 of the London Plan.</p> <p>The Council is committed to ensuring the highest levels of fire safety for</p>
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		<p>RBKC will need to provide assurance that they will not accept a withdrawal of social housing post approval.</p>	<p>every resident in the borough. While we do not control land ownership of the site, any applicants will have to submit a fire statement demonstrating exemplar fire safety standards as set out in the London Plan, 2021.</p> <p>New text has been added to clarify that a local network traffic model created for the Council in conjunction with TFL has been created to assess any forthcoming applications.</p> <p>A Construction Traffic Management Plan is required of the developers as set out in the Delivery chapter. The Council do not control land ownership of the site.</p> <p>The policy position on affordable housing is established in both the Local Plan and London Plan. The SPD is clear in its promotion of delivering the optimum number of affordable homes on the site.</p> <p>The Council policy requires the delivery of the maximum reasonable level of affordable housing and would seek to secure this through any planning application.</p>
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12	Avalon Microwave (Hugh Levinson)	<p>I only just realised that this is happening and haven't had time or enough computer memory to look at all the details so far.</p> <p>Nevertheless, I am worried that this development will follow others in the locality and proliferate excessive (I think you probably know what I mean) high rise buildings.</p> <p>Apart from being out-of-place (as far as I am concerned) in West not Central London, these high rise buildings are steadily destroying the wonderful skyline(s) that can / could be seen from Wormwood Scrubs. At the moment the existing developments spoiling the view are at the top of Old Oak Common Lane, Gipsy Corner (North Acton), and near where the Guinness factory was in Park Royal. (I am ignoring the Hospital, Imperial and White City developments to the South. The threatened high rise on Scrubs Lane just North of the Canal and, of course, yet undecided developments in the 'Car Giant' and now this Ladbroke canal side development just add to the possibility of a disappearing skyline.</p> <p>I would also hate that the view of the City tall building (built in a much more sensible place) from the Scrubs (have you seen it?) could be lost by the placement of more local high rise developments.</p> <p>The Scrubs is a unique area with so many good features that is, currently, being attacked on many sides. I guess the sponsors of each 'development' argue that their project is not too bad but, when all are put together, one can see that the nature of the Scrubs will be destroyed – death by a thousand cuts!</p> <p>The quality of planning and design seems to bow to the developers wish for very high density with resulting poor amenity space. Eg the number of</p>	<p>Noted. New text added to clarify how tall buildings will be assessed in line with Policy D9 of the London Plan.</p> <p>Noted. The SPD requires both a height strategy for the sites coming forward and also the submission of a design code to ensure a high quality well designed development comes forward. This is in line with policies in the London Plan.</p> <p>Noted. The Council note this view is not protected. However, given the site context in relation to Wormwood Scrubs park views are unlikely to be significantly affected by</p>
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		<p>extremely close high rise blocks in the White City and Gipsy Corner developments - a modern sort of Napolitan alley but without the charm! Compare with the three elegant high rise blocks alongside the West Cross Route and the Silchester blocks where an attempt was made to spread out the buildings.</p> <p>I also thought that high rise has been shown some years ago to be pretty socially damaging for a whole number of reasons – but this now seems to have been largely forgotten but the current council planners (too young?).</p> <p>And, I am almost struck dumb by the horrendous monolithic block(s) so ridiculously close to the pavement that will block out so much light that have are appeared on the old Homebase site at Gypsy Corner (A40 / East Acton). Again, cf the much more acceptable block of flats built where the cinema once was. The greed of the developers, and the weakness of the council, are typified by the developers asking for (and getting, so I believe) 3 more stories after initial planning permission had been granted - an old trick, I presume. And I won't dare go into section 106! agreements!</p>	<p>developmenton the Kensal Canalside Opportunity Area site. . The park is sited within an urban area and the context will change over time.</p> <p>Kensal Canalside has been allocated to deliver a minimum of 3,500 homes in the Local Plan. The SPD seeks to ensure the optimum number of high quality homes on the site. Public space is also a key feature within the streets and spaces chapter of the SPD and it sets out how this should come forward.</p> <p>The London Plan sets out clear guidance on the acceptability of tall buildings and how they can be used successfully. New text has been added to the SPD to clarify how tall buildings will be assessed in line with Policy D9 of the London Plan.</p>
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			Noted
13	Noel	<p>As a local resident, I would like to note the following concerns:</p> <ul style="list-style-type: none"> - the proposed plan doesn't bring any amenities for the local neighbourhood while placing strain on local services. Suggest a requirement is placed on the developer to ensure additional amenities are provided for the neighbourhood and not just flats - there is a huge range in the number of properties to be built. Suggest this is capped at the lower end given access issues to the site - the proposal to link to Kensal Green through the cemetery seems unworkable and that station doesn't have capacity for additional capacity without more through trains - the proposal is not clear on how the development will impact on Ladbroke Grove traffic and for what timeframe. There are already horrendous delays with any sort of roadworks - it should be clarified the total height of the towers and capped at ten stories maximum 	<p>Noted the SPD highlights the importance of the development being an Opportunity Area for all, including existing residents in the surrounding area at section 1.4. The SPD sets out how the development is expected to bring forward a new neighbourhood centre, new superstore and improved connections and job opportunities.</p> <p>Noted, Kensal Canalside has been allocated to deliver a minimum of 3,500 homes in the Local Plan. The SPD sets out the Council's approach to ensuring the optimum delivery of high quality affordable homes given the housing needs of the Borough. Any forthcoming applications must ensure that adequate infrastructure is secured.</p> <p>Text has been added to clarify the expected contributions to the underground network to ensure that capacity is managed.</p>

			<p>New text has been added to clarify that a local network traffic model created for the Council in conjunction with TFL has been created to assess any forthcoming applications.</p> <p>The SPD is unable to place a 'cap' on development. However, new text has been added to clarify how tall buildings will be assessed in line with Policy D9 of the London Plan.</p>
14	Joanne Robinson	<p>I am very concerned about this development. 3500 homes is huge .. are you building a new school to be able to deal with such a huge increase in residents? New surgeries? The traffic will be shocking during the development and beyond .. how will this be managed?</p> <p>How will the infrastructure change? How long before the development is complete? Where will the current community be able to do their grocery shopping?</p> <p>I am not in favour of it at all .. can the development not be scaled down? Traffic is already horrendous and I just dont know how the area will cope with this many new residents / cars etc.</p>	<p>The 'live work visit' chapter sets out how associated social infrastructure will be expected to be delivered alongside any development.</p> <p>A construction traffic management plan will be expected to be submitted with any planning application to ensure that traffic during construction is managed as set out in the delivery chapter.</p> <p>The supermarket is included in the SPD to be reprovided in a location that would allow for the current supermarket to stay open until the new one is ready. Sainsbury's have been in</p>

			<p>discussion with the Council and would like to ensure continuous opening for customers and as such will not close the current store until a new one is open on the site.</p> <p>Kensal Canalside has been allocated to deliver a minimum of 3,500 homes in the Local Plan. The SPD promotes a largely car free development. New text has been added to clarify that a local network traffic model created for the Council in conjunction with TFL will be used to assess any forthcoming applications.</p>
15	philippe noel	<p>The scheme is totally unviable as proposed. It is fundamentally unsound. Whilst in theory the idea is excellent to create these homes in the area, the site in question is incapable of accommodating so many homes in the way the scheme is designed. These reasons are set out below:</p> <p>The access to the site is totally unworkable. Access to 3,500 homes is currently envisaged through a single lane road onto a cul-de-sac on the northern site and a further single lane road onto a cul-de-sac to the south. Furthermore, the artery road that feeds both of those is Ladbroke Grove, a road which is already extremely busy - it and the surrounding roads simply cannot handle the additional people movement the scheme will create. Even if they all walked and took public transport, the site is already nose to tail traffic, so inhabitants would be stuck in perpetual gridlock and the surrounding area would suffer inconceivable levels of traffic from the extra public transport.</p>	<p>Noted.</p> <p>The SPD promotes a largely car free development. New text has been added to clarify that a local network traffic model created for the Council in conjunction with TFL has been created to assess any forthcoming applications.</p>

		<p>It will also prevent the emergency services from serving the new and existing residents in the area and as such is dangerous. It MUST have an additional full road access either to the north, south or west. A part time pedestrian access point to alleviate this is simply not the same nor anywhere near enough. I also note that the impact of construction of the site would also be even worse during the initial phase when the site is being built. If road access were secured across the site and the two parts of the site are linked by roads then I would be happy to support the site's access.</p> <p>Additionally, the heights envisaged under the scheme are far too high. The local area is capped well below 10 storeys and this site MUST be the same. There are a couple of local eyesores that do stand above this level, but these are exceptions that local residents have desperately been trying to unwind and have to live with. We cannot have more which would then allow the whole area to become a high-rise area which is totally out of keeping with the whole of the local neighbourhood.</p> <p>In terms of local transport access, the site should add a crossrail station. It would help immeasurably with the access to the site and to the area.</p> <p>Otherwise, I welcome the redevelopment of the local site.</p>	<p>Applicants will need to ensure that emergency service access provided for the site as part of any masterplan. Policy T6 of the London Plan, 2021 sets out requirements for developments to ensure emergency access provision. The Council is committed to ensuring the highest levels of fire safety for every resident in the borough. While we do not control land ownership of the site, any applicants will have to submit a fire statement demonstrating exemplar fire safety standards as set out in the London Plan, 2021.</p> <p>A construction traffic management plan will be expected to be submitted with any planning application to ensure that traffic during construction is managed as set out in the delivery chapter.</p> <p>The SPD is unable to place a 'cap' on development. However, new text has been added to clarify how tall buildings will be assessed in line with Policy D9 of the London Plan.</p>
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			<p>The SPD sets out that the potential for a future Elizabeth Line station should be safeguarded in any proposal.</p> <p>Noted</p>
16	<p>Greater London Industrial Archaeology Society (Malcolm Tucker)</p>	<p>Kensal Canalside Opportunity Area Draft SPD consultation:</p> <p>The Greater London Industrial Archaeology Society has the following comments</p> <p>1) Heritage assets of the site. The site has several historical features that need to be respected and promoted to help provide a sense of place and continuity with the past. With the recent demolition of the two large gasholders, the site has lost a major piece of its identity, but there are other prominent features from the gas industry that provide reminders – the sites of two canal basins and their distinctive towpath bridges, the brick boundary wall along the towpath that demarcated the site, the water tower repurposed as a house and the gas company’s imposing Neo-Georgian office block. Just beyond the site boundary is the pioneering international-modern-style workers’ housing on Ladbroke Grove; that is a listed building and the other features add group value. Reuse of the large underground spaces in the more recent gasholder tanks might also be encouraged.</p> <p>An inventory of the various undesignated heritage assets needs to be prepared and their protection encouraged. Heritage interpretation should be encouraged as a matter of policy.</p>	<p>Noted. Text has been added to section 6.1 Heritage to encourage developers record and integrate heritage assets where possible.</p>

		<p>2) Importance of the canal basins. Built to receive coal delivered by barge from the Docks, these are the only such coal basins remaining on the London waterways and they feature scenic towpath bridges. The eastern basin of circa 1851 is still in water and used for sports training, while the larger basin of circa 1883 was infilled in recent years but should be reopened. While they are identified on the Opportunities map at paragraph 2.4, their heritage value also needs to be acknowledged. The bridges have steep approach ramps used by the canal horses, which are a very distinctive feature and now regionally rare. These may present a challenge to some wheelchair users, and alternative access should be provided for them.</p> <p>3) New canal crossing – opportunity to reuse historic Brunel Bridge. A remarkable cast-iron-girdered canal bridge, spanning the canal next to Paddington Station, was erected to the design of the engineer IK Brunel in 1838-9 but had to be demolished for a road improvement in 2004. It was carefully taken down and put into store pending the finding of a suitable site for its reerection. The Kensal Green Canal site offers a unique opportunity to achieve that, only three kilometres from its original site, close to the Great Western Railway that built it and adjoining Brunel’s burial place in Kensal Green Cemetery. The writer of these notes can provide RBKC with full details.</p>	<p>Noted. The spaces section of the Streets and Spaces chapter identifies the western wharf as a key space on the site for any future development which should be publicly accessible. CO1 also requires that new connections are accessible to all.</p> <p>Noted. The Council is aware of this bridge and would welcome further investigation with any application. The SPD does not preclude its reuse.</p>
17	Avril Mackintosh	<p>Living opposite Kensal Green Cemetery I am horrified to see the proposed bridge over the canal into the Cemetery giving access and the thought of the cycle route through this WORKING Cemetery is ridiculous and very disrespectful - when the developers have gone who is going to Police this ridiculous idea?</p>	<p>Any bridge and access to the cemetery would need to be agreed by the Cemetery Company as the SPD sets out.</p>

		I fully support everything said in The Kensal Triangle Residents Association SPD response - after all we live here right across from the development and should be listened to.	Noted and the Council welcome these comments.
18	Lynn Horsford	<p>I would like to object to the proposal to build a 20 story building on this site. The brochure doesn't accurately reflect what the finished site will look like, drawing only pictures of 4 story buildings. and only one picture of a high rise on p 76. In the light of the Grenfell tragedy local residents are rightly wary of tall structures, and of RBKCs ability to manage them. You do not make clear in the proposal whether the 20 story blocks are for affordable housing, social housing or market housing.</p> <p>The existing bridge on Ladbroke Grove is barely able to cope with current traffic, but there are no plans to widen it. The additional traffic on Barlby Road, which is always jammed at the junction with Ladbroke Grove, creates more fumes just by the school. Neither road is wide enough to carry the additional use this massive development will require. And the prospect of years of lorries getting to the site means misery for everyone on their route.</p> <p>You say: "The scale and density of the development required at Kensal Canalside will be a step change from the existing pattern of development in much of the Borough." But you do not adequately explain why this is the case.</p>	<p>The height map is indicative only and the accompanying text amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan.</p> <p>The Council is committed to ensuring the highest levels of fire safety for every resident in the borough. While we do not control land ownership of the site, any applicants will have to submit a fire statement demonstrating exemplar fire safety standards as set out in the London Plan, 2021.</p> <p>The exact location of affordable housing will be determined at application stage. The SPD has been amended to align with Local Plan Policy to ensure affordable housing is integrated into the site and not distinguishable from market housing.</p> <p>The SPD promotes a largely car free development. New text has been added to clarify that a local network traffic model created for the Council in</p>

			<p>conjunction with TFL has been created to assess any forthcoming applications.</p> <p>Kensal Canalside has been allocated to deliver a minimum of 3,500 homes in the Local Plan. The SPD sets out the Council's approach to ensuring the optimum delivery of high-quality affordable homes given the housing needs of the Borough. Given the site constraints and the historical nature of much of the borough a step change will be required to ensure the delivery of much needed homes.</p>
19	Susan Wilson	<p>It worries me. North Kensington is a very densely populated part of London with high numbers of residents with mental health problems.</p> <p>The last year has shown that the parks are packed with residents whenever the sun shines. Litter is a huge problem, and many now take out sound systems. It can be very unpleasant to go out for a walk. Forget peace and quiet and communing with nature, you wade through litter.</p> <p>Yet plans proliferate for tower block housing in Scrubs Lane, and now you propose many flats on this brown field site. Traffic on Scrubs Lane and Ladbroke Grove can be solid.</p> <p>And pollution at North Pole Roundabout breaches WHO levels regularly.</p>	<p>Noted. The importance of health and wellbeing in the development of the site is promoted by the SPD.</p> <p>Noted. The SPD promotes the importance of a green and blue network and the delivery of a variety of public open spaces, including green space.</p> <p>Kensal Canalside has been allocated to deliver a minimum of 3,500 homes in</p>

		<p>Create much more space,for play,re reation etc, but forget Boris and hisbuildbuildbuild. Lastly...Will the flats be carless?</p>	<p>the Local Plan. The SPD promotes a largely car free development. New text has been added to clarify that a local network traffic model created for the Council in conjunction with TFL has been created to assess any forthcoming applications.</p> <p>Reducing air pollution is an objective within the SPD at CH5 which seeks for an air quality positive development.</p> <p>Play and informal recreation standards are set out in the London plan.</p>
20	Phil O'Shea, Kensal Green Residents Association	<p>We thought the video was shallow and patronising. Why no detail?</p> <p>So there will be a bridge over the canal to the cemetery? Is that definite? Will there be a 24/7 path through the cemetery to the bridge?</p> <p>How high will the Tower Blocks be that overlook the cemetery?</p>	<p>Noted.</p> <p>The SPD supports the delivery of a bridge over the canal. Further details of any bridge or route through the cemetery will be required at application stage as set out in 3.1 Bridging the Canal.</p> <p>The height map is indicative only and the accompanying text has been amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan.</p>

21	Highways England	<p>Thank you for your email dated 12 April 2021 regarding the above consultation and requiring a response by 24 May 2021. Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. There is no SRN within the Royal Borough of Kensington and Chelsea, the nearest SRN is the M4 which is approximately five miles outside the borough boundary. Our interest in Local Plan documents is specifically focussed on the council's approach to highway and transport matters in relation to regeneration and new development. We are keen to understand how local authorities initially identify and prioritise transport improvements in order to deliver sustainable development. Specifically how local authorities set and implement policy to manage trip demand and ultimately how these might contribute to the safe and efficient operation of the Strategic Road Network for which we are responsible. We have reviewed the SPD documents and given the nature and distance from the nearest SRN, we are satisfied that the outcome of the consultation will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT Circular 02/2013, particularly paragraphs 9 & 10, and MHCLG NPPF2019, particularly paragraphs 108 and 109). We have no comments or objections.</p>	Noted
22	Natural England	<p>Thank you for your consultation request on the above dated and received by Natural England on 12th April 2021.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and</p>	<p>Noted.</p> <p>Direct reference in the text has been added to the Greening SPD</p>

	<p>managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.</p> <p>While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment, but may nonetheless have some effects. We therefore do not wish to provide specific comments, but advise you to consider the following issues:</p> <p>Green Infrastructure</p> <p>This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area.</p> <p>The National Planning Policy Framework states that local planning authorities should ‘take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure’. The Planning Practice Guidance on Green Infrastructure provides more detail on this.</p> <p>Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities.</p>	
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	<p>There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:</p> <ul style="list-style-type: none"> • green roof systems and roof gardens; • green walls to provide insulation or shading and cooling; • new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity). <p>You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.</p> <p>Further information on GI is include within The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity".</p> <p>Biodiversity enhancement</p> <p>This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.</p> <p>Landscape enhancement</p> <p>The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and</p>	
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	<p>townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might make a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.</p> <p>For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.</p> <p>Other design considerations</p> <p>The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 180).</p> <p>Strategic Environmental Assessment/Habitats Regulations Assessment</p> <p>A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p> <p>Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p>	
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23	Tim Schoeler	<p>After the incident in East London where a 19-storey block caught fire (Giant ACM-clad Ballymore block hit by blaze News Housing Today), how can we trust Ballymore (who are in charge of the tower block and hadn't acted on prompting from the government to remove the cladding) to build new towers in Project Flourish?</p> <p>Isn't it time to reduce the height of buildings so they can actually being reached by the Fire brigade? I couldn't find the maximum number of storeys proposed, only the comparison to the Trellig Tower (which may be listed but is not famous for its great integration into the neighbourhood and is an eyesore to say the least). Keep the residents safe and limited the height of buildings please!</p>	<p>The Council is committed to ensuring the highest levels of fire safety for every resident in the borough. While we do not control land ownership of the site, any applicants will have to submit a fire statement demonstrating exemplar fire safety standards as set out in the London Plan, 2021.</p> <p>The height map is indicative only and the accompanying text has been amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan.</p>
24	Stephen Barry	<p>I believe it is very important to maintain a supermarket of equal or greater size to the existing Sainsburys in the area. Whilst there are many mini and midi sized markets around, there are very few places that you can get a decent range of food like you can in a large supermarket.</p>	<p>The supermarket is allocated to be reprovided on the site. The SPD does not preclude the delivery of a supermarket of equal store size.</p>
25	Denise Neilson	<p>Read through the proposal document with growing anxiety, to find that was not unfounded - whilst it's a relief to find the superstore is retained in principle, there is no provision for parking. How on earth do our unworldly planners expect shoppers to get their heavy shopping bags home? Additionally the parking budget is set at 0, so if the superstore site has to include parking + goods delivery, the resulting store will be greatly reduced in capacity, and with many thousands of new customers, this will be a serious depletion to the needs of the community. On my frequent visits to Sainsburys, I would estimate that the footprint of the present store would not represent sufficient parking for both customers and suppliers and delivery. On a busy day the present car park is full and it is a</p>	<p>The SPD promotes a largely car free development with associated parking for the superstore being located below.</p> <p>Text has been added to clarify this. New text has also been added to clarify that a local network traffic model created for the Council in conjunction with TFL has been created to assess any forthcoming applications.</p>

		<p>lot larger than the footprint of the store itself. In addition, Sainsburys have the only petrol station in the area, and that would not be located underground!</p>	<p>The SPD does not preclude the delivery of a supermarket of equal store size. The level of supermarket car parking should reflect the need for the development to demonstrate how it supports a reduction in car mode share and car dominance in line with the London Plan.</p> <p>The SPD and Local Plan allocation does not plan for the reprovision of a petrol station in the redevelopment of the site.</p>
26	OPDC	<p>Thank you for consulting Old Oak and Park Royal Development Corporation (OPDC) on the Draft Kensal Canalside Supplementary Planning Document (SPD). OPDC commends the quality of the SPD and the proactive development process undertaken by Royal Borough of Kensington and Chelsea (RBKC) officers in its production. OPDC and RBKC officers have worked positively in the development of OPDC's Local Plan and the Draft Kensal Canalside SPD that has resulted in both documents providing coordinated and consistent guidance for the following elements:</p> <ol style="list-style-type: none"> 1. Delivering well-connected Good Growth for both the Kensal Canalside Opportunity Area and the place of Scrubs Lane. 2. Development capacity, phasing, land uses and indicative building heights on the North Pole Depot development site that comprises 	Noted.

	<p>locations within the OPDC and RBKC areas.</p> <p>3. Transport infrastructure comprising:</p> <ul style="list-style-type: none"> a. The proposed east to west route (known as Wormwood Scrubs Street within the OPDC Local Plan and South Street in the SPD) connecting Ladbrooke Grove within RBKC to Scrubs Lane within OPDC during the OPDC Local Plan period (ending 2038) and to Old Oak Common Station and Old Oak Common Lane beyond the OPDC Local Plan period. b. Proposed bus route and walking and cycling routes along Wormwood Scrubs Street / South Street. c. Water based transport along the Grand Union Canal connecting Kensal Canalside to the OPDC area. d. Improvements to the Grand Union Canal towpath. e. Increased access to Little Wormwood Scrubs. <p>4. Location of viewing points to inform the design of development.</p> <p>OPDC looks forward to the continued joint working with yourselves in finalising both the OPDC Local Plan and the Kensal Canalside SPD to help facilitate the coordinated delivery of high-quality new neighbourhoods and connections.</p>	
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27	Brent	<p>1.0 Introduction Brent Council supports the overarching objective for Kensal Canalside Opportunity Area (KCOA) to deliver a minimum of 3,500 high-quality homes, with an emphasis on affordable housing; 2000 jobs; and supporting infrastructure. The principles of creating a connected, active, liveable, high quality, sustainable and healthy place are also strongly supported.</p> <p>2.0 Introduction to the site For completeness, we would seek inclusion on the constraints map of Kensal Green Conservation Area and the Grade II listed 842 Harrow Road, which are in Brent. We would also highlight the proposed extension to the Kensal Green Conservation Area. Further information is available in the Brent Historic Environment Place-making Strategy.</p> <p>3.0 Connections Further clarification is required in the SPD on the various transport impacts that the proposed development would have, as highlighted in the strategic transport assessment. In particular further details of the:</p> <ul style="list-style-type: none"> - extent of the vehicle delays on some of the surrounding roads and junctions (especially the Harrow Road/Ladbroke Grove junction) and what might be required in the way of mitigation and the timing/phasing of these. - extent of increase in bus passenger numbers on the local bus network and what is likely to be required in terms of additional capacity (either new services or more frequent existing services) and the timing/phasing of these. - likely parking provision and delivery and servicing arrangements for the site which are only briefly mentioned in the SPD. This should include consideration of potential parking displacement to other areas and how 	<p>Noted.</p> <p>The map makes it clear that the conservation areas listed in this map are within RBKC only. The baseline provides additional detail on wider conservation areas and listed buildings.</p> <p>The Strategic Transport Modelling undertaken by Steer and audited by Transport for London did not indicate that there would be a significant traffic impact on the Harrow Road/ Ladbroke Grove junction. The Council has developed a Network (VISSIM) Traffic Model of the local road network including the junction of Ladbroke Road and Harrow Road. The developers at Kensal Canalside will use this to test their development proposals. Any</p>
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	<p>this will be reduced.</p> <p>We are supportive of a new pedestrian/cycle crossing over the canal linking the site with Kensal Green Cemetery, which would provide a more direct link to people wishing to access key destinations such as Kensal Green Station. Consideration should also be given to securing improvements to key paths/links in the park to make this a more pleasant walking/cycling environment.</p> <p>We are also supportive of a new pedestrian/cycle bridge over the railway linking the north/south sites, but would like to understand whether it would be desirable/feasible to have a bridge that could accommodate buses as well to provide more direct public transport access into the site.</p> <p>We are supportive of improvements to the vehicular entrance to Ladbroke Grove to provide clearly defined attractive and safe, pedestrian and cycle entrances. There is a need to improve the pedestrian experience at this junction.</p> <p>Kensal Green is the closest underground and overground station to the development. Consistent with the ambition to create a development that is accessible to all, we would welcome inclusion in the SPD to the aspiration for step-free access at Kensal Green station and a commitment to working with TfL and Brent Council to secure this.</p> <p>5.0 Live, Work and Visit Live</p> <p>We strongly support the emphasis on securing affordable housing, with the target of 35% on private land and 50% on public and/or former utilities land and a tenure split of 70% social and 30% intermediate. The</p>	<p>significant impacts identified during the course of this exercise will be mitigated through the development management process.</p> <p>The Strategic Transport Modelling Report identified that there would a significant increase in Bus Passenger Demand on Ladbroke Grove with lesser increases on other corridors. The SPD states that new development must seek to deliver “improved access to public transport including an enhanced and expanded bus network”. Additional text has been added to the reasoned justification to explicitly state additional capacity will be expected on routes serving Ladbroke Grove. The timing and phasing of capacity enhancement will be worked out during the Development Management Process.</p> <p>Sufficient loading facilities would be provided to meet the operational needs of the development. Occupants of the development will not be permitted to park in those Controlled Parking Zones close to the site including those in L.B Brent. Most of the new homes shall not have access to</p>
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	<p>target of 30% 3 and 4 bed+ is also supported, reflecting the need for family housing in the wider Housing Market Area.</p> <p>It is noted, the GLA's child yield calculator has been used to establish the projected education needs of Kensal Canalside over the DIFS period (2035), and that the study suggests there is capacity for the additional children within the existing surrounding schools, when accounting for future extensions. Taking into account the inflow and outflow of students between Brent and RBKC, we will need to continue to engage on school place planning, particularly as the impacts of COVID on more long-term demographic trends become clearer. The SPD should include a commitment to on-going joint working with Brent in ensuring education needs are met.</p> <p>Similarly, we would seek a commitment to including Brent in engagement with the NHS to ensure adequate healthcare provision.</p> <p>Work</p> <p>The requirement for the development to seek to deliver a minimum 10,000 sq.m of new office/workspace to support the existing local cultural and creative industries cluster is strongly supported. The ambition is consistent with the Brent Workspace Strategy, which identifies the potential for the Digital and Creative sector in Kensal Green, with a need for a range of workspace including small, flexible workspace, studios and makerspace, office and co-working space. Affordability is an issue particularly in the south of Brent, including Kensal Green and Queen's Park.</p> <p>We note the supporting evidence includes a draft Creative and Civil Sectors Workspace Strategy, which is to be taken forward as an SPD. The</p>	<p>car parking. We do not anticipate proposals would have a significant impact on parking demand in surrounding areas.</p> <p>Noted. The local plan identifies new and improved routes as essential mitigation.</p> <p>The Council has investigated the feasibility of delivering a road bridge over the Great Western Mainline Railway that could accommodate buses. Whilst one could be built, the requisite ramp on the south side would greatly compromise the development potential of the North Pole Depot both in terms of capacity and quality.</p> <p>Noted. The SPD aligns with this.</p> <p>The SPD has been amended to clarify that it is expected that developer contributions will be necessary to the underground network to ensure that capacity is managed</p>
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	<p>leasing and management arrangements section of this document appears to be incomplete in the draft. This section is needed to understand how the space secured will be affordable and meet the needs of existing local cultural and creative industries. We would welcome engagement on this SPD as it is taken forward.</p> <p>Visit Levels of development proposed will give rise to the need for a neighbourhood centre, however, reference should be included to the need for the centre to complement and not detrimentally impact the vitality and viability of the existing town centre hierarchy, including Kensal Green Town Centre to the north.</p> <p>6.0 Character</p> <p>Whilst RBKC Local Plan policy CA1 identifies Kensal Canalside Opportunity Area for high-density development, it is not identified as a tall building zone. However, we appreciate the adoption of the Local Plan pre-dates current London Plan requirements in relation to identifying suitable locations for tall buildings in Development Plans. Given that the appropriateness for tall buildings has not been tested through the Examination of a Development Plan, individual schemes will need to be robustly tested on their merits. It is considered the criteria in the SPD, including cumulative physical and environmental impacts, alongside London Plan policy is sufficiently robust. We are also supportive of the requirement for isolated points of height.</p> <p>The area identified 'where tall buildings might be acceptable' adjacent Kensal Green Cemetery is of most concern due to its proximity to the cemetery. Given that the SPD does not support the clustering of tall</p>	<p>Noted.</p> <p>Noted. The Council will continue to work with L.B Brent and surrounding local boroughs to ensure appropriate need is met and is included in the list of key stakeholders within the document.</p> <p>As above.</p> <p>Noted.</p>
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	<p>buildings we would want to see this rectangular area reduced in size to a more focussed area and set further back from the cemetery.</p> <p>Furthermore, views into Kensal Green Conservation Area need to be addressed properly within the supporting document – Appendix 1 KCOA Views Study. Although the conservation area boundary with view 20 is shown accurately in the general views location map, the Study is not accurate and misleading in relation to view 20 on pages 50 and 51. The junction described at Pember Road is not within the Kensal Green Conservation Area. We would seek the study is amended to include two arrows for view 20 equally spaced to take into account views to the conservation area, and suggest the following amendments to the study:</p> <p>View 20. Kensal Green Conservation Area (Brent). Photo: should be of the Kensal Green Conservation Area.</p> <p>The view point. Houses facing Harrow Road Description. The Kensal Green Conservation Area covers a number of adjacent properties located along the northern side of the Harrow Road opposite to Kensal Green Cemetery. The trees of Kensal Green Cemetery terminate the vista.</p> <p>Heritage significance: High The view is located within the Kensal Green Conservation Area (London Borough of Brent) and elements of the Grade I listed Kensal Green Cemetery are visible.</p> <p>Townscape value: High The townscape in the Kensal Green Conservation Area is very consistent. This is very unlikely to change as a result of new development in the KCOA. However, the way termination of the vista will change. The green</p>	<p>Noted. Text has been added to this section to clarify opportunities for leasing/ management opportunities that could be taken forward.</p> <p>Noted. The SPD is clear that the development should deliver a neighbourhood centre as per the Local Plan. Further clarification is not considered necessary.</p> <p>Noted. The height map is indicative only and the accompanying text has been amended to clarify that tall</p>
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			<p>the conservation area, given its location would not allow for the conservation area to be shown in context. Additional text has been added to the SPD to confirm that additional views can be agreed at application stage.</p> <p>Noted.</p> <p>Agreed. Text has been amended to clarify this.</p>
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28	Historic England	<p>Re: Kensal Canalside Supplementary Planning Document (SPD) and Strategic Environmental Assessment (SEA) (April 2021)</p> <p>Thank you for the opportunity to provide comments on the Kensal Canalside SPD. While we do not appear to have been directly consulted on the associated SEA we have taken the opportunity to provide comments on that as well. As the Government's adviser on the historic environment, and a statutory consultee in the context of SEA, Historic England is keen to ensure that the conservation and enhancement of the historic environment is fully taken into account at all stages and levels of the Local Plan process. Accordingly, we have reviewed these documents in the context of the National Planning Policy Framework (NPPF) and its core principle that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.</p> <p>Summary</p> <p>Historic England considers that the approach to development promoted by the draft SPO does not adequately respond to vulnerable heritage of the greatest significance (most notably Kensal Green Cemetery). In our view the SPD does not represent a positive strategy for the historic environment. It encourages harmful development which is not consistent with higher level policy. It also fails to meet a once in a century opportunity to protect and enhance the Royal Borough's largest and most complex Heritage At Risk site.</p> <p>We are also concerned that the SEA is not coherent in its assessment of the impacts on cultural heritage. The SPD and SEA appear to defer critical</p>	<p>The draft SEA was consulted on at the same time as the draft KCOA SPD and Historic England comments have been taken into consideration in the preparation of the SEA final report.</p> <p>Noted. Text has been added to clarify the Council's position with regards to heritage and how this will be assessed at planning application stage. Specific mention is given to the cemetery.</p>
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	<p>assessments of impacts and consideration of mitigation to the planning application stage. In our view this does not represent an appropriate planned approach in accordance with national and regional policy.</p> <p>We consider that extensive additional work is required before this SPD can be adopted. General advice The Opportunity Area borders one of London's most important historic landscapes, Kensal Green (All Souls) Cemetery (https://historicengland.org.uk/listing/the-list/list-entry/1000817).</p> <p>The first of the Magnificent Seven Cemeteries in London, it is of unparalleled historic, architectural and landscape interest, which is recognised by its extensive designations, many at the highest grades. It also contains the highest density of 'At Risk' heritage assets in London. In major part due to the poor state of the cemetery, in 2020, Kensington and Chelsea had the joint-most entries on the London and South East Heritage At Risk Register. For these reasons Historic England has been involved with the cemetery for several decades supporting its preservation. Given the uniquely important amenity and place making value the cemetery will have for the Opportunity Area, we expect development in the Kensal Canalside area to actively contribute to securing its sustainable future.</p> <p>Following a summary of key elements of the policy context that we consider this SPD should have aligned with this letter sets out our overarching concerns for the SPD and the SEA. More detailed comments are then contained in an appendix.</p> <p>Broader policy context National policy seeks sustainable development, meaning that the planning system's three overarching objectives (economic, social and</p>	<p>The SEA has been updated and concerns dealt with in the associated subsequent SEA report.</p> <p>Noted.</p> <p>Further detail has been added and clarification of the cemetery's status and its 'at risk' assets have been highlighted in the text within the SPD.</p> <p>Amendments to text have been made to include the requirement of a Statement of Heritage Significance and a Heritage Impact Assessment.</p> <p>Additional text has been added that emphasises the need to ensure any mitigation of harm ensures the long-term public benefit.</p>
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		<p>environmental) are interdependent and need to be pursued in mutually supportive ways. This is in order that opportunities can be taken to secure net gains across each of the different objectives (NPPF para 8).</p> <p>For the historic environment the NPPF seeks that local planning authorities set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats (para 185). The NPPF specifically encourages local planning authorities to look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance (para 200) and states that SPDs should be used to provide maximum clarity about design expectations at an early stage (para 126).</p> <p>The London Plan (2021) seeks development strategies to demonstrate a clear understanding of the historic environment, the heritage values of sites or areas and their relationship with their surroundings (HCI). Parts Band E of the policy are particularly relevant to this SPD.</p> <p>These state that understanding of heritage significance should be used to inform the effective integration of London's heritage in regenerative change by, among other things, (B2) "utilising the heritage significance of a site or area in the planning and design process" and (B4) "delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing." Part E relates directly to heritage assets At Risk, stating "boroughs should identify specific opportunities for them to contribute to regeneration and placemaking, and they should set out strategies for their repair and</p>	
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	<p>reuse."</p> <p>This positive approach to heritage is also evident in the strategic policy for Opportunity Areas (SDI part 84), and policy D3 (DII) Optimising Site Capacity through the Design-led Approach.</p> <p>Policy D9(b) (Tall Buildings) requires that proposed "locations and appropriate tall building heights should be identified on maps in Development Plans". D9 goes on to emphasise the need for a design-led approach and states that "d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area."</p> <p>As the SPD sets out locations and heights for tall buildings across the OA, not just those of equivalent height to Trellick Tower (a 'metropolitan landmark' according to the Council's existing Building Height SPD), and since the SEA identifies that this will cause harm to heritage, we would have anticipated there being some evidence to demonstrate that alternative massings had been explored and that the approach will contribute positively to the character of the area. We do not consider that the approach taken in the SPD accords with the London Plan, which is the most up-to-date part of the local development plan.</p> <p>The Local Plan (2019) has a detailed site allocation for the Opportunity Area (CVS and CAI). While this refers to high density development it does not refer to tall buildings or give an indication of building heights.</p>	<p>Noted.</p> <p>The height map is indicative only and the accompanying text has been amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan.</p>
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		<p>The allocation does include the need for development to respond to heritage assets including Kensal Green Cemetery, and the S106 requirements includes public realm and improvements to the cemetery, subject to access.</p> <p>The allocation is in line with other parts of the Local Plan which include clear policies to protect heritage (CL3 and CL4) and ensure that new design respects its context (CII and CL2).</p> <p>Policy CL12(B) on Tall buildings requires that "development has a wholly positive impact on the character and quality of the townscape" and that proposals that do not will be resisted "other than in exceptionally rare circumstances." Supporting paragraphs (22.3.94-107) clearly set out the issues and opportunities for tall buildings within the Royal Borough. Finally, the Local Plan includes details relating to the aspiration for a footpath across the cemetery in the infrastructure schedule (p. 263) which it describes as 'essential mitigation'.</p> <p>SPD While the overall vision for the Opportunity Area in the SPD includes a welcome reference to heritage (p.12), we have four major areas of concern with the draft SPD. These are:</p> <ul style="list-style-type: none"> i) The SPD introduces a new and weaker heritage policy test in CH2. It states that "Development that responds to and does not cause unacceptable harm to the significance of the heritage assets". This actively allows harm to heritage and is not in alignment with the development plan. We object to this wording. 	<p>Noted.</p> <p>Noted. The DIFS also includes this in infrastructure requirements.</p> <p>Noted, as above</p>
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		<p>ii) Direct impacts on heritage assets: there is a striking lack of detail provided on the bridge over the canal and the access route through the cemetery, described as 'essential mitigation' in the local plan. It is unclear what the impacts of this infrastructure will be on the cemetery and how these will be addressed to avoid harm. The supporting evidence does not provide any useful clarifications.</p> <p>iii) Impact on the setting of heritage assets: the SPD seeks to introduce policy support for tall buildings that goes beyond what might be reasonably be inferred in the current Local Plan. The London Plan requires tall building development to be genuinely plan-led, and as such the approach within the SPD appears premature, and we consider that if the Council want to take this approach to height, it should be brought forward as part of a statutory development plan document.</p> <p>Furthermore, there is a lack of detail and evidence to justify the approach to the massing of the site. The proposed general massing approach is ambiguous, and the approach to 'landmark' tall buildings (of a 'metropolitan landmark' scale) in multiple locations across the Opportunity Area appears to pay little or no regard to environmental impacts. With development of this scale and in an area with such sensitive heritage assets we would expect evidence of 3D modelling underpinning the approach set out in the SPD to be presented as part of the consideration of design options in line with the design led approach required by the London Plan (policies D3 and D9). There is no evidence that this work has been done and the limited work on views is not sufficient in our opinion</p>	<p>CH2 has been amended to ensure it aligns with the tests set out in the NPPF.</p> <p>Amendments to text have been made to include the direct impacts on the cemetery of a route through and to include the requirement of a Statement of Heritage Significance and a Heritage Impact Assessment to include any necessary mitigation of harm.</p> <p>As above.</p> <p>The height map is indicative only and the accompanying text has been amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan.</p>
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		<p>given the scale of development and the sensitivity of the heritage assets affected.</p> <p>iv) The prominent omission of reference to the sensitivity of the cemetery (due to its exceptional significance and poor condition) and the need for an extensive amount of mitigation works - to ensure that its heritage significance is secured and that it is a safe and pleasant place to visit or pass through. The significance of the cemetery is referenced in the Local Plan (policy CA1), which, rightly, also seeks to reduce the number of buildings and monuments at risk (22.4.3). However, the SPD does not provide clarity on this important issue.</p> <p>The SEA seeks to assess the impacts of the proposal on the historic environment. It is unable to do this successfully for a number of reasons. The most important of these are:</p> <p>i) The baseline (appendix C) appears cursory and does not appear to adequately take account of the significance and sensitivity. There is no reference to the Cemetery's 'At Risk' status for example, despite this being a key national and regional policy consideration. We note that the Local Plan includes a more precise information in relation to the significance of Kensal Green Cemetery. We are unclear how the layout for the Opportunity Area in figure 4.1 relates to the SPD, and what it represents in three dimensions.</p> <p>ii) As the SEA notes at 5.58, the "SPD states that development must not cause unacceptable harm to the significant of the heritage assets, however the definition of unacceptable harm is not defined therefore uncertainty is also attached." We agree, and object to this approach which appears to encourage harm to heritage.</p> <p>Further to highlighting the uncertainty that the SPD introduces,</p>	<p>High level capacity modelling was undertaken as detailed in the capacity scenarios. However, the amended text within the SPD makes it clear that any applications will be determined in line with Policy D9 of the London Plan and the environmental and physical impacts such as wind/ microclimate and daylight/sunlight must be assessed cumulatively.</p> <p>New text has been added that specifically references the significance of the cemetery and the extensive number of 'at risk' monuments.</p> <p>Text has been included that ensures access routes through the cemetery,</p>
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		<p>the SEA concludes at 5.48 and 5.50 that there will be adverse impacts on heritage. We do not agree that any development in the Opportunity Area will cause harm as the SEA suggests. However, it is clear that the impact and potential degree of harm is variable and dependant on the development that comes forward. It would have been possible for the SEA to make more confident judgements if evidence of the scale and massing of the scenario presented in the SPD was available and tested in relation to heritage significance; that the proposed massing was designed to respond to heritage significance; and if adequate details of the proposed works affecting the fabric of the heritage assets been provided. Furthermore, it would have been possible to consider possible mitigation measures - for example greater advice on design, an indication that works will require screening etc. - which would have improved the SPD.</p> <p>iii) Elements of the SEA appear to be dependent on the "Re-design the Kensal Green Cemetery and Grand Union Canal to be utilised as recreational assets." (p.10). This illustrates the interconnectedness of heritage issues with health and wellbeing, as well as natural environment questions (planting being an elements of the designated landscape's significance). It also suggests that some of the SEA objectives may not be deliverable as they require a degree of change to heritage assets that is not realistic or deliverable.</p> <p>Conclusion We strongly encourage you to revise this document in line with our comments. Failure to do so is highly likely to result in unsustainable development and the prospect that many of the</p>	<p>including any measures to facilitate safe access, should respond to the special historic interest of the registered cemetery landscape.</p> <p>As above, the significant number of 'at risk' monuments is clarified in additional text in the SPD.</p> <p>The indicative plan at 4.1 indicated the high level layout of the Opportunity Area as seen in the capacity scenarios document.</p> <p>The SEA has been updated in relation to the changes to the SPD and notes that: 'Minor positive effects are also expected in relation to SEA objective 10: Historic Environment as developing the site to be sympathetic to the local character is likely to preserve the heritage assets and historic setting.</p>
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		<p>SPD, and the Local Plan, objectives will not be met. We would welcome discussing this with you further at the earliest opportunity.</p> <p>Please note that these comments do not relate to archaeology, advice on which is provided by the Greater London Archaeological Advisory Service. However, we note that GLAAS have previously advised that the SEA should identify the gasworks as an undesignated heritage asset associated with the listed gasholders. Assessment of the gasworks' significance and potential mitigation should be informed by Historic England guidance on this topic:</p> <p>"Guidelines for evaluating and recording England's former gasworks and redundant gasholders" https://historicengland.org.uk/content/docs/guidance/gas-works-recording-guidelines/. We are disappointed by the 'Action taken/ RBKC Officer Response' to this advice, which does not appear helpful. We strongly encourage you to follow GLAAS's advice.</p> <p>Finally I must note that this opinion is based on the information provided by you and for the avoidance of doubt does not take precedence over our obligation to advise you on, and potentially object to development proposals which may subsequently arise from this SPD or in this conservation area and which may have adverse effects on the historic environment.</p> <p>Appendix</p> <p>SPD The SPD falls short of being a robust document to guide good sustainable</p>	<p>However, this is uncertain at this stage.'</p> <p>The SEA final report states that, 'Inevitably some impacts will need to be considered at the planning application stage when detailed proposals for development at the site will come forward. Appendix C has now been updated to provide reference to the Kensal Green Cemetery's 'at risk' status.'</p> <p>'Noted. Reference to how the development can promote the sustainability of the historic environment and updates to the cumulative effects section are now included. The monitoring indicators have now been updated.'</p> <p>Noted.</p>
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	<p>development.</p> <p>Further points include: The proposed bridge over the canal. Key aspects of the impact of this crossing do not appear to have been considered, including construction/design and landing of bridge, as well as impact on the setting and fabric of the cemetery. The details in the appendix of the DIFS document suggests that some work has been done here but this is not provided, and it is unclear what impact this undisclosed scenario would have on the heritage significance cemetery or the canal.</p> <p>The access route through the cemetery. Key aspects, setting out how this will need to be managed sensitively are not considered. There is no minimum list of physical works to the fabric of cemetery that would be necessary to provide a route through, ensure public health and safety, long term management, mitigation of any wear and tear arising from additional use and impact on setting and fabric of heritage assets. The details in the appendix of the DIFS document suggest that some work has been done here, but this evidence is not provided. It is unclear if the costs (seemingly slightly higher than the firm included in the Local Plan) are reasonable in light of the necessary works to the cemetery.</p> <p>The broad reference in the DIFS appendix to widening footpaths and providing lighting may not be appropriate within the Grade I registered landscape. This needs detailed consideration with key stakeholders including Historic England, and there should be a clear indication of the preferred approach in the SPD to ensure that this is deliverable.</p>	<p>Noted. The gas holders have been removed from the site.</p>
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	<p>The proposed massing is ambiguous except for 4 areas identified for tall buildings. The SPD contains no evidence that design led approach has been taken in line with the London Plan (GG2, 01, D3, 09 and HCI) or that the proposed massing has been informed by modelling or an understanding of the significance of the cemetery.</p> <p>While tall buildings may be appropriate on this site, the supporting evidence and the SPD does not lead us to that conclusion or that the locations identified are appropriate. The design code which supports the SPD makes no reference to heritage and only limited reference to context, which is one of the critical themes in the National Design Guide. We are concerned that the design approach set out is insufficiently detailed, that insufficient attention is given to context in order to meet the requirements of the development plan, and that too much is being left until the planning application stage.</p> <p>The SPD focuses on views when looking at the impact of the proposed new development on the historic environment. We are not convinced that these views have been selected based on the significance of the affected heritage assets featured in the views (notably for views from the surrounding townscape). Likewise, there is no evident link between the views and the proposed massing. As a number of tall buildings are proposed, the development has the potential to have a large impact over a wide area. We recommend that view modelling and shedding diagrams be used to identify potential impacts further afield than the given viewing positions.</p> <p>The views presented in the appendices to the SPD are confusingly labelled (the plan labels do not correspond with the view labels) and, in our view, give little guidance in terms of the potential visibility or impact of any new</p>	<p>Noted. Amendments to text have clarified the Council's position to ensure the sustainable development of the KCOA site.</p> <p>New text has been added to the section 'Accessing and bridging the canal' to clarify how any proposal for a bridge and route should respond to the special historic interest of and setting of the registered cemetery landscape.</p> <p>Further detail will be required at application stage of any potential route through the canal.</p>
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	<p>development. We recommend that the views look towards the development site and that additional views are considered, such as those originating from outside the Grade 11 * Dissenter's Chapel.</p> <p>Furthermore, we would expect a clear steer on expectations for presentation of views in support of development proposals, i.e. camera lens to be used, resolutions, night time, winter-time and summertime comparisons, as well as guidance on wire line verses renderings. We encourage the Council to follow best practice guidance, as set out in the Landscape Institute Technical Guidance Note 06/19 Visual Representation of Development Proposals.</p> <p>We note that the SPD views do not take adequate account of the condition of the existing vegetation within the cemetery and the importance that this vegetation makes to the setting of the cemetery and its role in filtering and partly screening views to areas outside of the cemetery. We also note that many of the existing trees within the cemetery are nearing their end of life and cannot be relied upon for their presence in views or as screening tools. The SPD should include the potential for S106 contributions to be secured to ensure that any tree screening that is relied upon to mitigate the impact of development is retained in a good condition and that successional planting is secured where necessary (subject to agreement with the cemetery).</p> <p>National and strategic policy requires that there is a positive strategy for heritage assets at risk. This site plays an integral role in the setting and fabric of Kensal Green Cemetery and conversely has the potential to play a significant role in the outlook and amenity of the development. More needs to be done within the SPD to take into account impacts on the</p>	<p>The SPD has been amended to clearly set out how development should positively approach heritage assets in the vicinity of the site.</p> <p>The height map is indicative only and the accompanying text has been amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan.</p>
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	<p>cemetery beyond the creation of physical routes through.</p> <p>This is a once in a century opportunity to resolve the HAR problems at the cemetery. The SPD fails to address this opportunity or to appropriately take into account the impact of the proposals on the significance or setting of the cemetery or the contribution that the cemetery could make to local amenity.</p> <p>HE has invested significant amounts of public money into the cemetery (around £1 million in little more than a decade), notably on monuments and the boundary wall.</p> <p>Despite this major public investment there remains a vast conservation deficit, with many listed monuments still At Risk, and many hundreds - if not thousands – of unlisted monuments, which contribute to the significance of the RPG and conservation area, also in need of repair, restoration and/or making safe. It is unclear what the figures in the DIFS are based on, and they may potentially significantly underestimate the costs involved in making one of- if not the - key amenity feature for the new development safe and welcoming.</p> <p>We encourage the Council to work closely with the General Cemetery Company and ourselves to ensure that the condition of monuments that contribute to the cemetery's significance is understood, and that the development of the Opportunity Area includes a realistic and effective strategy to help secure that heritage significance for the long term.</p> <p>In addition to the points above we consider that:1. The SEA does not adequately engage with the potential impacts on the historic environment. This is evident in the scores for the preferred option and reasonable alternatives (table 4.1) where all three scenarios have an</p>	<p>Noted, as above.</p> <p>The SPD has been amended to clarify that additional views can be agreed with the Council at planning application stage.</p> <p>Additional changes were made to highlight relevant guidance for any presentation of views.</p>
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	<p>unknown and potentially harmful impact on heritage. This illustrates that the approach taken in the SPD is not a design led approach, as required by higher level policy. We consider that the three options are likely to have different impacts on the historic environment, and suggest that the options would have been more helpful if they had looked in greater detail at how the development was arranged across the site rather than increasing the quantum of overall development that has been established in policy.</p> <p>2. Concerning the assessment of the Vision (pp 30-1) while we note that the SPD does seek to at the highest level to "Respond to the historic setting of the Kensal Green Cemetery and dockside development", we disagree with the conclusion that the approach set out in SPD would have a significant positive effect on heritage. While it may be possible for development in this Opportunity Area to positively enhance the historic environment, the approach set out across the SPD makes this less likely rather than more likely as aspired to in the Vision.</p> <p>3. The SEA does not adequately consider the impact of development promoted by the SPD on the sustainability of cultural heritage (p.21). This development can and should (in our view) greatly enhance the long-term sustainability of the cemetery in terms of its viability and the quality of the environment. The development will bring thousands of new people to the area, increasing visitors to the cemetery- potentially by huge numbers if there is to be a route through it. Given the poor condition of the cemetery and the risks this poses to safety as well as heritage significance and amenity, ensuring improved viability of the cemetery will be key to the sustainability of the whole development.</p> <p>Despite this potential for enhancement, and the risk of harm if the works</p>	<p>The views document notes the varying landscape changes throughout the year and some note is made of landscape. The SPD has been updated to include the potential for long term landscape mitigation as agreed where necessary as part of any Heritage Impact Assessment.</p> <p>CH2 has been positively reworded to align with the NPPF</p> <p>Amendments as detailed above.</p>
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	<p>are carried out without adequate mitigation or an appropriate design response, which the SPD should help ensure, the SEA leaves this for the planning application stage. It notes that if the SPD were not adopted then "more than adequate protection would still be afforded to the heritage and archaeological assets of the KCOA through policies within the Local Plan (2019)". We consider that the SPD as drafted represents a diminution of the protection for cultural heritage compared to the Local Plan. We encourage the Council to respond to the weaknesses we have identified with the SPD to ensure that it can realise the opportunities for enhancement and prevent avoidable harmful impacts.</p> <p>4. At pp.32-3 we note that the SEA suggests any works will cause harm to cultural heritage, and that the impact of the cycle/footpath are unclear. As stated above we do not agree that development will automatically be harmful. However, we note that there is significant potential for it to be, especially if details like the route through are handled insensitively. Likewise, the potential for harm is increased if tall buildings are brought forward in locations close to cemetery, and these have eye-catching 'landmark' buildings which will distract from and may visually dominate the cemetery and the heritage assets within it. At present the SPD seeks to encourage both tall buildings in potentially harmful locations, and that they serve a landmark function which increases the likelihood that they have incongruous designs. The uncertainty in the SEA illustrates the shortcomings of the information underpinning the SPD and how, in its current form, it is likely to encourage unsustainable development that will not meet the requirements of the development plan.</p> <p>5. We do not consider that cumulative impacts are adequately assessed. These only consider development within the Royal Borough. We consider that the SEA should take account of the substantial development planned</p>	<p>Noted.</p> <p>The density of heritage monuments at risk is reflected in amendments to the SPD.</p> <p>Noted.</p> <p>Noted</p> <p>The SEA final report reflects the amendments made to the SPD to ensure that it aligns with Development Plan policies.</p>
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			<p>Noted. SEA Final report updated in line with the SPD changes.</p> <p>Noted. SEA Final report updated in line with the SPD changes.</p>
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			<p>Noted. SEA Final report updated, and reference made to OPDC development.</p> <p>Noted. Reference to how the development can promote the sustainability of the historic environment and updates to the cumulative effects section are now included. The monitoring indicators have been updated.</p> <p>This report does not form part of the background documents used in the creation of the SPD. Comment is solely made in reference to scheduled monuments.</p>
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29	Friends of the Scrubs	<p>Introduction</p> <p>1. The Friends of the Scrubs are an association of users of Wormwood Scrubs open space (“the Scrubs”). We are a registered charity (no. 1187120) and our website is at https://www.friendsofthescrubs.uk . Scrubs users comprise walkers, dog walkers, games players, botanists, bird watchers and other nature lovers, model aircraft flyers and others. Despite different interests we are united in our desire to keep the Scrubs “more wild than tamed”. The objects of our constitution include the conservation, protection and improvement of the Scrubs. We have responded to all OPDC and LBHF planning and other consultations affecting the Scrubs.</p> <p>2. Although the SDP may not appear to impact the Scrubs directly, we are concerned by the potentially adverse effects of tall buildings on views from the Scrubs and by the pressure on neighbouring open space which includes the Scrubs.</p> <p>Views</p> <p>3. Appendix 1 to the SPD is the Kensal Canalside Opportunity Area (“KCOA”) Views Study. It contains a list of views with a table at 1.2 of “Heritage Significance & Townscape Value”. View 15 Wormwood Scrubs is the view from the Scrubs looking north east (attached). This is a pleasing view with Trellick Tower in the distance. It typifies the openness of the Scrubs, an openness which has recognition in the Scrubs’ designation as Metropolitan Open Land. In the table at 1.2 its Heritage Significance is characterised as “High” and its Townscape Value as “Medium”. In the Views Study of 2017 the OPDC (the local planning authority for the Scrubs), Views 13 and 14, to the right and left of the gasholder respectively, are said to be part of the “Wormwood Scrubs Character Area” and are characterised as “potential heritage views”.</p>	<p>Noted.</p> <p>Noted</p>
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	<p>4. When reading the supporting text to View 15 of Appendix 1 under “Heritage significance: High” it becomes clear that what is being considered is Trellick Tower as a heritage asset and the effect taller buildings on the KCOA will have on the Tower as a landmark. The text continues “the heights and distribution of new development must be carefully managed to respect the setting of Trellick Tower”. Any adverse effect such buildings will have on the general view is considered under “Townscape value; Medium” where it is described as “open and panoramic”. Later the text includes “Any buildings above the treeline should be recessive and built to a variety of heights to provide a varied skyline minimising bulk”.</p> <p>5. We find it disconcerting that greater value is placed on respecting the setting of Trellick Tower as a landmark (Heritage Significance High) than on preserving the openness of the Scrubs (Townscape Value Medium). We contend that insufficient weight has been given to the panoramic nature of the view and to the Scrubs’ status as MOL and hence that its Townscape Value should equally be designated “High”. We submit that the the maximum permitted protection of this view is amply justified and that building above the treeline should not be encouraged.</p> <p>6. Views some distance to the left of the gasholder are the subject of planning consents already granted in the case of Mitre Yard and North Kensington Gate (South) and include provision for tall buildings which in our view amount to a blot on the landscape.</p> <p>Tall Buildings</p> <p>7. There are several references to tall buildings in the SDP, each one detailing the constraints that must be applied to their situation. In</p>	<p>Noted. The Views document is clear that the heritage significance relates to the designated heritage asset and that townscape value is an assessment of appearance and character of existing townscape, including built form and open spaces which are not designated heritage assets. It is considered that medium is appropriate given its distance and scale from the site. It should be noted that ‘High’ townscape value does not afford ‘protection’ from changes. The importance of the treeline is noted in its description.</p> <p>Noted.</p>
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	<p>particular we welcome at 6.2</p> <p>“Clusters of tall buildings will not be supported. Landowners should work together to agree the strongest positions for isolated points of height. These buildings must be of an exceptional architectural design that can be appreciated from their base at street level and from a distance”.</p> <p>Applying those constraints we submit there is no place for “isolated points of height” or any other form of tall building that would be harmful the Scrubs skyline and in particular to the view as shown in View 15 above.</p> <p>Pressure on Open Space</p> <p>8. The pandemic has seen unprecedented footfall on all local areas of open space, in particular the Scrubs. With the easing of restrictions that footfall may be reduced but it is quite likely not to fall back to pre-pandemic levels. We note as part of the Introduction a panel that includes “NEW OPEN SPACES AND LINKS TO PARKS”. Among the references to open spaces there appears at 6.3 under “Environmental and Sustainable Design”</p> <p>“CH8 – A carefully considered neighbourhood that does not compromise comfort and the enjoyment of open spaces taking account of the effects of taller buildings on wind, daylight and temperature conditions.”</p> <p>We submit the SDP should, consistent with the London Plan and NPPF, strive for self-sufficiency of open space within the Kensal Canalside area. We trust that room will be found for such open space so as to avoid unnecessarily increasing the footfall on the Scrubs.</p> <p>9. As for Links to Parks we note with a some anxiety at 3.1</p>	<p>Noted. The height map is indicative only and the accompanying text has been amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan.</p> <p>Noted.</p>
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		<p>“The development will introduce pedestrian access from the southern site into Little Wormwood Scrubs and new links into the OPDC development site to the west”. We would support the Friends of Little Wormwood Scrubs in opposing this proposed pedestrian access into their already high footfall small park.</p> <p>We would point out that access to the north of the Scrubs from the proposed OPDC development adjacent to the HS2/Elizabeth Line terminus has been the subject of much debate and is now not contemplated within the life of the current OPDC Draft Local Plan.</p>	<p>Applications will be determined in line with the Development plan. The SPD seeks to ensure that open space and green space is optimised on the site.</p> <p>Noted. The SPD promotes connectivity with Little Wormwood Scrubs both for existing users of the park to access the new development at Kensal Canalside and vice versa. The Local Plan identifies Little Wormwood Scrubs as an area where public realm and space improvements should be delivered.</p> <p>Noted.</p>
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30	Sir Stephen Waley-Cohen	<p>I am very concerned about the excessive number and height of tall buildings, which will spoil the views from Wormwood Scrubs. As is well known, individual tall buildings, and clusters, also create appalling wind effects.</p> <p>There isn't enough open space planned within the site, relying on other open spaces, such as Kensal Green Cemetery (totally unsuited to the purpose) and Little Scrubs, already quite busy, and Wormwood Scrubs, not close enough to be very useful to residents of the new homes.</p> <p>There is a significant lack of sufficient public transport and there will be a huge increased traffic density, even if only a proportion of new residents and workers use private cars. Hopes by planners for reduced car use is not being borne out by reality, despite efforts to make it more difficult and expensive, which is not just for lockdown, and emerging from lockdown, anxiety reasons, but because people want the convenience of door to door access, as you will know.</p> <p>Nearby, North Pole Road and its entrances from Barlby Road and St Quintin Avenue are totally choked every evening and worse on Fridays; Barlby Road into Ladbroke Grove (even when no roadworks) is very bad, as is Ladbroke Grove northwards and Chamberlaine Road. Extra buses and cars (whatever planners hope) will make it even worse.</p> <p>There will also need to be considerable additional infrastructure related to healthcare and education to which the developers should be major contributors.</p>	<p>The height map is indicative only and the accompanying text has been amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan.</p> <p>Noted. The SPD promotes the optimum delivery of usable public open green space in line with the Development Plan. Any application would need to submit a public realm strategy that includes full detail of quantum and quality of public and green space.</p> <p>Text has been added to clarify the expected contributions to the underground network to ensure that capacity is managed.</p> <p>The SPD promotes a largely car free development. New text has been added to clarify that a local network traffic model created for the Council in conjunction with TFL has been created to assess any forthcoming applications.</p>
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			<p>Noted, see above.</p> <p>The SPD sets out that any application will need to ensure adequate provision for healthcare and education is provided to meet additional demand. This will be assessed in conjunction with the NHS in relation to healthcare.</p>
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31	The Friends of Kensal Green Cemetery	<p>Kensal Canalside Opportunity Area – Supplementary Planning Document Thank you for sending us notification of this document’s publication. The Friends of Kensal Green Cemetery (FoKGC) is a charity dedicated to the preservation, conservation and restoration, for the public benefit, of the Cemetery of All Souls, Kensal Green — in particular, the monuments, buildings and burial records.</p> <p>Kensal Green Cemetery is Britain’s most prestigious cemetery – opened in 1833, it is the first of the Magnificent Seven cemeteries in London (the other M7 cemeteries – Norwood 1837; Highgate 1839; Nunhead 1840; Abney Park 1840; Brompton 1840; and Tower Hamlets 1841 – came later and largely followed the Kensal Green model).</p> <p>The Cemetery has one Grade I listed building (the Anglican Chapel); twelve Grade II* listed structures / monuments; and 146 Grade II listed structures / monuments. In addition, the Cemetery itself is listed Grade I on the Register of Parks and Gardens.</p> <p>The Cemetery is the resting place of some 1,000 individuals whose biographies appear in the Oxford Dictionary of National Biography, including two grown-up children and one grandchild of King George III; Isambard Kingdom Brunel; William Makepeace Thackeray; Harold Pinter and numerous others. The General Cemetery Company, established by Act of Parliament 1832, remains the burial authority for the Cemetery. This is unique among the major London cemeteries. I set out below the concerns of FoKGC about the proposals.</p> <p>Bridge access(es) into the Cemetery The Cemetery has been (and remains) a private operating cemetery, i.e., a place of burial and cremation - and a place of quiet reflection and</p>	<p>Noted.</p> <p>The SPD states that high quality public green spaces must form</p>
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	<p>contemplation since the opening of the Cemetery 1833 (and it is definitely not a park or public playground). The plan for bridge access seems set to destroy this peaceful ambience with numerous people traipsing into the Cemetery seeking green space (possibly because the development lacks sufficient green space of its own).</p> <p>The landing point(s) of the bridges is/are likely to bring pedestrians into the Cemetery over existing graves which is obviously inappropriate and I doubt the Ministry of Justice would grant exhumation licences simply in order to allow commuters (and – even worse – cyclists (page 29), which are banned in the Cemetery anyway) a short-cut to a tube/railway station. The best route to Kensal Green station from the Opportunity Area would be via Ladbroke Grove and Harrow Road, possibly with a cycle scheme or hopper buses.</p> <p>Route through the Cemetery</p> <p>On page 30 of the SPD, RBK&C proposes to facilitate access during cemetery opening hours – the timing of access would be of no use for commuters as the Cemetery is open from 9 am daily and it closes at 4 pm in the winter and 5 pm in the summer.</p> <p>The security of the Cemetery (i.e., the monuments, the risk of anti-social behaviour vandalism etc.) would be threatened by any walkway through the Cemetery. And any protected corridor through the Cemetery (as has been done at Tottenham Cemetery) would have a catastrophic effect on the character of the Cemetery.</p> <p>Why not access the GWR / Crossrail which runs along the south side of the Opportunity Area (which is much closer)? RBK&C proposed ‘Portobello’ station (to be constructed close to the site of the Grocery store) some time ago – but the Borough seems to have gone very quiet on this planned station.</p>	<p>part of a clear narrative and be designed into the masterplan at an early stage.</p> <p>The SPD requires that developers work closely with the cemetery company to unlock opportunities for connectivity. The complexity of delivering such a bridge is acknowledged and early engagement encouraged with key stakeholders.</p> <p>Noted. Additional text has been added to ensure route design secures safe access and responds to the special historic interest of the registered cemetery landscape.</p>
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	<p>Rake of Buildings in the KCOA Looking at the proposals, we feel that three storeys are high enough for developments on the north of the site: this would be kinder to the Cemetery. One of the most important aspects of any development would be the geometries and the materials used. The trigger for design really should be the traditional scale, fenestration, methods of construction and detailing of existing nineteenth- and early twentieth-century developments.</p> <p>The definition of ‘historic sensitivity, ground difference levels, proximity to surrounding residential townscape, and potential impact on residential amenity’, etc., is far too vague (and couched in pidgin English wide open to interpretation to anything desired).</p> <p>Statements that developers should carefully consider the relationship of new works with the conservation area and should preserve or enhance character etc., means nothing. Precise language and definitions are essential.</p> <p>Views to the Surrey Hills A Views Study has been prepared by RBK&C, and ignores the prospect first identified in the Penny Magazine of August 1834 (page 299) which wrote of Kensal Green Cemetery that: a very delightful view, bounded by the Surrey Hills, is commanded over the western environs of the Metropolis. The importance and significance of these views seems to be ignored by KCOA.</p> <p>Views Study (November 2019) FoKGC has already told RBK&C of its concerns that the Views Study is</p>	<p>The SPD confirms at 7.3 that an Elizabeth Line station has not yet been proven feasible and no further feasibility work is anticipated within the lifetime of the Local Plan. Transport for London and Network Rail have confirmed that for the foreseeable future they will be concentrating on nationally significant infrastructure projects.</p> <p>The height map is indicative only and the accompanying text has been amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan.</p> <p>The SPD provides 4 clear reasons why areas may be more suitable for lower buildings relating to the site constraints. Further contextual analysis is provided in the background document.</p>
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	<p>flawed – in that we feel the Views Study mainly concentrates on east-west views and the photographs do not accurately reflect the likely visual impact as they are taken from behind trees and bushes in order, we feel, to minimise the visual impression of the proposed development. We still await an answer on this concern.</p> <p>Access to the KCOA Site</p> <p>The KCOA plan as outlined in the SPD envisages (as a minimum) 3,500 households (so, by my estimate, at least 12,000 residents) plus the footfall of deliveries and shoppers into the Grocery store and other visitors with just one real point of ingress and egress onto Ladbroke Grove by Canalside House seems a very risky strategy.</p> <p>Other comments</p> <p>On page 38 of the SPD, RBK&C writes about ‘Supermarket Street’ and on page 41 ‘Superstore street’ – which is it?</p> <p>On pages 44 and 88, RBK&C uses the abbreviation ‘SUDS’. This does not appear in the Glossary, where the term ‘SuDS’ does appear.</p> <p>On page 71 of the SPD, RBK&C states: Development must seek to deliver: CH2 - Development that responds to and does not cause unacceptable harm to the significance of the heritage assets. The concepts of ‘unacceptable harm’ and, conversely, of ‘acceptable harm’ are subjective and liable to interpretation to suit individuals and groups. Some clear and urgent parameters and definitions are needed before judgements about this scheme can get underway. It needs to be transparent as to who is making such judgements and to whom they are accountable.</p>	<p>Wording has been amended to align with NPPF and Development Plan policies.</p> <p>The Council notes this was a remark made in what was popular press at the time of publication. It is considered to state the situation in 1834, when this part of London was virtually undeveloped. This has inevitably changed with the urbanisation and increase in scale of buildings in west London. The Council have tested this from viewpoints around the Anglican chapel, a high point of the site. Whilst it is possible to see a range of green hills looking south west, to the due south, in the direction of the KCOA, views are already obscured or lost due to developments over the past hundred or so years. However, when viewed to the south west it is not actually over the KCOA site. So, to the extent that these views survive at all, they would still be likely to exist after the site was developed, subject to changes beyond our control within other parts of London.</p>
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			accompanied by a Statement of Heritage Significance and a Heritage Impact Assessment.
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32	Vicky Caplin - the sixteen trust	<p>The proposal document appears to be flawed and disingenuous in many aspects. It is more of a glossy presentation than a document that properly details what the developers really have in mind for the site.</p> <p>They are talking of a MINIMUM of 3,500 homes, it could go up to 5000, which is a lot.</p> <p>I believe it is purposely misleading in how it suggests there could be a new railway station and a link across to Kensal Green station through the cemetery. The station is not planned and the link is probably unworkable and on private land that does not relate to the site.</p> <p>There is no detail about how any access through the cemetery would be supervised. There is talk of a cycle route through the Cemetery - bikes should not be allowed into the Cemetery; it is a working cemetery of historic importance, where relatives may pay their respects to the departed. It is not a thoroughfare.</p> <p>The most alarming matter when they start to address density and block height.</p> <p>It is very vague apart from the horrific reference to Trellick tower in terms of a height reference for the higher blocks.</p> <p>They are saying they could build up to 20 stories high on any part of the site, not just the lower south side; mentioning the Trellick tower as a referable height is a red herring – the tower is not nearby.</p> <p>We believe no buildings should be higher than 10 Storeys.</p> <p>Ballymore were the developers of the recent fire in a block in canary Wharf.</p> <p>Also how will Ladbroke Grove not be impassable for many years while the</p>	<p>Noted.</p> <p>Kensal Canalside has been allocated to deliver a minimum of 3,500 homes in the Local Plan. The SPD sets out the Council’s approach to ensuring the optimum delivery of high quality affordable homes given the housing needs of the Borough.</p> <p>Noted. The SPD confirms at 7.3 that an Elizabeth Line station has not yet been proven feasible and no further feasibility work is anticipated within the lifetime of the Local Plan. Transport for London and Network Rail have confirmed that for the foreseeable future they will be concentrating on nationally significant infrastructure projects. The SPD allows for the potential provision of a station if it was to come forward in the future. The expectations are clearly set out regarding development in the absence of a station.</p> <p>The SPD route through the cemetery is indicative only. This detail would be expected at planning application stage and should be brought forward in</p>
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		<p>work is going on? It was hardly dealt with on the recent zoom call with the developers.</p> <p>The commitment to providing social or affordable housing is scant and Ballymore are more of a luxury developer going by their property portfolio.</p> <p>Many developers promise much in terms of affordable housing and then withdraw, stating financial non feasibility.</p> <p>RBKC will need to provide assurance that they will not accept a withdrawal of social housing post approval.</p>	<p>conversation with the Cemetery Company. The use of any route would need to be agreed by the Cemetery company and Council.</p> <p>Reference to Trellick Tower has been removed and new text added to clarify how tall buildings will be assessed in line with Policy D9 of the London Plan.</p> <p>The Council is committed to ensuring the highest levels of fire safety for every resident in the borough. While we do not control land ownership of the site, any applicants will have to submit a fire statement demonstrating exemplar fire safety standards as set out in the London Plan, 2021.</p> <p>New text has been added to clarify that a local network traffic model created for the Council in conjunction with TFL has been created to assess any forthcoming applications.</p> <p>A Construction Traffic Management Plan is required of the developers as set out in the Delivery chapter.</p> <p>The Council do not control land ownership of the site.</p> <p>The policy position on affordable housing is established in both the Local</p>
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			<p>Plan and London Plan. The SPD is clear in its promotion of delivering the optimum number of affordable homes on the site.</p> <p>The Council policy requires the delivery of the maximum reasonable level of affordable housing and would seek to secure this through any planning application.</p>
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33	Kathy McGuigan	<p>My house is directly over the road from the KG Cemetery, part of the LB Brent Kensal Green Conservation Area. I am NOT happy with the proposals.</p> <p>It is far too dense a development proposed in a small, hard to access area. 3500 flats is too many in my opinion. Ballymore do not have a track record of affordable housing I believe, and I think this buzzword will be used to get planning permission then become “financially unviable” and not be built.</p> <p>I am also alarmed about Trellick Tower being used as a nearby height reference. It is not nearby and should not be used as an argument to have other very high blocks on this site.</p> <p>I am not convinced that so many apartments are really needed in this area anyway.</p> <p>If the pandemic has taught us anything, it is that high quality well planned outside space is essential and highly valued for people’s mental and physical health. There does not seem to be much provision for this on such a packed site.</p> <p>Access will be a significant issue, both during construction and afterwards. There will be much increased traffic and congestion in an already busy and polluted area.</p> <p>The talk of a cycle/ footbridge to KG Station is just talk. There are so many problems with it... The cemetery is owned by a private company with freeholders owning their burial plots. There would need to be agreement from them. There would be many security / safety issues with it. How</p>	<p>Noted.</p> <p>Kensal Canalside has been allocated to deliver a minimum of 3,500 homes in the Local Plan. The SPD sets out the Council’s approach to ensuring the optimum delivery of high-quality affordable homes given the housing needs of the Borough. The Council policy requires the delivery of the maximum reasonable level of affordable housing and would seek to secure this through any planning application.</p> <p>The height map is indicative only and the accompanying text has been amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan.</p> <p>The Council’s housing waiting list consists of over 3300 on the housing register. Of these circa 2,300 are in temporary/homeless households.</p> <p>Noted. The SPD highlights the importance of health and wellbeing. It promotes the optimum delivery of usable public open green space in line</p>
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	<p>would it be lit? Would that be appropriate over a cemetery? Overlooking funerals/ mourners would be inappropriate. Maintenance/ cleaning of the bridge? Security of users? What would happen if there was an accident/ incident on the bridge? How would it affect residents if the canal boats at their moorings? Access to KG tube is already problematic for many with such a lot of stairs.</p> <p>I believe this idea has been cynically thrown in as a sop to give people the impression that access will be much better than it actually will be.</p> <p>The reference to an Elizabeth Line station is also misleading as TfL has said it's not going to happen.</p> <p>Residents such as myself in Harrow Rd will have the amenity of our houses reduced by such a huge development. We currently have a view over the cemetery and used to see the airy light gasometers. These have now, sadly, been removed. A significant reduction in our sky view would be obliterated by huge blocks of flats, which would be especially awful in the winter months without the greenery of the trees in leaf to mitigate the effects.</p>	<p>with the Development Plan. Any application would need to submit a public realm strategy that includes full detail of quantum and quality of public and green space.</p> <p>The SPD promotes a largely car free development. New text has been added to clarify that a local network traffic model created for the Council in conjunction with TFL has been created to assess any forthcoming applications. The SPD requires the submission of a construction traffic management plan with applications relating to the KCOA site.</p> <p>A bridge over the canal and improvements to the cemetery are included in the Local Plan Allocation. The amendments to text have been made to include the direct impacts on the cemetery of a route through it. They include the requirement for planning applications to be accompanied by a Statement of Heritage Significance and a Heritage Impact Assessment to include any necessary mitigation of harm. Text has been added to clarify the expected</p>
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			<p>contributions to the underground network to ensure that capacity is managed. Any route through will be subject to access arrangements agreed by the cemetery company.</p> <p>The SPD confirms at 7.3 that an Elizabeth Line station has not yet been proven feasible and no further feasibility work is anticipated within the lifetime of the Local Plan. Transport for London and Network Rail have confirmed that for the foreseeable future they will be concentrating on nationally significant infrastructure projects.</p> <p>Noted. Views of the development from a variety of distances will be taken into consideration in any planning assessment.</p>
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34	Kensal Triangle Residents Association	<p>KTRA comments on the Kensal Canalside Development Proposal</p> <p>Overall this is a glossy PR document aimed to mislead on a few key issues and offering no accountability to local residents during the project for keeping to conditions. The proposal needs reworking and significant improvements in a few key areas:</p> <p>Preservation of the prospect & height limits.</p> <p>Penny magazine in 1834 wrote about this view of the Surrey hills from Kensal Green Cemetery “a very delightful view, bounded by the Surrey Hills, commanded over the western environs of the Metropolis”.</p> <p>From Kensal cemetery it is possible still today to see the Surrey hills south of London, an important solace to those bereaved visiting the graves of loved ones, and also a beauty spot for local residents and those interested in sites of historical significance in the cemetery. The friends of Kensal Green cemetery are appalled by the loss of prospect from the cemetery proposed by the developers.</p> <p>We therefore submit that the development must preserve that view. Certainly at 10 storeys this will be impossible, but at least on large sections of the development the view should be preserved, which means that along large sections of the development it should not rise above 4-5 floors, and in a few places at least there should be gaps to lower levels.</p> <p>Having the development lower on the canalside than the railway side makes no difference to the prospect and views to the horizon that can currently be enjoyed. London has few views to the horizon and this must be preserved from the cemetery.</p>	<p>Noted.</p> <p>The height map is indicative only and the accompanying text has been amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan.</p> <p>Noted, as above.</p>
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		<p>The friend of the cemetery have also noted the sly nature of the drawings produced by the developers as photos are taken “from behind trees and bushes in order, we feel, to minimise the visual impression of the proposed development.”</p> <p>Social housing</p> <p>The definition of affordable housing is quite revealing – few can afford what this definition requires. The portion that is affordable should be increased, and the definition of what is affordable should be made reasonable based on what poorer residents can actually afford based on a transparent data driven formula that can be held accountable. It is usual for developers like Ballymore to “discover” they cant keep their promises once work has started because of “unforeseen” costs. There should be stringent financial penalties for breaking promises worked into contracts.</p> <p>Three issues around Access.</p> <p>There are a number of issues around access.</p> <p>Firstly the way into and out of the site on Ladbroke Grove shows no serious responsible consideration. Ladbroke Grove on this pan will be backed up for years during the development with horrific local air pollution consequences. Nothing has been proposed to ameliorate this.</p> <p>Secondly the impression is given that access can be arranged via the cemetery and over to Kensal rise station. This should be a non starter. A municipal walk over the cemetery cant work; and a bounded path through the cemetery will be safety hazard and also destroy the solace of</p>	<p>Noted. Clarity has been added to the text to indicate the standards for views that should be submitted with any application.</p> <p>Affordable Housing and ‘Community is defined in the London Plan and RBKC Community Housing SPD. The SPD sets out the Council’s approach to ensuring the optimum delivery of high quality affordable homes given the housing needs of the Borough. The Council policy requires the delivery of the maximum reasonable level of affordable housing and would seek to secure this through any planning application. Any application will be determined in line with the policies within the Development Plan and any other material planning consideration.</p>
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	<p>the cemetery. The plans in this regard are simply not good enough and need to be sent back. It is quite extraordinary the council have not demanded better thinking through of this aspect of the proposal. It shows scant regard for the bereaved and for local history and beauty.</p> <p>Thirdly It is also completely false to imply any possibility of the Elizabeth line stopping here. We already know it will not and this being allowed to stay within the proposal is intentionally giving a false positive impression.</p> <p>Carbon footprint.</p> <p>There are anodyne pleasantries about ecology but no effort to measure the carbon footprint of the development, this should be standard procedure by now. Both its start up impact and also ongoing running impact.</p> <p>Safety record</p> <p>Ballymore have a very poor record on safety – we all know about the recent fire under their watch. For obvious local reasons we would expect more openness about these risks and efforts to give assurance.</p> <p>Medical and educational facilities</p> <p>There is vague mention of supplementing existing facilities paid for by the development. We need to see some kind of formula that is data-drive about how x % more use results in x% more facilities, so the project can be held accountable for delivery.</p>	<p>The SPD promotes a largely car free development. New text has been added to clarify that a local network traffic model created for the Council in conjunction with TFL has been created to assess any forthcoming applications. The air quality objective for any development is set out in the SPD at CH5.</p> <p>The delivery of a bridge over the canal is set out in the Local Plan allocation. The SPD sets out that any proposal will have to be agreed in conjunction with the Cemetery Company.</p> <p>Text has been added to require a heritage impact assessment.</p> <p>The SPD confirms at section 7.3 that an Elizabeth Line station has not yet been proven feasible and no further feasibility work is anticipated within the lifetime of the Local Plan. Transport for London and Network Rail have confirmed that for the foreseeable</p>
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	<p>Related comments:-</p> <p>The proposal document appears to be flawed and disingenuous in many aspects. It is more of a glossy presentation than a document that properly details what the developers really have in mind for the site.</p> <p>We believe it is purposely misleading in how it suggests there could be a new railway station and a link across to Kensal Green station through The cemetery. The station is not planned and the link is probably unworkable and on private land that does not relate to the site.</p> <p>The most alarming matter when it starts to address density and block height. It is very vague apart from the horrific reference to Trellick tower in terms of a height reference for the higher blocks. We believe no buildings should be higher than 10 Storeys.</p> <p>The commitment to providing social or affordable housing is scant and Ballymore are more of a luxury developer going by their property portfolio. Many developers promise much in terms of affordable housing and then withdraw, stating financial non feasibility. RBKC will need to provide assurance that they will not accept a withdrawal of social housing post approval.</p>	<p>future they will be concentrating on nationally significant infrastructure projects.</p> <p>Environmental sustainability is a 'golden thread' that runs throughout the SPD. The SPD can only provide further guidance to the adopted development plan policies. Specific objectives are highlighted at section 6.3 whereby further text has been added relating to the Greening SPD which provides further guidance for developers. Additional detail is not possible without a masterplan at application stage.</p> <p>The Council is committed to ensuring the highest levels of fire safety for every resident in the borough. While we do not control land ownership of the site, any applicants will have to submit a fire statement demonstrating exemplar fire safety standards as set out in the London Plan, 2021.</p> <p>The SPD sets out that any application will need to ensure adequate provision for healthcare and education is</p>
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			<p>provided to meet additional demand. This will be assessed in conjunction with the NHS in relation to healthcare. Both healthcare and education need will be assessed using need and existing capacity calculations.</p> <p>Noted. The document sets out the Council's guidance for the delivery of a successful development.</p> <p>The SPD confirms at section 7.3 that an Elizabeth Line station has not yet been proven feasible and no further feasibility work is anticipated within the lifetime of the Local Plan. Transport for London and Network Rail have confirmed that for the foreseeable future they will be concentrating on nationally significant infrastructure projects.</p> <p>The height map is indicative only and the accompanying text has been amended to clarify that tall buildings</p>
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			<p>will be assessed in line with Policy D9 of the London Plan.</p> <p>The SPD sets out the Council's approach to ensuring the optimum delivery of high quality affordable homes given the housing needs of the Borough. Applications will be determined in line with the Development Plan.</p>
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35	Thames Water	<p>Thank you for consulting Thames Water on the above document. Thames Water is the statutory sewerage and water undertaker for the borough and we have the following comments to make on the consultation.</p> <p>Specific Comments</p> <p>We have capacity concerns for both water and waste water for the opportunity area so would like developers to engage with us at the earliest opportunity. Part of the borough affects the Counters Creek catchment where careful consideration of surface water drainage is required. The potential to remove surface water flows from the combined sewer network can help to provide additional capacity for new development and address the impacts of climate change.</p> <p>Given the above concerns Thames Water support the references to development seeking to deliver integrated water management plans which can help to reduce the demand for potable water and reduce the quantity and rate of flows to the combined sewer network. We would also welcome the councils support in encouraging developers to engage with us at an early stage and suggest that supporting text is added to Section 7.3 in relation to infrastructure delivery to state that:</p> <p>“Developers are encouraged to engage with Thames Water to discuss water demand and drainage requirements ahead of the submission of any application and to incorporate the outcomes of these discussions in the required infrastructure delivery strategy and integrated water management plans.”</p> <p>Where there are capacity concerns and upgrades are required, phasing conditions may be necessary to ensure that development is not occupied prior to the delivery of any necessary infrastructure upgrades.</p>	<p>Noted. Wording added to encourage early engagement.</p> <p>Noted. To be determined at application stage.</p>
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		<p>Additional Comments</p> <p>Existing sewers run through the area covered by the proposed SPD. Careful consideration will be required in relation to any construction works to ensure that they do not impact on existing assets. This may result in a need to agree piling methodologies to avoid adverse impacts on existing infrastructure.</p>	<p>Noted. A construction method statement will be necessary to align with the RBKC Local Plan.</p>
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	<p>replacement is of, at least, equivalent quantity, quality and accessibility as the existing provision. Sport England would like to make clear that any other sports facilities that might be within the area covered by the SPD should also be protected, unless adequately replaced in line with the NPPF and Sport England Policy.</p> <p>Future Demand</p> <p>The SPD seeks at least 3,500 new homes on the site. The occupiers of these new homes will generate demand for sporting provision. The existing provision within the area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Sport England, therefore, considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. Sport England notes that the SPD makes reference to providing new sport facilities but this level and nature of any provision should be informed by a robust evidence base such as an up to date Sports Facilities Strategy, Playing Pitch Strategy or other relevant needs assessment which the Council currently do not have. As a result it would be difficult to robustly and soundly plan for future needs arising from the development of Kensal Canalside at this stage.</p> <p>Active Design</p> <p>The SPD seeks notable growth and regeneration within the area which is likely to have an impact on the current design and layout of Kensal Canalside. Sport England considers that the design of where communities live and work is key to keeping people active and placemaking should create environments that make the active choice the easy choice. Sport</p>	<p>Noted. Applicants will need to ensure they meet any identified need at the time of an application being submitted.</p> <p>Noted. The SPD promotes active travel and aligns with the Development Plan policies relating to this in the London Plan, 2021. The SPD does not preclude</p>
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	<p>England, along with Public Health England, have launched guidance, Active Design, which intends to inform the urban design of places, neighbourhoods, buildings, streets and active open spaces to promote sport and active lifestyles. The guide sets out ten principles to consider when designing places that would contribute to creating well designed healthy communities which has considerable synergy with many elements that appear throughout the SPD such as facilitating Active Travel, using Healthy Streets and walkable neighbourhoods. Sport England support this stance throughout the SPD but encourages that links between the SPD and Active Design are developed further and are really drawn out in the SPD by having clear references to Active Design, its principles and the Active Design Checklist within the SPD. Active Design principles and the checklist, for example, could be added to the design requirements Policy CH1. More information on Active Design, including the guidance, can be found via the following link;</p> <p>http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/</p> <p>In addition, The Town and Country Planning Association, with Sport England and others, have developed guidance relating to '20-minute neighbourhood' (or 15-minute cities) which may also be of assistance when developing the SPD. This guidance can be found at https://www.tcpa.org.uk/the-20-minute-neighbourhood</p> <p>I trust the above is of some assistance. If you have any questions or would like any further advice please do not hesitate to contact Sport England via the details provided.</p>	<p>developers from following additional guidance relating to active travel.</p> <p>Noted</p>
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37	<p>BALLYMORE GROUP AND SAINSBURYS SUPERMARKETS LTD</p>	<p>Draft Kensal Canalside Supplementary Planning Document (SPD) Representation on behalf of Ballymore Group Limited and Sainsbury's Supermarkets Limited</p> <p>We write on behalf of our clients, the Ballymore Group and Sainsbury's Supermarkets Limited (hereafter referred to as 'Ballymore and SSL'), to make representations on the Draft Kensal Canalside Supplementary Planning Document (SPD) (hereafter referred to as 'the Draft SPD').</p> <p>The whole Opportunity Area is under multiple land ownerships, including RBKC, St William and the Department for Transport, alongside our clients, Ballymore and SSL. The Ballymore and SSL land is bordered by the Grand Union Canal to the north, Ladbroke Grove and a parcel of RBKC land to the east, Great Western railway lines to the south and the St William parcel of land (which also forms part of the Opportunity Area) to the west. Ballymore and SSL therefore have an intrinsic interest in the Draft SPD and have been working alongside Council Officers to develop an early masterplan for the Opportunity Area.</p> <p>Comments on the Draft SPD</p> <p>Firstly, we would like to thank you for providing us with the opportunity to comments on the Draft SPD, we are very pleased to be engaged in this collaborative process.</p> <p>Overall, we consider the Draft SPD to be positively worded and support its overall aims and ambitions in seeking to ensure a successful and inclusive redevelopment of the Kensal Canalside Opportunity Area (hereafter referred to as 'the KCOA').</p> <p>Our shared objective is to ensure that the SPD and its policy aspirations are deliverable and supported by a robust evidence base. This will ensure any forthcoming development on the KCOA is of high quality, meeting the needs of existing and incoming residents and businesses whilst also being</p>	<p>Noted</p>
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	<p>viable and deliverable.</p> <p>The SPD is intended to set out site specific guidance for the Kensal Canalside Opportunity Area and will sit beside adopted strategic and local planning policy. With this in mind, it is important that the SPD provides sufficient flexibility and isn't unduly prescriptive on the approach to be taken by future development to ensure the overall ambitions of the KCOA can be achieved whilst delivering a high-quality development which is viable and deliverable.</p> <p>We fully support the key objectives of the Draft SPD to deliver a minimum of 3,500 new homes and new employment opportunities by transforming the Draft SPD area into a high-quality, well-connected, and sustainable neighbourhood for people to live, work and visit. However, we have a number of comments on the Draft SPD which we hope will assist in achieving the policy objective for the Opportunity Area. The following section provides more detailed comments on the Draft SPD by chapter.</p> <p>Introduction</p> <p>Ballymore and SSL support the Council's recognition that redevelopment of the KCOA will need to be of a high density to achieve the Council's housing, affordable housing and infrastructure ambitions. The delivery of a high-density scheme is integral to ensuring the scheme is viable when achieving the Council's affordable housing targets and it must be recognised that a reduction in density or the number of homes delivered will inevitably reduce the number and proportion of affordable housing which the redevelopment can reasonably and viably support.</p> <p>2.4 Opportunities</p> <p>Ballymore and SSL support the opportunities identified within the plan shown on page 21, however, it should be clear that opportunities such as</p>	<p>Noted.</p> <p>Noted</p> <p>The title 'Opportunities' makes it clear that there is a potential for these to be</p>
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	<p>the new bridges and basin are shown in indicative locations on this plan and these locations aren't fixed. This can be included by simply including notional or indicative within the key, as has been done on the maps shown on pages 26 and 32.</p> <p>3.1 New and improved walking and cycling connections The indicative connections diagram shown on page 26 includes a potential cycle link through the cemetery, as well as the new pedestrian and cycle bridge over the canal. However, there is no consideration of how this would be managed or achieved, particularly as the cemetery is outside of the opportunity Area and the delivery of this link would therefore be subject to third party agreement. The Draft SPD also doesn't appear to give consideration to potential direct heritage impacts that could be caused by the provision of a canal bridge or a link through the cemetery which will need to be agreed with Historic England.</p> <p>Page 27 of the Draft SPD states that "changes in ground level must be avoided". Given the size of the KCOA and the existing land level changes, ground level changes across the site will be inevitable without a significant cut and fill exercise which will be both costly and wasteful. However, the proposed redevelopment scheme will ensure equitable access across the KCOA in accordance with Draft</p> <p>Policy CO1. Page 29 of the Draft SPD states that the railway bridge should be "delivered to specific construction phases" but it isn't clear what this means or what construction phases the Council expects the bridge(s) to be delivered in line with. The northern landing point of the railway bridge would fall within the Ballymore and SSL land and it is recognised that any application would need to safeguard land to facilitate the delivery of the</p>	<p>realised to deliver the vision for the site.</p> <p>Additional wording has been included relating to any direct heritage impacts to the cemetery as a result of bridge access and routes. The SPD is clear that any access would be subject to agreement with the Cemetery Company.</p> <p>The use of the word 'avoided' implies that this be done where possible. Any development will be assessed in line with Development Plan policies with regards to accessibility.</p>
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	<p>bridge, including a level of funding. It is anticipated that this will be secured through a legal agreement attached to any planning permission granted. However, it should be recognised that the delivery of the railway bridge is subject to third party land (the Department for Transport own the land to the south of the railway) so the bridge is unable to be delivered without their agreement and a scheme coming forward on the southern portion of the KCOA.</p> <p>Ballymore and SSL therefore cannot support a position which requires the delivery of this bridge prior to commencement or occupation of any phase of the redevelopment of the Ballymore and SSL land; a Grampian condition or obligation such as this would risk the deliverability of the whole scheme. Nonetheless, any future planning application will still demonstrate that the scheme is still able to be delivered successfully without the railway bridge.</p> <p>Nonetheless, we are happy to continue working with RBKC and the GLA to determine the best way of securing delivery of the bridges including a financial contribution and protection of a landing point as set out above.</p> <p>Given the unknown timeframes for the delivery of the Department for Transport site to the south of the railway, and therefore the unknown timeframe for the delivery of the railway bridge, the proposed redevelopment scheme will ensure that the scheme works with and without the bridge in terms of connectivity and access to public transport and other services.</p> <p>Policy CO4 notes that cycle docking stations should be delivered as agreed with TfL at appropriate locations within the site. Transport Consultants, WSP, are already in discussions with TfL about an extension of the Santander cycle hire scheme into the site, including the need to include an</p>	<p>The Council consider the bridge essential to ensuring delivery of the vision for Kensal Canalside. Landownership issues are recognised within the SPD. However, developers will be expected to work with the Council to ensure that the bridge is delivered at an appropriate time to ensure the success of the site.</p> <p>Noted. As above.</p>
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	<p>additional location outside of the site to regulate demand.</p> <p>Page 27 of the Draft SPD also notes that the Council are requiring a new direct alternative cycle route through the northern part of the site in response to local residents raising concerns over friction between fast cyclists and pedestrians on the towpath. It should be clarified whether this new route is in reference to The Avenue, South Drive or along the Canal. Ballymore and SSL are in discussions with the Canal and Rivers Trust (CRT) in order to provide evidence to support improvements to the Canal which respect existing residents and habitats, and whilst we will be making the case for increased access this has to be carefully managed.</p> <p>Page 28 of the Draft SPD notes that 90% of respondents to the Council's Built ID Poll considered the current pedestrian access is average to poor therefore in response, the Council are requiring new connections into the site for pedestrians and improved access at the Ladbroke Grove junction. WSP along with RBKC and TfL will design and agree an acceptable junction design which meets the needs of all users, with a focus on pedestrian and cycle improvements. It should be noted that if cycle and pedestrian improvements are to be provided that this may impact on general operation of the junction for traffic and buses. This is being assessed in the traffic modelling and will be reported in the Transport Assessment.</p> <p>3.3 Road access Policy CO9 states that development must seek to deliver a safe and improved junction on Ladbroke Grove and a new junction at Barlby Road. WSP is already working thorough the design and layout of the main junction, which may be a new signalised all movements junctions, to replace the existing roundabout and improve pedestrian and cyclist safety. The Draft SPD states 'Traffic to and from the superstore and the</p>	<p>Noted.</p> <p>Noted.</p> <p>The SPD allows for flexibility to ensure that an appropriate bicycle route that meets the needs of all users can be established through the masterplanning process. As the plans are indicative the SPD providing further direction on a map would not be helpful at this time without further work.</p> <p>Noted. New text has been added to clarify that a local network traffic model created for the Council in</p>
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	<p>western substations in the north should be diverted away from the heart of the site where pedestrians have priority'. The final road layout within the Ballymore and SSL land is yet to be determined, however, the current preferred option within the masterplan proposes to direct the majority of traffic through the central spine of the site, with buses using South Drive. The traffic modelling currently being undertaken will test this option and report on the impacts to ensure the best option is proposed. The SPD should therefore be amended to include further flexibility to allow alternative road layouts and hierarchies, should an alternative road layout be proven to be suitable.</p> <p>4.1 Public realm strategy Policy SS2 states that the development must seek to deliver a residential development which seeks to minimise car usage and prioritises sustainable forms of transport. The current wording of the Draft SPD is supported in that it is not explicit on requiring a 'car free' development. Given the relatively low current PTAL of the site, it is expected that a low level of car parking will be required for the residential element of the scheme. London Plan compliant blue badge parking spaces will also be provided and a strategy for electric charging on street will be developed to support the aspirations of the SPD.</p> <p>5.1 Live Draft Policy LWV1 states that 35% of new homes delivered on the KCOA should be genuinely affordable when delivered on private land, with 50% of new homes being genuinely affordable on former utilities land. This does not reflect the newly adopted London Plan or other references to utilities land later in the Draft SPD (on page 55) where it is recognised that the threshold level for affordable housing on utilities land should be 35% where it can be demonstrated that extraordinary decontamination, enabling or remediation costs must be incurred to bring a surplus utilities</p>	<p>conjunction with TFL has been created to assess any forthcoming applications.</p> <p>The maps are labelled as indicative and as above text has been added for clarification.</p>
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	<p>site forward for development. This should be enshrined in the policy and SPD for clarity and to ensure compliance with the adopted development plan.</p> <p>Ballymore and SSL support the recognition on page 52 of the Draft SPD that there is a need to deliver more than 3,500 homes across the KCOA to meet or get close to the 35% affordable housing policy requirement in accordance with initial viability and capacity testing that the Council have undertaken to date. This is supported by the early viability work that Ballymore and SSL have undertaken as part of early design development. Ballymore and SSL will continue to discuss viability with the Council to ensure affordable housing delivery is maximised on site and to ensure that affordable housing is always considered as part of discussions on density, height and housing delivery.</p> <p>The Draft SPD suggests that affordable housing will be measured by both habitable rooms and floorspace, this should be clarified and we would suggest that affordable housing is measured only by habitable room as this would align with the requirements of the newly adopted London Plan. Further, given the size of the site measuring affordable housing by habitable room would be a more appropriate method.</p> <p>Page 55 of the Draft SPD refers to industrial land which has a higher affordable housing requirement as set out by the London Plan (50% by habitable room). However, we would instead contend that the land should be referred to as cleared but 'former utilities land' rather than 'industrial land'. This approach would be consistent with the rest of the Draft SPD where 'utilities land' is referenced.</p> <p>Page 55 also includes a housing mix for both the affordable and market homes. While Ballymore and SSL have no objection to the proposed housing mix for the affordable homes, the mix included for the market</p>	<p>Noted.</p> <p>The supporting text makes this clear. Further repetition is not necessary.</p> <p>Noted.</p>
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	<p>homes is not considered to represent local need where a higher proportion of the smaller units (1 and 2 beds) is required. We would therefore request that a suggested housing mix for market homes is removed from the SPD and is instead replaced with a requirement to address local housing need at the time of submission of a planning application. It should also be recognised that greater flexibility in the market mix could allow for a greater proportion of affordable homes to be delivered on site, thereby further supporting the removal of the market mix requirements from the SPD.</p> <p>Page 56 of the Draft SPD sets out a need to provide specialist housing across the KCOA, including homes for people with learning disabilities, older people, those who experience mental health problems and looked-after children. The Draft SPD sets out identified requirements for each of these types of housing in terms of number of units, however, further information should be included on the requirements for each of these types of housing and whether they will count towards the overall affordable housing provision on site. It is also not clear how the specialist housing should be distributed across the KCOA and whether it should all be focused in one area of the masterplan or not.</p> <p>Page 56 also states that single aspect housing should be avoided where possible. While Ballymore and SSL support the ambition to minimise single aspect housing, it is not possible to deliver a comprehensive and high-density masterplan across the KCOA and avoid single aspect units. Further, when appropriately designed, single aspect units can still deliver high quality accommodation for future residents, including good levels of internal daylight and sunlight. We therefore suggest that the wording is amended to say that 'single aspect units should be minimised and north-facing single aspect units should be avoided'.</p> <p>5.2 Work Draft Policy LWV9 states that a minimum of 10,000sqm of new office /</p>	<p>Both are required for any future assessment as the Council requires floorspace while due to London Plan requirement we now also require habitable rooms.</p> <p>The text has been amended to clarify this position in relation to the London plan.</p> <p>The table has been removed and text amended to clarify that any planning application will need to meet the identified need at the time of application.</p>
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	<p>workspace should be delivered which reflects and supports the existing local cultural and creative industries. Ballymore and SSL support the ambition to provide workspace for creative and cultural industries and agree that these are appropriate employment uses for the Opportunity Area. However, earlier in the Draft SPD on pages 4 and 50, the document states that the KCOA will deliver a minimum of 10,000sqm of office floorspace, rather than workspace. We request that this is amended to always reference ‘workspace’ over ‘office floorspace’ to allow a flexible range of employment uses to be delivered rather than solely conventional office accommodation which may not be appropriate in this location. We would also suggest that 10,000sqm of workspace is not appropriate and is more than is needed across the KCOA. The Draft SPD doesn’t appear to include a robust evidence base for this quantum and further research undertaken by our team supports a lower provision, with focus on creative industries. We therefore request that the provision 10,000sqm of workspace is reviewed and reduced taking into account market evidence and demand.</p> <p>Page 60 of the Draft SPD suggests that affordable or low-cost workspace is required. This is currently not a policy requirement of the Local Plan, it should therefore be clarified what proportion of workspace provided should be low cost and whether there are any additional requirements for this space. This should be supported by robust evidence and included within any further viability modelling undertaken by both the Council and the landowners / developers.</p> <p>5.3 Visit</p> <p>The commitment within Policy LWV12 to re-provide the supermarket is welcomed and supports the Local Plan. However, we suggest the wording should be amended to the development must ‘relocate and upgrade Sainsbury’s supermarket’. This wording would be consistent with the wording in the recently adopted Local Plan.</p>	<p>The table has been removed and text amended to clarify that any planning application will need to meet the identified need at the time of application.</p> <p>The wording makes it clear that where possible this should be achieved. Where it cannot be avoided to achieve the wider vision of the Opportunity Area the Council will make a judgement at application stage.</p> <p>The office space is set out in the Local Plan Allocation. Further detail is provided regarding creative workspace in the background document, and this</p>
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	<p>Page 64 of the Draft SPD states that at least three 500sqm community spaces will be required depending on the number of homes delivered across the KCOA. It is not clear across the Draft SPD whether this 1,500sqm is on top of the required 2,000sqm of non-residential floorspace as page 50 suggests the community space should be included within the overall non-residential offer. This should be clarified.</p> <p>It is also not clear from the Draft SPD where the community spaces should be located (i.e. whether they should be clustered on one site or spread across the KCOA). The provision of 1,500sqm of community space at ground floor across the KCOA will take up a significant proportion of the available ground floor, reducing the ability to provide a range of non-residential uses, including retail, restaurants and cafes, and workspace. Finally, it is not clear whether there is an evidence base to support this 1,500sqm requirement; any requirement to provide community space should be based on identified local need and robust evidence. There appears to be no evidence to support this requirement.</p> <p>Page 65 of the Draft SPD seeks to ensure long term continuity for the Notting Hill Carnival. Ballymore and SSL support the Council’s ambition to retain the Carnival on site and are engaging with the Carnival operators to understand how this could work in practice, however, the SPD should recognise that it may be difficult to retain the Carnival on site during certain parts of the construction period and that flexibility must be allowed for this, while securing reasonable endeavours to allow the KCOA to remain as the starting point for the Carnival in the short and long term.</p> <p>6.1 Responding to context and setting</p> <p>Ballymore and SSL support the recognition on Page 68 that a ‘step change’ in scale and density will be required to deliver the required number of homes across the KCOA, while maintaining a design quality which reflects RBKC as a borough.</p> <p>Draft Policy CH2 currently states that development should respond to and</p>	<p>could include ‘office space’ in a variety of formats.</p> <p>Noted. The Local Plan allocates 10,000sqm of office floorspace at the site.</p> <p>The draft SPD suggests a range of different workspaces will be required to create a supportive ecosystems. As identified in the background workspace strategy creative industries can require lower rental costs. The SPD encourages developers to work with the Council to achieve supportive ecosystem on the site.</p>
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	<p>not cause unacceptable harm to the significance of surrounding heritage assets. Ballymore and SSL suggest that the wording of this policy should be amended to reflect the wording contained within the NPPF, in that development should not cause 'substantial harm' to the significance of surrounding heritage assets and development which causes 'less than substantial harm' to the significance of surrounding heritage assets should be outweighed by public benefits.</p> <p>The Views Study (Appendix 1 of the Draft SPD) at page 8 helpfully recognises that it may be appropriate to alter the selection of views for particular development proposals, in agreement with the Council. However, page 72 of the Draft SPD simply states that verified views from the identified locations 'must be submitted with planning applications'. It is recommended that this is amended to echo the flexibility set out in the Views Study text to allow slightly different view locations dependent on the final scheme, as long as these are first agreed with the Council.</p> <p>6.2 Height and massing</p> <p>Page 75 of the Draft SPD notes that the guidelines prescribed in regard to height and massing are indicative only and the final height and massing strategy should be informed by a clear site wide strategy. This approach is supported and it should be clear within the SPD that any guidance on height, massing or layout is indicative only and any further scheme will be assessed on its own merits.</p> <p>Nonetheless, Page 75 goes on to say that 'clusters of tall buildings will not be supported'. It is not clear from this what the intention is through this statement, as a 'cluster' typically refers to a number of towers which are read as forming an overall grouping and is generally considered to be a positive in design guidance. It is not clear whether this is what the Draft SPD is trying to prevent, or whether the intention is to prevent tall buildings in very close proximity to each other. If the intention is the latter, to ensure a positive relationship between any tall buildings and</p>	<p>The Local Plan states 'relocation and re-provision'</p> <p>As defined in the allocation, it is within the 2000sqm</p> <p>The SPD states clearly that any provision should be based on a community needs assessment. A location is not provided in the SPD as this should be based on the identified need and developed through the master planning process in conjunction with the community.</p> <p>The DIFS identifies the community floorspace requirement. However, developers should undertake a community needs assessment as part of any planning application.</p>
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	<p>prevent any environmental or amenity issues from having tall buildings too close to each other, then this would be supported. However, we would object to the SPD prohibiting any clustering of taller buildings if this can be demonstrated to be a suitable design approach which optimises housing delivery (including affordable housing), while providing a high-quality townscape and limiting the impact on surrounding heritage assets. It is also not clear why the Trellick Tower is identified as a maximum building height on page 75; this is unnecessarily prescriptive and could prevent a well-designed tall building coming forward for no reason other than it is taller than the Trellick Tower. The final height of any tall buildings within the KCOA should be assessed on their own merits, including design, environmental quality and heritage impacts, rather than a simplistic view of maximum height as currently drafted.</p> <p>6.3 Environmental and sustainable design</p> <p>Ballymore and SSL supports the Council’s ambitions to reduce carbon emissions and provide a green and sustainable development across the KCOA. SSL are committed to net zero by 2040 which aligns with the Council’s own ambition, including investing £1 billion over twenty years towards becoming Net Zero across their own operations by 2040. This £1 billion investment will be used to support seven commitments that focus on reducing carbon emissions, food waste, plastic packaging and water use and increasing recycling, biodiversity and healthy & sustainable lifestyles.</p> <p>Page 77 of the Draft SPD states that a transition plan will be required which identifies how developers will meet the target of net zero carbon by 2030. It is assumed that the net zero carbon set out in the Draft SPD is consistent with Policy SI2 of the London Plan which requires carbon emissions to be minimised as much as reasonably possible through on site measures in accordance with the energy hierarchy, but where it can be clearly demonstrated that the net zero carbon target cannot be fully</p>	<p>Noted. The SPD is clear that the long term continuity of the Notting Hill Carnival is the priority.</p> <p>The wording of CH2 has been amended to ensure alignment with the NPPF.</p> <p>The SPD wording has been amended to clarify that additional views can be included in any future submission.</p>
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	<p>achieved on site, any shortfall should be provided either through a cash in lieu contribution to the borough’s carbon offset fund or off-site. This should be clarified within the SPD.</p> <p>7.2 Affordable housing In addition to the comments provided above (in response to Section 5.1 ‘Live’), detailed comments from Gerald Eve on the Draft SPD in regard to the delivery of housing, including affordable housing, is included as an appendix to this response.</p> <p>7.3 Delivery of infrastructure Page 87 of the Draft SPD discusses the infrastructure requirements of the KCOA in accordance with the DIFS, with a table included on Page 88 which sets out the required financial contributions for each scenario. It should be clarified within the supporting text of this table that the values set out will need to be subject to further viability testing at the application stage and will need to be balanced against other elements of any redevelopment scheme, including affordable housing provision and density. It must be consistently recognised across the SPD that the lower capacity tested (3,500 homes) was not viable at 35% affordable housing with the identified infrastructure contributions. There therefore may have to be a trade-off between infrastructure, affordable housing and density which must be recognised. While this is noted earlier in the Draft SPD, Ballymore and SSL suggest that this is clearly set out again alongside this table for clarity.</p> <p>In regard to the delivery of the two bridges (across the railway to the south and canal to the north),page 89 of the Draft SPD states “Where an individual developer is relying upon the delivery of infrastructure on land it does not control, such as one of the bridge landing points, the council will require some certainty that the relevant elements of infrastructure will be delivered by the landowner/developer who controls the land on which that infrastructure has been identified to be located by this SPD.”</p>	<p>The height map is indicative only and the accompanying text has been amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan.</p>
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	<p>As set out above, Ballymore and SSL cannot support a Grampian condition which prevents commencement or occupation of all or part of the development until the bridges are delivered. However, we will ensure that the redevelopment scheme is not reliant on the delivery of either bridge to be successful. This will ensure that the KCOA delivers a successful masterplan and new community both before and after the bridges are delivered. As noted above, Ballymore and SSL are willing to secure a financial contribution towards the delivery of the bridge(s) and safeguarding the landing point on the Ballymore / SSL land for the railway bridge through a Section 106 Agreement as part of any planning permission to be granted. This is a fundamental point to ensuring the delivery of redevelopment on the Ballymore and SSL land and a Grampian condition or other restriction which delays development until the bridges have been delivered, and relies on third party land, could obstruct the redevelopment of the KCOA.</p> <p>Page 93 of the Draft SPD states that public realm areas are likely to be adopted by the Council. Ballymore are an established developer of large residential and mixed-use schemes across London and the UK and generally retain control of public open space and landscaped areas within their developments. Ballymore therefore have an experienced maintenance team who ensure the upkeep of public realm areas within their developments across London. It is therefore expected that Ballymore will retain control of the areas of public realm within their ownership rather than these spaces being adopted by the Council. Nonetheless, these spaces will be maintained to a high standard in perpetuity and Ballymore are happy for a management and maintenance plan to be secured by condition or legal agreement to ensure this is the case.</p> <p>Page 93 goes on to say that the first landowner to submit a planning application on the northern site and the southern site will be required to submit a site wide management and maintenance strategy for those parts</p>	<p>CH4 states that developments will be expected to apply the policies of the Development Plan in relation to carbon emissions. Further text is added to clarify the guidance set out in the Greening SPD.</p> <p>Noted.</p>
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	<p>of the public realm that will remain in private ownership. All landowners submitting planning applications subsequently in the northern or southern areas will then likely be required to adhere to the requirements of this submitted and approved strategy. While Ballymore and SSL agree to site wide principles in regard to the public realm and management / maintenance, it is considered unreasonable for all landowners to have to comply with a maintenance strategy which is submitted by the first landowner to submit a planning application. Instead, each landowner should have to submit a management and maintenance plan with their own planning application which adopts site wide principles, which have been agreed between landowners through the pre-application process.</p> <p>7.5 Engagement Ballymore and SSL support a wide and meaningful public engagement and are already working collaboratively with the Council, adjoining landowners and other key stakeholders (including the GLA) on the early masterplan ideas. We have also started public engagement through our website, the creation of a Community Viewpoint Group and a public webinar which was held virtually on 5th May 2020. We will continue to engage with local stakeholders, residents and the Council to ensure a collaborative approach which will extend through the planning process as well as through construction and post-development. A link to our community engagement website can be found here.</p> <p>Supporting Documents The following provides comments on the supporting documents and evidence base for the Draft SPD, as published online. Document 2 – Development Infrastructure Funding Study (DIFS) & Appendices</p> <p>Detailed comments on the DIFS have been prepared by Gerald Eve and are appended to this response letter. Overall, the DIFS concludes that at 40% affordable housing all three tested scenarios are unviable, however,</p>	<p>The table is labelled as ‘estimated costs’ and reference is made to applications being subject to viability testing throughout.</p> <p>Noted. Text has been amended to clarify the capacity testing in the DIFS.</p> <p>The Council disagree that a successful masterplan can be delivered without a bridge. Whilst we’ve provided flexibility in wording owing to land ownership issues the bridges are considered necessary to deliver a successful place. It is a key aspect to the delivery of the site.</p> <p>Noted, as above.</p>
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	<p>there is a potential for a surplus in the higher density scenarios (4,200 and 5,000 homes). Gerald Eve conclude that the methodology of the DIFS is appropriate and comprises a reasonable approach to promoting and guiding development on the KCOA. It should be noted, however, that the conclusions would be more robust if some of the key inputs in the DIF Study had been updated from the previous draft.</p> <p>Document 3 – Strategic Transport Study A Strategic Transport Report has been produced by RBKC consultants to support the SPD, and this has been validated by TfL’s Strategic Modelling team based on a 2041 reference case, including structural growth and development growth in the three SDP development scenarios. WSP have previously questioned the distribution assumptions, occupancy rates and trip rates which have been applied.</p> <p>The results are described in more detail in the report, but the overall conclusions on the impact of the development at KCOA on the highway network is as follows:</p> <ul style="list-style-type: none"> • There is some local diversion to minor links in the area, particularly in the AM peak where inbound flows to the development are higher driving higher delays on Ladbroke Grove. • There is no significant impact on delays beyond the immediate corridor, except for some minor increase in delays on some Harrow Rd junctions. • The new signal junction at Canal Way/ Ladbroke Grove will increase delay at the junction, but the junction works relatively well given the increase in traffic to/ from the site. <p>The strategic highway assessment has highlighted some isolated issues on the network particularly around the Ladbroke Grove junction and connecting junctions. These junctions are now being tested in a cordoned VISSIM micro-simulation traffic model. WSP have previously sought clarity</p>	<p>Noted. It is expected that this will be determined in the process of a planning application.</p> <p>Noted wording has been altered to clarify that site wide principles will need to be agreed between landowners through the pre-</p>
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	<p>from the Council about the general distribution of traffic on the network, and whether it is realistic to assume general increases in car traffic in the future. They also requested details of what assumptions had been made about the Ladbroke Grove/ Canal Way junction in the model and queried the removal of the left-hand turn at the Ladbroke Grove/ Kensal Road junction.</p> <p>The existing Sainsburys store operation is not easily modelled in strategic terms as the models are set up to identify origin and destination of trips based on strategic homes and employment factors. The Sainsbury store is a general attractor of traffic linked to food shopping, and linked to the petrol station (which is proposed to be removed).</p> <p>The overall conclusions on the impact of the development at KCOA on the public transport network is as follows:</p> <ul style="list-style-type: none"> • While there are rail and Underground lines with crowding issues in 2041 in the Base Minus, the new KCOA passengers do not have a significant impact on worsening crowding levels. • There is likely to be significant increase in bus passengers on services along Ladbroke Grove travelling Southbound in the AM and Northbound in the PM. • Ladbroke Grove Station is constrained with the additional passengers generated by KCOA potentially putting it under further strain. <p>The strategic public transport assessment has highlighted crowding issues in 2041, which are focused on the lines serving Ladbroke Grove and closer into central London. This level of impact is to be expected for all development within London and is largely not attributed to any specific developments. WSP question the distribution of trips on the Underground and suggest that more trips may use Kensal Green and Kensal Rise than illustrated in the model. WSP anticipate there will be a requirement to</p>	<p>application process.</p> <p>Noted.</p> <p>Noted. Flexibility was built into the DIFS in acknowledgement of its limitations without further detail.</p>
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	<p>assess capacity at Ladbroke Grove station, however there may only be limited capacity enhancements possible at the station due to its constrained nature which must be recognised by the Council and TfL. Nonetheless, the impact of the development will be linked to bus passengers travelling to Ladbroke Grove from the site, and these impacts may be spread across a number of services which will spread the impact at the station over different 15-minute periods. More specific impacts on local bus services may be felt and these are currently being discussed between WSP and TfL, however TfL's initial assessment illustrates there is sufficient capacity on bus services to support the development with some minor issues on some routes.</p> <p>Document 4 – Comparative Junction Study This document is dated May 2019 and is now considered out of date, as it responds to work previously undertaken by WSP which is now being superseded by the VISSIM model. WSP have not been asked to comment on this document or the audit previously undertaken and would be concerned if this report was relied upon to determine the outcome of the planning application in respect of impacts on the highway network. As stated in the strategic report, the suggested new junction will ultimately result in increased delays in traffic and bus movements on the Ladbroke Grove Corridor, and this will need to be balanced against the pedestrian and cycle benefits from the junction. The form of the junction is now being tested in VISSIM and we would request that flexibility is ingrained within the SPD and supporting transport documents to allow an alternative solution or amendments to the proposed junction system if there is a need to balance traffic flows or bus journey times on the network in order to achieve an acceptable development. The results will be reported in the Transport Assessment and supporting modelling reports.</p>	<p>Noted.</p> <p>New text has been added to clarify that a local network traffic model created for the Council in conjunction with TfL</p>
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	<p>It would have been helpful if the VISSIM modelling work which has been undertaken by RBKC and their consultants over the past 12-18 months was completed or able to be reported as part of the SPD consultation.</p> <p>Appendix 1 – Views Study</p> <p>The following comments have been provided by Peter Stewart Consultancy who are the townscape consultants advising Ballymore and SSL on the redevelopment of the KCOA:</p> <ul style="list-style-type: none"> • Page 9 of the Views Study document acknowledges that it is not a TVIA and does not take the same approach which is useful. However, it is still not clear how this document is seen as relating to future TVIA / heritage assessments and how it is expected to be used, beyond identifying viewpoint locations that should be considered. If its purpose is to simply identify the viewpoints then this should be clarified. The assessments this document makes, of ‘heritage significance’ and ‘townscape value’, are subjective and while not directly comparable to the EIA process of assessment, could still be seen as potentially setting up conflicts with the professional judgements of others in the future. • The use of the term ‘heritage significance’ in relation to views is potentially confusing – this is normally used to refer to the ‘significance’ of a heritage asset as defined in the NPPF and the accompanying definition of it seems to be taken from the NPPF. Its use in relation to views risks implying (incorrectly) that views are a heritage asset in their own right. Another term – ‘heritage interest’ or similar perhaps – might be better. <p>☐ We would suggest that the assessments of townscape value and ‘heritage significance’ would benefit from some further moderation – e.g. is view 15 really of high ‘heritage significance’ because the top of Trelick Tower is seen in the distance?</p> <p>☐ It would be useful for views descriptions and guidelines to relate more to the guidance on height and massing in the SPD – for example,</p>	<p>has been created to assess any forthcoming applications.</p> <p>Noted.</p>
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		<p>acknowledge in views from the south that tall buildings can be expected to be very visible if the heights map shown on p74 were to be followed.</p> <p>☐ Some of the view descriptions seem to refer to features which are not captured in the accompanying photographs (for example in the description for view 1, Canalside House is said to frame the view on the right-hand side but doesn't appear in the photo and for view 15 reference is made to large commercial sheds on the left-hand side of the view which aren't clearly visible – these might be visible in a higher res photos or in winter when the trees are not in leaf but it would be helpful to clarify).</p> <ul style="list-style-type: none"> • The document has a less prescriptive tone in places than previous iterations, but there are still instances of it using words such as 'should' and being very specific about the appearance of a future development in particular views. The introduction to the document would benefit from: • an explicit reference to the text within it being guidance only; and • a general paragraph acknowledging that any proposed development may not meet all the guidance for every view but could still be acceptable overall. • It's not clear whether the document is based on any computer model testing of an illustrative masterplan with some indicative massing. It would be useful to set this out if so. <p>Conclusion</p> <p>Overall, Ballymore and SSL support the aims and ambitions of the Draft SPD and appreciate the clarity that it seeks to bring in regard to what the Council expects to see within any forthcoming redevelopment of the KCOA.</p>	<p>Noted. As above, new text has been added to clarify that a local network traffic model created for the Council in conjunction with TFL has been created to assess any forthcoming applications.</p>
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	<p>The recognition within the Draft SPD that affordable housing must be balanced against overall density and housing delivery is strongly supported and this fine balance must be appreciated by all stakeholders. It is integral that the SPD is viable and deliverable and does not set unrealistic expectations for the redevelopment of the KCOA. We therefore request that further flexibility is enshrined into the Draft SPD to allow for alternative solutions to be brought forward through the design development process where it can be demonstrated that these are appropriate.</p> <p>We look forward to continuing to work with RBKC on the Draft SPD and emerging redevelopment proposals for the Kensal Canalside Opportunity Area.</p> <p>1 Introduction</p> <p>1.1 Gerald Eve (“GE”, “we”, “us” etc.) have been instructed by Ballymore to undertake a review of the Kensal Canalside Opportunity Area Supplementary Planning Document (“KCOA SPD”) and comment on its soundness as guidance on the application of Royal Borough of Kensington and Chelsea’s (“RBKC”, the “Council”) Local Plan policies, specifically with regard to the viability of the Ladbrooke Grove Canalside site (the “Site”).</p> <p>1.2 We have also been Instructed to comment on the evidence base that sits behind the KCOA SPD in the form of the Development Infrastructure Funding Study (“DIF Study”), as viability tests have been undertaken within this study that inform the KCOA SPD. The DIF Study has been undertaken by Carter Jonas (“CJ”), who are also to be reviewing any future viability assessments that we undertake for the Site (on behalf of landowners Ballymore and Sainsburys).</p> <p>1.3 We were previously provided with an earlier draft of the KCOA SPD in June 2020 (“June 2020 Draft KCOA SPD”), and an earlier draft of the DIF Study in June 2020 (“June 2020 Draft DIF Study”). In our review we will</p>	<p>The views study identifies that RBKC would like design teams to consider the selected views as part of their design development process. However, this should not be taken as a TVIA but as an initial consideration.</p> <p>The Views study sets out the meaning behind heritage significance identification in this document and its limitations.</p>
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	<p>comment if there are any material changes from these drafts to the final document, which we understand is published for consultation.</p> <p>2 DIFS Study: Changes from Previous Draft</p> <p>2.1 We have reviewed the differences in methodology and text between the June 2020 Draft DIF Study and the DIF Study.</p> <p>2.2 In general, we note that very little has changed between the documents. As such, we outline below the comments that we believe to be relevant in using it as evidence for the KCOA SPD.</p> <p>2.3 At paragraph 1.7, it states that the research for this document was carried out in the second half of 2019. It states that the inputs will therefore need to be reviewed as more information becomes available. As it is now almost two years from this date, it may be the case that CJ need to undertake this review, as some of the inputs may be out of date. However, in our experience, given the length of the Local Plan, it is not unusual to use slightly historic data for area wide studies, in the knowledge that individual site specific viability assessments will use fully up to date inputs.</p> <p>2.4 In terms of methodology, we believe the DIF Study is appropriate. At paragraph B.2, CJ state its compliance with the RICS Practice Statement on Viability Conduct and Reporting (May 2019). One point to mention however is that the DIF Study undertakes initial appraisals and then provides specific scenario analysis. Whilst if we had undertaken the study, we may have undertaken more detailed sensitivity analysis, we do not believe that this is an incorrect approach.</p> <p>2.5 We also note that since the publication of the DIF Study in February 2021, a new RICS Guidance Note has been published, titled 'Assessing Viability in Planning under the National Planning Policy Framework 2019 for England', which has been written to supersede the previous RICS Guidance Note Financial Viability in Planning (2012). Both the 2012 Guidance Note and the new 2021 Guidance Note provide guidance with</p>	<p>This is a high-level document that begins to identify locations for views that the Council would like to review as a part of any application.</p> <p>The height map is indicative only and the accompanying text has been amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan.</p> <p>Acknowledgement of seasons is given at the outset of the Views document and the description included is broad and provides the framework from which views should be taken. As stated, the description is more than just the view itself in the photo.</p> <p>Amendments to the text in the SPD further clarifies guidance that should be followed at planning application submission stage.</p>
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	<p>regard to viability studies for site-specific and area wide assessments. CJ have not explicitly referenced following the guidance of either document, however it appears they have broadly followed the principles.</p> <p>2.6 The main change that we have identified between the 2020 Draft and the DIF Study is in the way the results are presented. In the June 2020 Draft, two tables (5.3 and 5.4) were provided to demonstrate the funding gap at 30% and 35% affordable housing. In the DIF Study this is presented as one table (5.3) with a range between 25% and 35%. However, due to updates in the new London Plan, specifically the requirement for 50% affordable housing on public sector and/or industrial land, this has lead CJ to include such a scenario in respect of the North Pole Site.</p> <p>2.7 We believe that this is an appropriate update to the approach, but we note that in the DIF Study, CJ have also undertaken further sensitivity analysis, which analyses not including 50% affordable housing on the North Pole Site.</p> <p>2.8 As above, we would term this “scenario analysis”, but believe it an appropriate assessment to undertake.</p> <p>Conclusion on DIF Study Changes</p> <p>2.9 Following the new analysis and how it is set out in the DIF Study in comparison to the June 2020 Draft, we understand that the conclusions have not changed, which show that at 40% affordable housing all scenarios are unviable. However, in the higher density scenarios there is a potential for a surplus, but this is dependent on the scale of the upfront additional infrastructure (or affordable housing) funding.</p> <p>3 DIFS Study: Viability Assumptions</p> <p>3.1 We set out below comments on the viability assumptions that CJ have used within the DIF Study. These can be found in Appendix B of the document.</p> <p>3.2 At paragraph B.5 CJ state that the level of detail included in the DIF Study is less than what would be expected in an application for the Site.</p>	<p>The introduction to the SPD states that it is guidance.</p> <p>The SPD states that the views study will enable a wider assessment of development as part of any planning judgement.</p> <p>The document was reviewed following some indicative massing from the capacity scenarios.</p> <p>Noted. Flexibility has been built into the SPD to allow for applications to be determined appropriately using up to date assessments.</p>
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	<p>We agree with this statement, but believe that the methodology and approach are appropriate for an area wide assessment where a detailed scheme has not been designed yet.</p> <p>3.3 Paragraph B7 states that the assessment is at Q1 2020. As such, the inputs are potentially out of date. In our opinion, some of the inputs will have changed since this date, and as such there may be a potential difference in results to viability assessments undertaken with more recently acquired data.</p> <p>3.4 Paragraph B10 outlines that CJ have used minimum unit sizes from the London Plan, which we believe to be appropriate methodology. However, they only appreciate one variation of mix of person per number of bedrooms. Given the high-level assessment this is not incorrect, but more detail using different unit types could have been included.</p> <p>3.5 In terms of residential values, CJ have not updated their assessment from the 2020 Draft KCOA SPD and state that values are £950 per sq ft. As private residential values are one of the key inputs into viability assessments, in our opinion updating these would have made the DIF Study more robust.</p> <p>3.6 The commercial value inputs that CJ have assumed have also not been updated since the June 2020 Draft. We understand that these may have changed and general inputs such as rent-free incentives and terms may be different to a year ago, given changes in the markets.</p> <p>3.7 Construction costs have also not been updated, but their approach to using BCIS upper quartile with a slight premium appears appropriate as it is expected construction costs will be high. They may, however, potentially be slightly on the low side, given the likely need to undertake land remediation. Specific construction cost plans will be reviewed as part of a site-specific assessment supporting a planning application in any case.</p> <p>3.8 10% external costs are generally considered to be an industry standard assumption and are reasonable.</p>	<p>Noted.</p>
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	<p>3.9 Currently no cost or value has been applied to the car parking in the scheme, which is appropriate in our opinion.</p> <p>3.10 In terms of Benchmark Land Value, it is not clear what the approach CJ have taken. It states what the previous assessments assumed, however it does not explicitly state what they have assumed in this study.</p> <p>3.11 We assume that no value has been attributed to the Sainsbury's store in either the calculation of BLV or gross development value (GDV), as per the 2016 DIFS, based on the fact that the landowner is getting a "like for like" replacement. This approach is not incorrect in our opinion, however, in our experience of working on viability assessments and planning appeals for schemes involving the inclusion of superstores, they should be accounted for within both the calculation of BLV and the GDV of the scheme. This is a more realistic approach to discounting a large part of the project from the calculations.</p> <p>3.12 The notable appeal decision where the inclusion of a Sainsbury's store within both the BLV and viability appraisal was in Whitechapel in 2018, with appeal reference APP/E5900/W/17/3190685.</p> <p>3.13 CJ have applied a 20% premium to their calculation of EUV, which may be appropriate, however we would recommend undertaking land comparable analysis to support any premium applied, in accordance with the RICS Guidance Note (2021).</p> <p>3.14 We consider that the "Other Development Costs" appear appropriate, however these will be reviewed as part of the scheme-specific viability assessment. For the purposes of the DIFS it appears CJ have used standardised inputs as per NPG.</p> <p>3.15 The "trajectory" of the schemes has not been amended from the June 2020 Draft, which appears to be reasonable for the assumptions made for the number of units within each parcel of land. The programme runs from 2022 to 2031, which is similar to the draft Construction</p>	<p>Noted, site specific viability is expected at application that is up to date at the time of submission.</p> <p>Noted.</p> <p>Noted</p>
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	<p>Management Plan we have been provided with. This will have to be re-assessed when the total number of units and a scheme is finalised.</p> <p>3.16 We do note that the disposal assumptions have also not changed since the June 2020 Draft, and as such are potentially overly optimistic.</p> <p>Conclusions on Viability Assumptions Appendix</p> <p>3.17 The conclusions of this viability section, as outlined above are set out differently to the June 2020 draft, showing a range of 25%-35% affordable housing and the deficit or surplus as a result, rather than individual levels of affordable housing between 20% and 35%. This is shown in Table B.8, which appears to feed into Table 4.2 of the main report, however, the base appraisals that feed into Table 4.1 are not shown in Appendix B. Table 4.1 appears to be the basis of the conclusions in the KCOA SPD and as such it is unclear why they are not referenced in this appendix that addresses viability assessments.</p> <p>3.18 In general, the viability assessment appendix within the DIF Study are somewhat unclear, which would be rectified if the appraisals were provided. As outlined above, there are very limited changes from the June 2020 draft and this appendix is no exception.</p> <p>4 Application and Changes to the SPD</p> <p>4.1 Similarly, to the DIF Study, there are limited changes to the KCOA SPD to the previous draft in relation to viability. This is to be expected, given that the DIF Study forms the evidence base that sits behind the KCOA SPD.</p> <p>4.2 However, in the June 2020 KCOA SPD, Section C – Delivery had not been written and / or provided. This section summarises what the KCOA SPD says in relation to site capacity, viability, and affordable housing, providing our comment on its soundness in light of our review of the DIF</p>	<p>Noted.</p> <p>Noted and acknowledged.</p>
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	<p>4.13 As outlined above, this section was not included in the June 2020 Draft KCOA SPD, but is now the concluding section within the KCOA SPD. We summarise the key points below.</p> <p>4.14 Paragraph 7.1 sets out the phasing of the delivery of the sites outlining that the Site will be brought forward first with the Sainsbury’s store being built early to ensure continuous trading. The National Grid, St William, RBKC Land (Canalside House) and the DfT Land to the south will come forward later.</p> <p>4.15 In terms of design, the KCOA SPD outlines that the design code will allow developers to secure agreed design outcomes and maintain viability.</p> <p>4.16 In paragraph 7.2 it addresses affordable housing, stating that the delivery of affordable housing is a key priority. It further states that the DIF Study conclusions show that “in order to provide a viable scheme that can deliver good levels of affordable housing, the Site would need to be delivered at a high density” (page 86).</p> <p>4.17 As well as supporting higher density schemes on the Site, the Council will also look at the possibility of funding from other sources as a result of the DIF Study. As outlined above, we believe this is appropriate given the results of the DIF Study.</p> <p>4.18 Developers are expected to work with the Council in drafting S106 Agreements, inclusive of the timing at which affordable housing is delivered in any scheme on the Site.</p> <p>4.19 Paragraph 7.3 outlines the delivery of infrastructure stating that whilst the DIF Study provides an assessment, a Site-specific infrastructure delivery strategy will be required to accompany any individual planning application.</p> <p>4.20 The Site is exempt from the Borough’s CIL charge.</p> <p>4.21 It outlines that the delivery of an Elizabeth Line station (Crossrail) is not feasible and no further testing is anticipated.</p>	<p>The appendix shows basic viability assumptions. The main report highlights the capacity scenarios.</p> <p>The DIFS is a high-level document that relies upon a number of estimates and assumptions at the time of undertaking the report. Acknowledgement is given throughout that future applications will be subject to viability assessment.</p>
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	<p>4.22 This section also outlines the junctions, bridges, and bus links. In particular the cycle / pedestrian bridge across the railway is essential for improving the integration of the Site with the wider area and it is expected that a developer will have to engage with all stakeholders to ensure it is brought forward in an early phase and any maintenance arranged in the S106.</p> <p>4.23 Developers are expected to work closely with TfL to deliver the appropriate junctions and bus links.</p> <p>4.24 The KCOA SPD also outlines the requirements and delivery method for schools and healthcare, public realm, emergency services and energy with the key message being that any developer is expected to undertake early engagement with stakeholders and evidence this in masterplans for demonstrating the delivery of each.</p> <p>4.25 We consider that the inclusion of this section offers a sound approach to promoting development on the site and it should encourage good practice in terms of stakeholder engagement.</p> <p>5 Conclusions</p> <p>5.1 The DIF Study in general has not materially changed from the June 2020 Draft, however modifications have been made to the assessments in terms of presentation and sensitivity analysis. The conclusions do not appear to have changed, however.</p> <p>5.2 We outline at paragraph 4.12 above that the KCOA SPD states that 35% affordable housing should be the target for the Site, subject to viability.</p> <p>5.3 The KCOA SPD also appears to promote a higher density scheme on the Site, which may have a positive impact on viability. However, we highlight the conflict that this may have with the height of the buildings within a scheme on the site.</p> <p>5.4 In general, we believe that the KCOA SPD is generally sound and comprises a reasonable approach to promoting and guiding development</p>	<p>Noted. The height text has been amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan.</p>
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		<p>on the Site. It should be noted, however, that the conclusions would be more robust if some of the key inputs in the DIF Study had been updated from the previous draft.</p>	<p>Noted.</p> <p>Noted the text has been amended to align with the DIFS.</p>
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			Noted.
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			<p>Noted.</p> <p>Noted, as above, the height text has been amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan.</p>
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			Noted.
38	Canal & River Trust	<p>Thank you for your consultation on the above SPD.</p> <p>We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.</p> <p>The Grand Union Canal is a key part of the Blue Ribbon Network in Kensington and Chelsea. We own and manage the Grand Union Canal and its towpath.</p> <p>The canal and its towpath, and the adjoining basins, provide important areas for recreation, biodiversity, sustainable transport (with a related air quality benefit), business, tourism, a focal point for cultural activities and, increasingly, a space where Londoners are choosing to live. They can also provide a resource that can heat and cool buildings, provide a corridor in which new utilities infrastructure can be installed, and sustainably drain surface water away from new developments. There are opportunities to improve the contribution that the waterways make to the sustainability and attractiveness of Kensal as a place to live, work and visit.</p> <p>Having reviewed the draft Kensal Canalside SPD, we have the following general comments:</p> <p>We note that most of the Trust previous comments have been taken into account within the SPD, and we are pleased to note that the canal is</p>	Noted.

	<p>considered throughout (except for a few areas, such as views and the design code, which we comment further on below).</p> <p>Page 27 New and improved walking & cycling connections We are pleased to note the incorporation of a direct parallel route through the north of the development to provide an alternative to the towpath for cyclists. It is unfortunate that there is no way to connect this all the way through the development, and it will be a challenge to make this more direct than the towpath (for anyone already on the towpath) but we appreciate that this will perhaps offset some of the additional demand from the new development itself. The connection to Kensal Green tube as a further alternative route is also likely to be a key part of this to address capacity issues.</p> <p>We are also pleased to note that a route to the south of the railway is still shown, which will help people joining further south, however we understood from recent conversations with OPDC that it was not going to be possible to connect this route through the Network Rail land.</p> <p>Page 30 - Accessing and Bridging the Canal 'Development must seek to deliver: CO6 – New Connections and improved access to the towpath with a pedestrian bridge over the canal' We have no further comment to make on this section, and await further detail of the proposed bridge before we can consider if this would be acceptable.</p> <p>There is no specific reference to lighting provision, but we would also want to look at this closely to ensure there is no adverse impact on biodiversity, and that any provision was part of a consistent lighting strategy, to ensure pedestrians weren't led into unlit areas.</p>	<p>Noted</p> <p>The SPD sets out the vision for the area and the opportunities for connectivity. Land ownership issues and phasing will need to be overcome to provide access to some areas of land. Land to the South is owned by Department for Transport and is being brought forward later in the plan period. Text has been amended to clarify this.</p> <p>Noted</p>
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	<p>Page 31 Blue spaces and the positive effect on mental health The Canal & River Trust is a wellbeing charity and we therefore agree that access to waterways is key to supporting health and wellbeing for our local communities: https://canalrivertrust.org.uk/enjoy-the-waterways Further information is available on our website, and in our Waterways & Wellbeing, First outcomes report 2017: https://canalrivertrust.org.uk/news-and-views/features/wellbeing-on-your-doorstep https://canalrivertrust.org.uk/refresh/media/thumbnail/33802-canal-and-river-trust-outcomes-report-waterways-and-wellbeing-full-report.pdf</p> <p>However, the proposal to create a new bridge crossing will need to be developed with careful consideration of its impact on the setting of the canal and of the configuration of its landings on each bank. Provision of access between the bridge and the towpath, in a way that preserves the utility and legibility of the towpath, represents a key challenge.</p> <p>Page 33 - Access to public transport We are pleased to note the reference for using the canal for public transport and for movement of construction materials and waste, which is in accordance with Policy SI 15 of the London Plan.</p> <p>Page 38 - Public Realm Strategy This section mentions the green/blue network in terms of biodiversity and SUDS. The canal may be able to accept some surface water drainage, but this will need to be fully assessed by, and formally agreed with, the Trusts Utilities team. Access to blue space for wellbeing (as described in our comments to page 31, above) should probably be specifically mentioned in this section.</p>	<p>Reference to care with lighting provision in sensitive locations has been added to the text for clarification.</p> <p>Noted. The importance of this has been included in the text.</p> <p>Noted – new wording has been added to ensure the bridge takes account of its setting The SPD acknowledges the challenges with bringing forward a bridge in this location.</p> <p>Noted</p>
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	<p>Lighting is mentioned here, with reference to the Design Code, but canalside lighting requirements are not mentioned. Given the sensitivity of the canal environment, this should be detailed</p> <p>Page 39 - Streets This section mentions electric charging for cars, and we would also like the SPD to refer to eco-mooring charging points for boats to reduce engine use (more detail at comments on page 77, below).</p> <p>Page 43 - Public Spaces Improvements to the towpath developed through a canal strategy, incorporating significant elements of high-quality green space for recreational use and wildlife importance. The strategy will need to strike the right Ensure the bridge landing points are overlooked, legible and safe mixed-</p> <p>We are pleased to note these requirements.</p> <p>Page 46 Spaces We note that the feedback highlights the importance of the canal for consultation respondents: 'You said: More could be done to maximise the use of the canal and towpath and the development should look to include the waterway identity.' 'We did: We are requiring improvements to the towpath for both recreational use and wildlife ensuring the increased service provision for canal boat users. The new wharf will become a hub with flexible space for people to interact with the water.' We are pleased to note this is highlighted throughout the document.</p> <p>Page 48 Spaces</p>	<p>Noted</p> <p>The text has been amended to include reference to these benefits.</p> <p>As above</p> <p>Reference has been added t the text on eco-mooring charging points.</p> <p>Noted</p>
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	<p>1. Canal & towpath This mostly reflects the Trust feedback, apart from not including reference to our requirement for improved moorings and associated infrastructure (including eco-moorings). Page 49</p> <p>5. New wharf and Superstore entrance These ideas sound promising, subject to details. Key concerns for the Trust would be the bridging of the basin, retention of the existing dock bridge, the provision of an accessible alternative route avoiding the bridge, and better highlighting the canal heritage. There are also opportunities for waterside/waterspace biodiversity enhancements. There should also be reference to the provision for eco moorings as part of the available services (described in more detail at page 77, below).</p> <p>We are also pleased to note the reference to support services this might be an opportunity to provide a boat yard, to support canal users and encourage more boat traffic through the area.</p> <p>6. Character Page 68 - Design The integrity, legibility and fabric of the historic infrastructure of the canal in all its components need to be preserved and, as appropriate, enhanced. Within 'Kensal Canalside' this composite heritage asset includes the waterway walls, the towpath, the basin and the side-bridge taking the towpath over the basin entrance, as well as remnants, such as boundary walls, of former industrial premises adjacent to the towpath. The design of any proposed development to the immediate south of the canal should reflect, and respond to, the high amenity and heritage value of the waterway corridor.</p>	<p>Noted</p> <p>Wording has been added to the text to acknowledge this opportunity.</p> <p>Noted. All new connections are required to be inclusively designed and accessible to all and as such any new basin should ensure an alternative route.</p> <p>Noted.</p>
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		<p>Page 75 - Height & massing We are pleased that overshadowing is covered here, and that the SPD also supports lower building heights at the canalside (although it is slightly difficult to interpret the indicative height graphic very specifically). The shading caused by tall canalside buildings can adversely impact biodiversity by affecting the potential for plankton to photosynthesise, thus impacting on their numbers and the rest of the aquatic ecosystem. Overshadowing can also adversely impact on the amenity of the canal environment, for boaters and towpath users.</p> <p>Page 77 Environmental & Sustainable Design Canalside development should also seek to provide eco-moorings, therefore being less reliant on engines. Overshadowing of the canal by tall canalside development can adversely affect the effectiveness of solar panels that some boats use for power, and require them to run their engines more, so it would be beneficial for the development if a more eco-friendly solution can be incorporated. Canal water can also be used for sustainable heating and cooling of canalside buildings, and the SPD should encourage developers to have early discussion with the Trusts Water</p> <p>Development team.</p> <p>Page 81 - Character Areas Area 1 We are pleased to note the requirement for active frontages to the waterside. The absence of reference to the canal in point 10 (historical reference) is notable, and we would suggest this is added (though we note that it is included elsewhere in the document in wider terms).</p>	<p>Noted. CH1 references the importance of local context in the design, layout, and architectural quality of buildings within the masterplan. Additional text has also been included that references the importance of undesignated heritage assets.</p> <p>Noted. The height map is indicative only and the accompanying text has been amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan.</p>
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	<p>Area 2 As above, we request that reference to the historic interest of the canal be added here.</p> <p>Delivery of infrastructure Page 93 - Public Realm ‘The development should ensure delivery of improvements to the towpath in conjunction with the Canal and River Trust’ We are pleased to note this inclusion, and within the Transport section of the table of costs.</p> <p>Page 94 - Construction traffic As on page 33, the use the canal for movement of construction materials and waste should be included, in accordance with Policy SI 15 of the London Plan.</p> <p>Page 95 - Engagement The Canal & River Trust should be listed here.</p> <p>Supporting documents Development Infrastructure Funding Study</p> <p>Page 16 - Table of Key Costs This indicates nearly £9m for the Grand Union Canal projects. The Appendix has more detail, and under Transport projects we note the following: Grand Union Canal/W.01 (essential mitigation):</p> <ul style="list-style-type: none"> • £2.3m estimated cost • <i>Improved pedestrian route along the Grand Union Canal towpath adjacent to the development. Towpath could be shared with cyclists</i> 	<p>Noted and included within the text of the Spaces section.</p> <p>Additional text has been included that references this opportunity.</p> <p>Noted and reference included elsewhere in the SPD.</p> <p>Specific reference has been added elsewhere to undesignated heritage assets with strong links to the canal highlighted here. CH2 has been amended to ensure the text aligns the</p>
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		<p><i>depending on the wider suitability of the route (tbc). The scheme would provide:</i></p> <ul style="list-style-type: none"> - 5m wide towpath; and - sealed gravel surfacing. <p>We would query the requirement for 5m wide surfacing, which would likely remove any opportunity for biodiversity. We would need to see more detail on the form of the development and modelled towpath usage before we could assess if this was appropriate.</p> <p>We have had recent contact from RBKC Environment team to explore some biodiversity projects along the back of the towpath, which would potentially be a meanwhile use. How this fits with the landscaping strategy for the final development will need some more discussion.</p> <p>Grand Union Canal/W.02 (desirable)</p> <ul style="list-style-type: none"> • £6.4m estimated cost • Improved pedestrian route along the Grand Union Canal towpath between the site (Ladbroke Grove road bridge) and Paddington Station. <p>Measures to be confirmed but could include resurfacing and widening of the towpath where achievable. See walking plan for extents of route to be improved.</p> <p>We are pleased to note the inclusion of the Grand Union Canal towpath here, which we consider essential to the successful delivery of this scheme.</p> <p>Kensal Canalside and North Pole London Signs/W.10 (critical enabling)</p> <ul style="list-style-type: none"> • Provide Legible London signs as follows: <ul style="list-style-type: none"> - up to 4 signs within Kensal Canalside - up to 2 signs with North Pole 	<p>SPD with the NPPF position on heritage.</p> <p>Noted</p> <p>Noted sufficiently at page 33. Any CTMP should ensure this opportunity is investigated as such.</p> <p>Text added to include CRT.</p>
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		<p>We look forward to seeing further detail of this, as more wayfinding information may also be required, including key connections with the canal and bridges.</p> <p>Transport modelling study This document estimates growth of around 36-39,000 people (7-11,000 resulting from the development) to 2041, and around 40,000 daily active travel trips. There doesn't appear to be any assessment of the capacity of the canal towpath for a proportion of these trips, which would be useful to understand. Journeys towards Paddington are expected, but it would also be helpful to fully understand the likely impact on the towpath to the east of the development as well as west.</p> <p>Views study This includes very few views from the canal or the dock bridge, which is surprising. There is only one near view (looking directly at Ladbroke Grove Bridge) and whilst there are some distant views, we feel there should be more consideration of the direct impact on the Grand Union Canal between Ladbroke Grove and the gasholder.</p> <p>Design code The design code note appears to outline a code to be written by the developers. However, there is no reference to the canal or how design should consider the canal, which should be explicitly stated, as is outlined in the SPD document, including additional reference to the historical elements of the canal environment.</p> <p>I hope these comments are helpful. Please do not hesitate to contact me with any queries you may have.</p>	<p>Noted, these are estimated costs to understand the high level viability constraints of the site. Exact proposals are expected to come forward at application stage and should be developed as stated in the SPD in conjunction with the Canal and River Trust.</p> <p>Noted.</p> <p>Noted.</p>
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			<p>Noted.</p> <p>Noted. Any future application should ensure active travel plans are included in a transport study.</p> <p>Noted. The SPD has been amended to ensure additional views can be agreed with the Council at application stage. It is also noted that the canal is most often experienced kinetically as you walk along it. The views study highlights the importance of this and identifies that a single view along it is no replacement.</p> <p>The Design code sets out very high level themes. Each of the thematic layers relates to an SPD development framework section of which the canal sits in all. As such specific mention is not considered to be justified.</p>
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39	DFT	<p>1.1 On behalf of the Department of Transport (the “DFT”), Quod is instructed to submit representations to the Royal Borough of Kensington and Chelsea (the “Council”) in respect of the recently published consultation document, the Draft Kensal Canalside Supplementary Planning Document (the “SPD”).</p> <p>1.2 The DFT welcomes the publication of the SPD for consultation, and the opportunity to engage with the Council. The DFT has significant land interests within the SPD area which can contribute to the objectives of the SPD. DFT has engaged with the Council over a significant period to better understand the aspirations for growth and renewal of this significant brownfield site.</p> <p>1.3 The SPD provides guidance for the Kensal Canalside Opportunity Area, a strategic development allocation defined by the London Plan and Council’s Local Plan. The SPD performs a strategic role, of great significance. We consider that the broad tests of soundness (NPPF paragraph 35) should be applied to the SPD given this significance.</p> <p>1.4 The deliverability of the SPD also carries significant weight due to the paucity of housing delivery in the Royal Borough. The Council’s Housing Delivery Test results (2020) evidences that the Borough is only delivering 49% of its minimum housing requirement. This results in the presumption in favour of sustainable development being applied to the Borough. As Kensal Canalside represents the last major brownfield development site in the Borough, it is important that this development opportunity is optimised to help meet the Council’s housing needs, which are significant.</p>	

		<p>1.5 The evidence base to the SPD demonstrates that the Opportunity Area will need to deliver at least 5,000 homes if it is to viably contribute towards the Council’s affordable housing and infrastructure objectives. Additional funding, and/or a flexible approach to affordable provision, housing tenure and housing mix will be required to help address the viability challenges and deliver the maximum reasonable amount of affordable housing.</p> <p>1.6 To ensure a robust and deliverable SPD, DFT suggests that all infrastructure costs are accounted for in the SPD, and reasonable assumptions undertaken, to provide a transparent understanding of the challenges facing delivery. This will help inform the wider public benefits to be derived from the site, the level of development required to deliver these benefits and/or the additional funding required to support the SPD objectives.</p> <p>1.7 A transparent approach is particularly important in respect of the Development Infrastructure Funding Study (the “DIFS”). The DIFS does not yet include adjusted social rent values and deliverable net: gross ratios, and excludes costs related to improvements to underground services and Ladbroke Grove station, albeit the works are included as infrastructure items within the SPD.</p> <p>1.8 DFT supports the Council’s development ambitions at Kensal Canalside but believes that further amendments are required to ensure that the SPD is deliverable.</p> <p>2 Role of SPD</p>	<p>Noted.</p>
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	<p>2.1 The SPD provides guidance for the Kensal Canalside Opportunity Area, a strategic development allocation defined by the London Plan and Council’s Local Plan. London Plan Policy SD1 Opportunity Areas states that the Mayor will set out a strategy to realise growth.</p> <p>DFT Representation 1: It is important that the Mayor of London is actively engaged in the production of the SPD. DFT would welcome a copy of the Mayor’s representations once received.</p> <p>2.2 Due to the strategic importance of Kensal Canalside to the Council in meeting its housing needs, we consider that the tests of soundness (NPPF paragraph 35) should be applied to the SPD.</p> <p>2.3 Plans are ‘sound’ if they are (a) positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; (b) Justified – taking into account the reasonable alternatives, and based on proportionate evidence; (c) Effective – deliverable over the plan period; and (d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.</p> <p>2.4 There is a concern that the objectively assessed housing needs of the Council have not been fully considered in preparing the SPD, and that the updated housing needs of the Borough, which are significant, have not explicitly informed the objectives of the SPD.</p> <p>3 Housing</p> <p>3.1 The Council’s Housing Delivery Test 2020 evidence the delivery of an average 270 homes per year in the Royal Borough over the last 3 years. This is 49% of the minimum number of homes required and evidences a</p>	<p>The GLA have been continuously engaged in the preparation of the SPD. All representations are included in this schedule.</p>
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	<p>significant shortfall in housing delivery. The objectively assessed needs for the Council are significant and are not yet being met by the Council.</p> <p>DFT Representation 2: DFT would welcome further clarification on the Council’s objectively assessed housing needs and how these have informed the SPD objectives</p> <p>3.2 The Council’s adopted Local Plan (2019) Site Allocation CA1: Kensal Canalside Opportunity Area recognises that Kensal Canalside is the last remaining large brownfield site in the borough. There is an obligation on the Council and Mayor of London to optimise this development opportunity and ensure it contributes significantly to the housing needs of the Borough. We note that the land use requirement for 3,500 homes set out within Site Allocation CA1 is a minimum.</p> <p>3.3 London Plan SD1 requires Opportunity Areas to maximise the delivery of affordable housing; create mixed and inclusive communities; create employment opportunities and housing choice for Londoners; take appropriate measures to deal with contamination; deliver infrastructure; and identify public investment and intervention to achieve the growth potential. It is our opinion therefore that the SPD must contain a sound and deliverable set of policies, whilst meeting the minimum objectively assessed needs for the borough.</p> <p>3.4 The evidence base to the SPD demonstrates that the objectives can be positively supported, whilst recognising the role of heritage in place-making. Affordable Housing</p> <p>3.5 The DFT support the SPD’s recognition (1.7, page 16) that the scenario testing clearly evidences the need to deliver above the minimum 3,500</p>	<p>The Local Plan and the Community Housing SPD outline the housing needs of the borough. The SPD builds on the allocation as set out in the Local Plan and confirmed a high density high quality development will be acceptable to deliver the housing need of the borough.</p>
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		<p>home allocation. DFT is however concerned at the disconnect between the extensive viability evidence presented in the DIFS and the policies set out within the SPD (in particular LWV1).</p> <p>3.6 Based on the DIFS evidence (Table 5.3) the policy requirement of 35/50% affordable homes on private/public land would result in a deficit of £161m at 3,500 homes and £119m at 5,000 homes. The 35/50% policy requirement is therefore clearly evidenced to be extremely challenging.</p> <p>3.7 The DIFS evidence (paragraph 4.18 to 4.43) explores a range of sources to fund the deficit, most of which are concluded not to be feasible and none of which has any certainty.</p> <p>3.8 The SPD approach should comply with the National Planning Policy Framework (the “NPPF”) and the National Planning Practice Guidance (the “NPPG”), both of which seek to minimise the need for application stage viability negotiations, instead requiring robust viability testing at plan making stage and the setting of viable affordable housing requirements based on this. The policy requirement at paragraph 57 of the NPPF is set out in more detail in the NPPG:</p> <p>Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage. (Paragraph: 002 Reference ID: 10-002-20190509).</p> <p>DFT Representation 3: There is a clear public benefit to delivering the objectives of the SPD, and therefore rectification of the current and sustained deficit in housing supply by the Council should comprise the backbone of this SPD</p>	
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	<p>DFT Representation 4: We suggest that the SPD is more transparent in its conclusions and proposes the higher growth scenario (5,000 homes) as the sound development proposal within the SPD.</p> <p>DFT Representation 5: Policy LWV1 and associated parts of the SPD should be amended to reflect the viable level of affordable homes based on the DIFS evidence (this would appear to be c.20%), notwithstanding the wider ambitions of public sector bodies to achieve London Plan affordable targets on public land. This will ensure the SPD is compliant with the NPPF and enable timely development of the site, avoiding</p> <p>DFT Representation 6: Page 55 of the SPD which states that “the site becomes viable at the larger scenarios of 4200 homes and 5000 homes as there is a surplus.” should be amended as the DIFS evidence (Table 5.3) indicates a £119m deficit at 5,000 homes with the affordable housing requirement proposed in the SPD.</p> <p>3.9 In addition to the general principles above, DFT would also note specific areas where the DIFS evidence is not aligned to market evidence:</p> <ul style="list-style-type: none"> • The efficiency assumption of 80% net to gross is not achievable at any of the modelled densities. Comparable schemes typically achieve 70-75% net to gross, meaning that the estimated build costs in the DIFS are £80m to £190m less than an achievable cost. • The value of Social Rent homes at £200/ft² is in excess of that which a Registered Provider would be able to pay for this tenure (we would query whether higher Affordable Rents have been modelled). Adopting a more appropriate figure of £150/ft² would result in a reduction in revenue of £40m. 	<p>Noted. The SPD is drafted to ensure the delivery of much needed homes in the borough.</p> <p>Noted. The SPD sets out the Council’s approach to ensuring the optimum delivery of high-quality affordable homes given the housing need of the Borough. However, this must be balanced against other constraints to ensure that the full range of SPD objectives are achieved.</p> <p>The wider text provides additional necessary context. The SPD is clear that any forthcoming application will be subject to a viability assessment.</p> <p>Amendments have been made to clarify the DIFS findings.</p>
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	<p>3.10 The Mayor’s Affordable Housing SPD (paragraph 2.80) recognises that Opportunity Areas are key sources of housing supply in London. They are, by their nature, complex to bring forward and often require significant investment in infrastructure. They are also of a scale that can create fundamentally new places and communities. Significant research and an in-depth understanding of the area, its strengths and weaknesses, and how to deliver a successful place underpin the development of an Opportunity Area Planning Framework. Paragraph 2.84 suggests that LPAs may wish to apply a localised affordable housing threshold for the FastTrack Route or fixed affordable housing requirements that maximises affordable housing delivery.</p> <p>DFT Representation 7: The DFT would like to understand if a localised affordable housing threshold for the FastTrack Route has been considered by the Council.</p> <p>DFT Representation 8: The DIFS evidence should be amended to reflect realistic inputs as above and the outputs amended accordingly.</p> <p>3.11 DFT support LWV1 (page 52) which recognises that the affordable tenure requirements will be subject to viability.</p> <p>DFT Representation 9: It is proposed that the Council recognise that, for the purposes of the London Plan Threshold Approach (Policy H5 and H6), the remaining 40 per cent to be determined by the borough will be informed by the viability of the development and the need to incentivise delivery.</p> <p>DFT Representation 10: For the purposes of the London Plan Threshold Approach (Policy H5 and H6), the SPD (5.1 Live page 52) should refer to</p>	<p>The Council do not think it would be appropriate to lower the threshold here.</p> <p>The limitations of the DIFs are identified throughout and viability</p>
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the measurement of affordable housing by habitable room, rather than floorspace.

DFT Representation 11: The SPD (5.1 Live page 55) states that Kensal Canalside should aim to achieve the affordable housing tenure ratio of 70% social rent with the remaining 30% being intermediate. Given the recognised the viability challenges, we suggest that the SPD is more objective about its delivery aspirations and should at least propose the default tenure split of 50:50 as per Local Plan Policy CH2 (b), recognising that flexibility will be required to incentivise delivery. The setting of the lowest London Living Rent levels in the borough should be omitted from this SPD as they have not been viability tested, and would not represent a viable alternative.

DFT Representation 12: Affordable Housing (page 86) suggests that the need to provide the infrastructure set out in the SPD means that the only flexibility for the viability of the site is the number of homes delivered and the percentage of affordable housing. DFT believes that flexibility exists in respect of phasing, affordable housing tenure and housing mix. References to these items should be included in the text.

Housing Mix

4.1 Page 55 of the SPD indicates that that the size of homes that are built at Kensal Canalside meets the needs of the community. A table is included which provides a housing mix for market and affordable homes and this table is replicated below.

Housing mix %	Affordable Homes	Market Homes
1-2 beds	70%	50%
3-4+ beds	30%	50%

assessments will be required with any forthcoming applications.

Noted

Both are required for any future assessment as the Council requires floorspace while due to London Plan requirement we now also require habitable rooms.

[This table has been removed and text amended accordingly.](#)

	<p>4.2 There is no up to date evidence to support this mix of housing within the SPD, and the viability testing of the mix suggests that it has delivery challenges. The Strategic Housing Market Assessment evidence base is over 5 years old and is a general assessment of the whole Borough, which does not take into account the unique characteristics and aspirations for the SPD. The mix is more onerous than adopted Local Plan Policy CH3: Housing Size Mix and Standards which requires new residential developments to include a mix of types and sizes of homes to reflect the varying needs of the borough, taking into account the characteristics of the site, and current evidence in relation to housing need. For these reasons the table should be omitted, or subject to a qualification that it is an indicative mix subject to detailed assessment at planning application stage.</p> <p>5 Delivery & Flexibility</p> <p>5.1 Following our review of the evidence base to the SPD, it is apparent that the SPD must deliver at least 5,000 homes to be sound, achieve the Opportunity Area objectives and meet the infrastructure requirements identified. Even then, the SPD remains reliant on public finance to help meet the development economic shortfall. It is evident that given the challenging viability assessment, changes will occur to the strategic assumptions in the DIFS. Flexibility will therefore comprise an integral part of the SPD.</p> <p>5.2 To ensure the best opportunity for delivery, and compliance with Paragraph 11 of the NPPF which requires flexibility in plan making to respond to change, the SPD requires flexibility.</p> <p>Flexibility should be interwoven throughout the SPD, particularly in respect of affordable housing provision; the appropriate affordable tenure split; housing mix; and massing subject to site specific analysis. The phased timing of infrastructure provision will also need to be considered</p>	<p>Wording amended to clarify the broader flexibility.</p>
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	<p>flexibility as well as the availability of funding mechanisms, grant and financial contributions.</p> <p>5.3 At the recent Tower Hamlets Local Plan Review, the local plan inspector amended Policy D.SG5, Part 2, to make the plan sound. It is proposed that this wording is included within the SPD.</p> <p>Delivery of Infrastructure</p> <p>Pedestrian Bridge over the Railway Line</p> <p>DFT Representation 13: DFT proposes the inclusion of a new sentence within the delivery section of the SPD. “The site is located within an Opportunity Area. Opportunity Areas are key sources of housing supply in London. They are, by their nature, complex to bring forward and often require significant investment in infrastructure. The Council will take into consideration the viability challenges of the site when assessing the requirements under affordable housing and other policies.”</p> <p>DFT Representation 14: DFT proposes the inclusion of a new sentence within the delivery section of the SPD. “The SPD will require significant infrastructure provision which may have an impact on deliverability, capacity and viability. Where this is evidenced, the policies set out in this local plan may be applied flexibly to ensure that the sites are viable and deliverable”.</p> <p>DFT Representation 15: The estimated gross costs for infrastructure costs in all growth scenarios by category, are set out in Section 7.3 Delivery of Infrastructure (page 88). The costs of infrastructure is a conservative estimate in our opinion, and does not yet represent the likely end costs. This is a limitation of an SPD, and should be acknowledged within the SPD. The effects of a significant increase in costs should also be addressed in the SPD.</p> <p>DFT Representation 16: The bridge over the railway is a significant piece of infrastructure. It should be subject to a specific cost at page 88. Currently it is unclear what the cost is, and if it is reasonable and accurate.</p>	<p>Text has been added to highlight the important role of Opportunity Areas.</p>
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	<p>DFT Representation 17: Page 29 refers to a new pedestrian and cycle bridge across the railway, delivered to specific construction phases and secured by legal agreement. Page 91 of the SPD suggests that the Council expects that developers engage with all relevant parties to ensure that the bridge is brought forward at an early phase of the development. The SPD should recognise that this will be subject to funding and construction phasing. Any bridge maintenance and servicing arrangements will need to be agreed via S106. These costs could be significant and we welcome clarification of these.</p> <p>6 Elizabeth Line Station</p> <p>6.1 CO7 requires a design that safeguards a future Elizabeth Line station.</p> <p>7.3 Delivery of Infrastructure (page 87) demonstrates that there is no deliverable proposal for an Elizabeth line station at Kensal Canalside. This assessment will inform the next review into the Local Plan.</p> <p>7 Height and Massing</p> <p>DFT Representation 18: Section 6.2 Height and Massing (page 74) general height strategy diagram ‘areas where taller buildings might be acceptable outside of the general height strategy’ broadly represents the area where a public square might be located on the DFT land as the landing point to the pedestrian bridge. The area denotated requires expanding.</p> <p>DFT Representation 19: Page 75 refers to the unacceptability of clusters of tall buildings. DFT do not agree with this statement (see Document 7 Capacity Scenarios for Testing) as the SPD will comprise, by definition, clusters of tall buildings. The text ‘clusters of tall buildings will not be supported’ should be deleted. Policy D9 of the London Plan defines tall buildings as any building above 7 storeys.</p> <p>8 Transport</p> <p>DFT Representation 20: DFT would like the Council to ensure that the DIFS modelling and strategic highway modelling assessments are co-ordinated to reflect the potential costs of infrastructure required to deliver the SPD.</p>	<p>Noted. Flexibility is built into the SPD to ensure the deliverability of the Opportunity Area. Any forthcoming applications will require a viability assessment. Applications will be determined in line with the Development Plan and any other material planning consideration.</p> <p>The infrastructure costs presented in the SPD are labelled as estimated costs which establishes the limitations of the DIFS. Any forthcoming applications will require a viability assessment.</p> <p>Estimated costs are detailed more fully in the background DIFS.</p> <p>Noted. Indicative costs are provided in the DIFS. Detailed costs can only be established when a detailed design for</p>
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	<p>8.1 At present there are some points of clarification which need to be addressed. These are set out below.</p> <ul style="list-style-type: none"> • ☐ The evidence base reports that the main constraint at Ladbroke Grove station is the entrance width to the station, which may be insufficient for current usage. In addition, the size of the concourse and the number of gates required are also considered to be approaching capacity. The modelling indicates that the SPD development would result in demand exceeding capacity and therefore mitigation would be required. It is however unclear what the cost of this mitigation would be. • ☐ The VISSIM network model, (raised at the SPD Transport Modelling meeting) has not yet been provided as part of the SPD evidence base. • ☐ The Project Centre modelling may need to be updated to include trips associated with the North Pole site to ensure that junction capacities will be sufficient. • ☐ The refreshed DIFS concludes that the proposed Ladbroke Grove/Canal Way/Kensal Road junction improvements would be adequate to meet the needs of development Scenarios 1, 2 and 3, subject to a Road Safety Audit. The junction capacity test results for the denser scenarios will need checking when drawing this conclusion. • ☐ Appendix D, which provides further detail on the bridge cost estimate, describes the bridge as a new road and pedestrian bridge, providing two traffic lanes of 6.5m each and two footways of 2.5m each. This width appears to be overly generous for a pedestrian/cyclist bridge, adversely affecting infrastructure costs. • ☐ Paragraph 3.29 states that the only rail costs included are those with and without the Crossrail station and no further costs have been allowed for any upgrades to the existing train and 	<p>a bridge is brought forward as part of a planning application.</p> <p>The height map is indicative only and the accompanying text has been amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan.</p> <p>Noted, same as above.</p>
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		<p>underground network. The Strategic Transport Modelling identified predicted crowding on services and capacity issues at the Ladbroke Grove Underground Station therefore it is anticipated that additional infrastructure will be required and the cost of this needs to be considered and included in the SPD.</p> <ul style="list-style-type: none"> • ☐ The SPD states that the development would be expected to contribute towards step free facilities at Ladbroke Grove Underground Station and any other necessary infrastructure. No costs have been allowed for this yet. • ☐ A cost of £586k is allowed for the provision of a new signalised junction at Ladbroke Grove/Barlby Road, which is allocated solely to the North Pole Depot site. Allocating all of the cost of this junction improvement to the North Pole Depot site appears disproportionate as the North Pole Depot site will not generate significant vehicular traffic (with only disabled parking being proposed). The traffic modelling included in the evidence base did not include this junction improvement and did not indicate that such an improvement would be required to enable the development. <p>9 Document 7 Capacity Scenarios for Testing DFT Representation 22: Document 7 Capacity Scenarios Table considers 4 development options (3,503, 4,200, 4,319, and 5,000 homes). The document assumes a development ratio across the north and south sections of 75:25. DFT notes that the medium development scenario (4,200 homes), in error, does not apply the 75:25 ratio and this should be rectified within the document. The medium capacity scenario should refer to 1,050 homes on the south side of the site.</p>	<p>The indicative DIFS and strategic transport assessment is sufficiently detailed to provide a high level acknowledgement of viability constraints for the site.</p> <p>New text has been added to clarify that a local network traffic model created for the Council in conjunction with TFL has been created to assess any forthcoming applications. This model includes the junction on Barlby Road.</p> <p>Noted</p>
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			<p>Noted.</p> <p>Noted. The DIFS provided a high-level assessment of infrastructure costs. Any forthcoming application will be required to submit a viability assessment.</p> <p>Noted, as above</p> <p>The SPD does not require a new signalised junction at this location. New text has been added to clarify that a local network traffic model created for the Council in conjunction with TFL has been created to assess any forthcoming applications.</p>
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40	St William	<p>On behalf of our client, St William, we are writing to set out our comments on the Draft Kensal Canalside SPD (the “Draft SPD”). St William are joint venture partners with National Grid and consequently have a direct land ownership interest in Kensal Green Gasworks site, which forms a key development site within the Kensal Canalside Opportunity Area and the Draft SPD.</p> <p>Thank you for providing us with the opportunity to comment on the Draft SPD. We are very pleased to be engaged in this collaborative process.</p> <p>The Kensal Canalside Opportunity Area (the “KCOA”) represents the single largest regeneration opportunity in the Royal Borough of Kensington and Chelsea (“RBKC”). Appropriately optimising the development potential of the KCOA is consequently fundamental to achieving the regeneration aims of RBKC’s Local Plan and the new London Plan, particularly in relation to RBKC’s ability to meet its’ housing targets.</p> <p>We consequently fully support the key objectives of the Draft SPD to deliver a minimum of 3,500 new homes and new employment opportunities by transforming the Draft SPD area into a high-quality, well-connected, attractive and sustainable Canalside neighbourhood for people to live in, work in and visit. However, we have a number of comments on the Draft SPD which we hope will assist in achieving the</p>	Noted. Correction made.

		<p>policy objectives for the KCOA. These are detailed in Appendix 1, but in summary relate to the following key points:</p> <ol style="list-style-type: none"> 1. Flexibility – The Draft SPD is rightly intended to guide development in the KCOA within the context of adopted planning policy. In this respect it is essential that the Draft SPD builds in appropriate flexibility on the interrelated topics of density, building height, housing numbers/mix/tenure and infrastructure to ensure the shared ambitions of the KCOA can be viably delivered. 2. Building Height – The Draft SPD should not be prescriptive about defining or constraining maximum building heights, or specifically prohibiting clustering of tall buildings, as these are matters to be determined through the planning application process based on detailed testing of townscape, environmental impacts and implications for viability/deliverability. The reference to Trellick Tower being a maximum height should be removed, as it is not relevant to an assessment of the merits of building height within the KCOA. 3. Surplus Utility Sites – It is important that the Draft SPD accurately reflects London Plan policy relating to the affordable housing 35% threshold approach applicable to surplus utilities sites with demonstrably extraordinary decontamination, enabling or remediation costs. 4. DIFS – The DIFS cannot represent a fixed position on infrastructure delivery costs and it is premature to state that the only flexibility for viability is the number of homes delivered and the percentage of affordable housing. The DIFS itself acknowledges it is a high-level exercise based on a number of assumptions and caveats. This leads to the conclusion that the Draft SPD needs to be more flexible about the way the DIFS is used, because detailed site-specific viability work in support of the planning applications will supersede the DIFS. This is important given the Draft SPD confirms that the lower capacity tested scenario (3,500 homes) 	<p>Noted.</p> <p>Noted. The height map is indicative only and the accompanying text has been amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan.</p> <p>Noted. Text amendments have been made to ensure alignment with the London Plan.</p> <p>Noted. Amendments have been made to the text to note flexibility.</p>
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was not viable at 35% affordable housing with the identified infrastructure contributions.

5. Canal Bridge – St William support the Draft SPD’s aspiration to provide a new bridge over the canal at the western end of the KCOA. However, deliverability relies on land outside of St William’s control, owned by the Canal & Rivers Trust (CRT) and Kensal Green Cemetery. St William cannot support a position (such as a Grampian condition or S106 obligation) requiring the deliverability of this bridge prior to commencement or occupation of any specific phase of development. Nonetheless St William are happy to protect the bridge landing point within their land ownership and to continue to work with RBKC, the GLA, Historic England, CRT and Kensal Green Cemetery to determine the best way to secure delivery of this bridge.

We look forward to continuing to engage collaboratively with the Council as the Draft SPD is taken forwards.

SPD Page / Ref.	Comments	Proposed Alternative Wording
Pg.18: 2.1 Site and its Surroundings	Please note that both gas holders on the Kensal Green Gasworks site have now been demolished. The text and images used throughout the Draft SPD should be reviewed accordingly.	

Noted. The Council consider the delivery of a bridge here to be fundamental to the success of the development.

Noted change made to the constraints map. It is not considered necessary to repeat this throughout as it provides context for many residents.

			<p>Pg.52: Policy LWV1</p> <p>Affordable Housing</p>	<p>This amendment is important to ensure consistency with the adopted London Plan policies H4 (Delivering affordable housing), H5 (Threshold approach to applications), paragraph 4.5.7 and footnote 59 in terms of the approach to surplus utilities site.</p>	<p>‘A minimum of 3500 new homes, of which 35% (<u>including on surplus utilities sites with demonstrably extraordinary decontamination, enabling or remediation costs</u>) and 50% on <u>other</u> public land /or former utilities industrial land must be genuinely affordable, and aspire to meet the borough’s tenure need, subject to viability.’</p> <p>Footnote 2. also refers to the Draft LondonPlan, now replaced with the adopted London Plan.</p>	<p>This is included in the additional text and not considered necessary to repeat here.</p> <p>Reference to London Plan, 2021 text change made.</p>
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			<p>Pg.53: 'What is Genuinely Affordable in RBKC?'</p>	<p>The RBKC 'Community Housing SPD' is guidance, not policy.</p> <p>The Draft SPD should also reference the London Plan Policy H6 definition of 'genuinely affordable housing', being:</p> <ul style="list-style-type: none"> - Homes based on social rent levels, including Social Rent and London Affordable Rent - London Living Rent - London Shared Ownership 		<p>Noted and London plan policy on the definition of genuinely affordable housing is referenced.</p>
			<p>SPD Page / Ref.</p>	<p>Comments</p>	<p>Proposed Alternative Wording</p>	

			<p>Pg.55: 1st para.</p> <p>Affordable Housing</p>	<p>This amendment is important to ensure consistency with the adopted London Plan Policies H4 (Delivering affordable housing), H5 (Threshold approach to applications), paragraph 4.5.7 and footnote 59 in terms of the approach to surplus utilities site.</p>	<p>'However, if it is robustly demonstrated that extraordinary decontamination enabling or remediation costs <u>must be incurred</u> are required to bring these <u>surplus utilities</u> sites forward <u>for development</u>, then subject to <u>detailed evidence, including</u> viability evidence <u>being made available</u>, a 35% affordable housing threshold could be applied in order to follow the fast track route.'</p>	<p>Amendments to the text have been made to ensure alignment with the London Plan, 2021.</p>
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			<p>Pg.55: Tenure Mix table and supporting text</p>	<p>This amendment is suggested to accord with London Plan Policy H6 (Affordable housing tenure) and RBKC's Community Housing SPD paragraph 4.16 (among other references), which include London Affordable Rent within the 'Social' definition.</p>	<p>'70% Social / <u>London affordable</u> rent'</p> <p>'To meet the identified borough need, 70% of affordable homes built should be social / <u>London affordable</u> rented with the remaining 30% being intermediate.'</p>	<p>Amendment to the table has been made to reference this.</p>
			<p>Pg.55: Housing Mix table and supporting text</p>	<p>These amendments are necessary to ensure the Draft SPD is aligned to accord with RBKC's adopted Local Plan Policy CH3 and supporting text.</p> <p>The 'Housing Mix' table in the Draft SPD appears to reflect RBKC's 2015 SHMA. Whilst the SHMA is referred to in the RBKC Local</p>	<p>'It is important that the size of homes that are built at Kensal Canalside meets the needs of our communities. <u>A mix of types and sizes of homes will be sought taking into account the characteristics of the site, and current evidence in relation</u></p>	

			<p>Plan the housing mix itself is not planning policy.</p> <p>The SHMA is somewhat outdated, represents a Borough-wide position and is not specific to the Kensal Canalside Opportunity Area. Including the Housing Mix table in the Draft SPD is consequently in conflict with Local Plan Policy CH3 which requires a mix taking into account site characteristics and current evidence in relation to housing need.</p> <p>The Housing Mix table should consequently be deleted and references should be made to up to date housing need specific to Kensal.</p>	<p><u>to housing need.</u></p> <p>The Housing Mix table should be deleted and reference made to up to date housing need specific to Kensal.</p>	<p>Text has been amended to align with the Development plan.</p> <p>The table has been deleted.</p>
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SPD Page / Ref.	Comments	Proposed Alternative Wording
Pg.56: 2 nd para. Specialist Housing Need	<p>These amendments are suggested to align with the adopted London Plan and Local Plan policies which more generally ‘support’ and ‘encourage’ provision of such forms of specialist housing where an identified need will be met.</p> <p>In addition, more flexibility is required to reflect the New Local Plan Review (September 2020) paragraph 5.17 that the Council ‘need to revisit and understand the future need for the various types of specialist older people’s</p>	<p>‘The site must <u>should seek to</u> optimise the delivery of housing of all types, and this must include <u>the provision of specialist housing which meets an</u> the identified specialist housing needs of the borough (<u>based on current evidence</u>), <u>will be supported</u>. The developer will be expected to <u>should</u> work with our housing team to <u>establish whether identified specialist housing needs could feasibly be met on the site</u> and if so, seek to ensure this comes forward. The table sets out the Specialist housing</p>

Text has been amended and the table has been deleted to ensure alignment with Development Plan policies.

			<p>that appropriate heights will be subject to further site analysis, impact testing and height strategy. In this respect, the rationale for specifying 4-20 storeys on the Height plan is not justified within the accompanying text.</p> <p>For larger regeneration schemes such as Kensal Canalside, a bespoke approach to design is needed for a site to realise its full potential and deliver high quality placemaking. Rigid guidance can be overlyrestrictive and can hinder the delivery of innovative solutions. It will be crucial that the SPD maintains a level of</p>		<p>The height map is indicative only and the accompanying text has been amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan.</p>
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			<p>flexibility in relation to building heights.</p> <p>That said, St William are generally supportive of the locations identified on the Height plan for 'Areas where taller buildings might be acceptable' so far as they relate to the St William land interest.</p>							
			<table border="1"> <thead> <tr> <th>SPD Page / Ref.</th> <th>Comments</th> <th>Proposed Alternative Wording</th> </tr> </thead> <tbody> <tr> <td>Pg.75: Taller Buildings text</td> <td>The SPD text and diagrams should not be overly prescriptive with regards to appropriate building heights, as this conflicts with the acknowledgment that appropriate heights will be subject to impact testing and height</td> <td>Height in these areas is less constrained. Isolated p Points of height, designed as part of the site-wide height and massing strategy, offer opportunities to aid legibility and wayfinding and should be justified as</td> </tr> </tbody> </table>	SPD Page / Ref.	Comments	Proposed Alternative Wording	Pg.75: Taller Buildings text	The SPD text and diagrams should not be overly prescriptive with regards to appropriate building heights, as this conflicts with the acknowledgment that appropriate heights will be subject to impact testing and height	Height in these areas is less constrained. Isolated p Points of height, designed as part of the site-wide height and massing strategy, offer opportunities to aid legibility and wayfinding and should be justified as	
SPD Page / Ref.	Comments	Proposed Alternative Wording								
Pg.75: Taller Buildings text	The SPD text and diagrams should not be overly prescriptive with regards to appropriate building heights, as this conflicts with the acknowledgment that appropriate heights will be subject to impact testing and height	Height in these areas is less constrained. Isolated p Points of height, designed as part of the site-wide height and massing strategy, offer opportunities to aid legibility and wayfinding and should be justified as								

				<p>strategy.</p> <p>In this respect reference to Trellick Tower is arbitrary as this existing building located over 700m away has no bearing on the townscape merits of building heights in the Opportunity Area. It is inappropriate for Trellick to be referenced and dictate building heights within the Opportunity Area.</p> <p>In addition, it is not appropriate for the Draft SPD to categorically state that clusters of tall buildings will not be supported, as this is also a matter that will be subject to impact</p>	<p>such in any application. When used infrequently, rather than as a cluster they can act as a local landmark.</p> <p>Within the local context, the Grade II* Listed Trellick Tower acts a local landmark aiding legibility and its height should be used as a maximum reference point for these areas.</p> <p><i>*Delete final sentence above referencing Trellick Tower as proposed OR if remains, at minimum delete 'maximum'.</i></p> <p>Clusters of tall buildings will not be supported.</p>	<p>The height map is indicative only and the accompanying text has been amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan.</p>
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			Pg.86: 7.2 Affordable Housing text	<p>It is premature and inaccurate to state that the need to provide infrastructure set out in the SPD means that the only flexibility for the viability of the site is the number of homes delivered and the percentage of affordable housing.</p> <p>The DIFS itself includes a number of assumptions and caveats, recognising that information is limited and that detailed site specific work in support of the planning applications may supersede the DIFS. This leads to the conclusion that the Draft SPD needs to be more flexible in</p>	<p>‘The delivery of affordable housing is a key priority for Kensal Canalside. All infrastructure identified in the SPD (and DIFS) is <u>currently considered to be essential</u> for the creation of a successful place, <u>subject to further testing and assessment</u>. The DIFS identifies that the required surplus needed to fund the <u>currently envisaged</u> upfront infrastructure requirements is limited in scenarios 2 and 3 when delivering 35% affordable housing.</p>	<p>The text has been amended to clarify flexibility in viability of the site. The text has also been amended to clarify the findings of the DIFS.</p>
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			<p>allowing infrastructure, or the number of homes delivered, or affordable housing to be flexible, subject to detailed assessment.</p> <p>This is important given the Draft SPD confirms that the lower capacity tested(3,500 homes) was not viable at 35% affordable housing with the identified infrastructure contributions.</p>	<p>There is no surplus generated in scenario 1. As a result, it is clear that in order to provide a viable scheme that can deliver good levels of affordable housing, the site would need to be delivered at high density.'</p> <p>'The currently envisaged need to provide the infrastructure set out in the SPD means that the only flexibility for the viability of the site is the number of homes delivered and the percentage of affordable housing.</p>	
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					<p>Therefore, t The Council will support developers in optimising housing delivery, through a design led approach which underpins a sustainable and high-quality masterplan, to ensure the maximum number of affordable homes can be provided on the site. The Council will also explore the possibility of funding from other sources to boost the delivery of affordable housing with the developers.'</p>	
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			SPD Page / Ref.	Comments	Proposed Alternative Wording	
			Pg.87/88 7.3 Delivery of Infrastructure	<p>The Draft SPD explains that the DIFS provides more detail on how the required infrastructure will be funded, referring to a table on Page 88 which sets out the estimated gross infrastructure costs in the three scenarios tested.</p> <p>It is important to clarify that the costs identified in the table are indicative only, because the DIFS is a high level exercise covering the entire KCOA, based on a number of assumptions and</p>		The table is labelled as 'Estimated costs' which clarifies their function.

			<p>caveats. It does not reflect the specific viability circumstances of the different sites within the KCOA, or the detailed viability testing that will be undertaken at application stage, which is likely to result in a trade-off between infrastructure, affordable housing and density. St William consequently reserve their position to undertake detailed site specific viability discussions on the matter.</p>		<p>Noted.</p>
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		Pg.89: Bridgestext	<p>St William support the Draft SPD's aspiration to provide a new bridge over the canal at the western end of the KCOA. However, deliverability relies on land outside of St William's control, owned by the Canal & Rivers Trust (CRT) and Kensal Green Cemetery.</p> <p>St William cannot support a position (such as a Grampian condition or S106 obligation) requiring the deliverability of this bridge prior to commencement or occupation of</p>	<p>'Where an individual developer is relying upon the delivery of infrastructure on land it does not control, such as one of</p> <p>the bridge landing points,</p> <p>‡ The council will require some certainty that the relevant elements of infrastructure will be delivered by the <u>any</u> landowner/developer who controls the land on which that infrastructure has been <u>indicatively</u> identified to be located by this SPD will <u>to, where relevant, use reasonable endeavors to work with other landowner(s)/developer(s) who also control land on which the same infrastructure has been indicatively identified to</u></p>	<p>Noted. The Council consider that the bridge is fundamental to the successful delivery of the development in order to achieve the vision and objectives set out in the SPD. Land ownership issues are sufficiently acknowledged within the SPD text.</p>
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			<p>any specific phase of development. Nonetheless St William are happy to protect the bridge landing point within their land ownership and to continue to work with RBKC, the GLA, Historic England, CRT and Kensal Green Cemetery to determine the best way to secure delivery of this bridge.</p> <p>Amendments to the Draft SPD are suggested to acknowledge that the delivery of bridges relies on multiple land owners.</p>	<p><u>be located, with the aim of providing the council with some certainty that the relevant infrastructure could be delivered.'</u></p>	
Kensal Canalside Capacity Scenarios Comments					

Page / Ref.	Comments	Proposed Alternative Wording
Pg.2 Introduction	<p>We have a number of concerns regarding the accuracy of the capacity work undertaken.</p> <p>For example, it is not clear from the document what detailed assumptions have been used to underpin the capacity testing, in terms of unit mix, unit sizes, building efficiency etc and how they drive the massing options and heights presented.</p>	

Noted. Sufficient wording is included within the Capacity Scenarios document that sets out its high level indicative role.

				<p>As such, it is important that the wording in the document makes it clear that the capacity work is illustrative only and should not be used for the purpose of considering actual massing outcomes and that other solutions may be appropriate subject to more detailed testing assessment.</p>		
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			Pg.4-11 Capacity Scenarios	We note that none of the capacity testing scenarios include options for 'tall buildings' (i.e. above 20 storeys) within the St William land ownership. This is contrary to the 'Areas where taller buildings might be acceptable' identified on Page 74 of the Draft SPD, which specifically identifies part of the St William land as being appropriate for potential taller buildings.		<p>The height map is indicative only and the accompanying text has been amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan.</p> <p>Within the capacity scenarios document buildings that sit outside of the indicative height strategy are shown in the St William Land Ownership area.</p>
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				<p>As such, the capacity testing should as a minimum reflect the approach to 'taller buildings' set out in the Draft SPD.</p>		
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41	GLA	<p>Statement of general conformity with the London Plan (Planning and Compulsory Purchase Act 2004, Section 24(5) (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local Development) (England) Regulations 2012</p> <p>RE: Kensal Canalside Opportunity Area draft SPD</p> <p>Thank you for consulting the Mayor of London on the Kensal Canalside Opportunity Area draft Supplementary Planning Document (SPD). As you are aware, all Local Development Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004). While the draft Supplementary Planning Document is not a Development Plan Document, it is considered to be a Local Development Document. As such the Mayor may give an opinion as to the general conformity of a Local Development Document with the London Plan under section 24(5) of the PCPA 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) have also provided comments, which I endorse, and which are attached separately. This letter provides advice and sets out where you should consider making further amendments so that the draft Plan is consistent with the London Plan 2021 (LP2021). The London Plan 2021 was formally published on the 2 March 2021, and now forms part of the Royal Borough of Kensington</p>	

	<p>and Chelsea’s Development Plan and contains the most up-to-date policies. All references to the ‘intend to publish’ or ‘new’ London Plan should be updated to reflect the publication version.</p> <p>The SPD and its ambition to deliver the indicative homes and jobs identified for the opportunity area in Policy SD1 of the LP 2021 is welcomed and supported. The Mayor also welcomes the use of a design led approach and scenario testing to understand how the sites can be optimised for housing delivery in line with Policy D3 of the LP 2021. In supporting Good Growth, boroughs must ensure that the supporting infrastructure required to unlock growth in opportunity areas is identified upfront and delivered from the outset (or phased appropriately). In setting out the potential scenarios for housing delivery, the SPD should be clear about the necessary infrastructure requirements that must be delivered to support them.</p> <p>The Mayor welcomes the preparation of a DIF study. The borough should consider whether the information in the study could be used to provide greater certainty on the types and location of supporting infrastructure required, for example health facilities.</p> <p>The inclusion of the requirement for 35% affordable residential floorspace and 50% affordable residential floorspace on public sector land in line with Policy H5 of the London Plan is welcomed. To help ensure closer alignment with Policy H5 officers recommend the SPD provide greater clarity that schemes achieve at least 35% and 50% respectively. The aim of the threshold approach is to help incentivise developers to bring forward schemes that can achieve at least 35% (or 50% on public or industrial land where capacity is lost) without grant so that they can follow the fast track approach.</p>	<p>Noted and text has been updated.</p> <p>The SPD is clear in setting out the minimum infrastructure requirements to deliver a successful place and the vision for Kensal Canalside. The development Infrastructure Funding Study provides additional detail for each scenario. The importance of phasing is highlighted in the Delivery chapter and will be crucial to the acceptability and success of any scheme.</p>
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		<p>The Mayor notes that at page 86 the SPD sets out the findings of the DIF study on the viability of 35% affordable housing against the three scenarios. However, the SPD should be clear that proposals will need to comply with the threshold approach in Policy H5 and provide viability evidence where they do not meet the fast-track route.</p> <p>The guidance provided regarding circumstances where a 35% affordable housing threshold could be applied on industrial sites does not reflect the policy requirements set out in footnote 59 of paragraph 4.5.7 of Policy H5. Please note this flexibility applies to surplus utility land in certain circumstances and this needs to be made clear to ensure alignment with the policy.</p> <p>The Mayor notes that the SPD includes indicative building heights and suggests locations where taller buildings may be suitable. The borough will be aware that LP2021 Policy D9 establishes that the definition of, and areas suitable for, tall buildings should be set out in a Development Plan Document, and that the adopted Kensington and Chelsea Local Plan does not identify areas suitable for tall buildings. The Mayor understands that a tall building policy will be included in the Local Plan review, and that the next iteration of the review is due to be published in the autumn. It would be helpful, in the meantime, if the borough could clarify the relationship between the section on heights in the SPD, LP 2021 Policy D9 and the Local Plan review.</p> <p>I hope these comments positively inform the development of the Kensal Canalside SPD.</p>	<p>Noted. The text has been amended to ensure alignment with the London Plan, 2021.</p> <p>Noted and the text has been amended to ensure closer alignment with the London Plan, 2021.</p> <p>Noted.</p> <p>The height map is indicative only and the accompanying text has been amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan.</p>
42	TFL (GLA)	<p>Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent</p>	

		<p>Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority (GLA).</p> <p>Comments</p> <ul style="list-style-type: none"> • General: The general emphasis in the draft SPD is aligned with TfL policies and priorities. It would be good to include reference to MTS objectives like Healthy Streets and Vision Zero more specifically where appropriate, as in policy CO1. • General: A Strategic Transport Report accompanies the SPD; the approach to strategic modelling has been agreed with TfL and the high-level conclusions are valid. The detail of the proposed highways and public transport interventions (namely at Ladbroke Grove LU station, the bus network and the junction of Ladbroke Grove and Canal Way) will need to be developed through the local modelling and assessment currently being undertaken. • General: It would be useful to clarify whether or not newly created streets will be adopted by RBKC. Additionally, clarity is needed about how the road space will be managed to ensure compliance with parking restrictions and how bus movements will be served, etc? • The document states that a minimum of 3,500 new homes and 10,000 sqm office space will be provided—what transport infrastructure is being assumed as being needed to support this level of growth? TfL is supportive of a balanced approach to any development in excess of this being taken, with the potential impact on local transport networks being taken into consideration. 	<p>Noted</p> <p>Noted.</p> <p>Text has been amended in the SPD to clarify that 'The Council has developed a local network traffic model audited and approved by TfL to assess any forthcoming development proposals.'</p> <p>The Council is open to including new streets within its Traffic Management Order (TMO). However, this is to be determined at application stage with a masterplan for the site.</p> <p>The Council commissioned consultancy Steer to undertake a strategic modelling exercise to identify strategic transport impacts of a development at the site. They identified a significant</p>
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	<ul style="list-style-type: none"> • Para 1.6: Connected: TfL is generally supportive of aspirations for a well-connected place that is well designed for pedestrians and cyclists. It should, however, also be ensured that any proposals do not have a negative impact on buses and bus movements, and that it is not designed for car become the dominant mode. As above, the outcomes of forthcoming future year traffic modelling will need to inform the ultimate street layout, the running of buses into the site and level of car parking. • Para 3.1 (p27): It would be helpful to clarify whether or not cyclists will still be able to use the tow path or just the proposed route through the site? • Para 3.1 (p27): CO3, could potentially also include reference either here or in the general text about new cycle routes/facilities following LCDS guidance. I could also reference the need for high quality cycle parking to be provided throughout the development, including in the public realm. It should be noted that the minimum standards contained in the London Plan for short stay cycle parking are a separate requirement to any cycle hire docking stations. • Para 3.2 (p33): The statement in the SPD in relation to the Elizabeth line is consistent with the letter sent from NR and TfL to RBKC earlier this year and is therefore supported. Para 3.2 (p33): No mention is made of the existing services that run north/south on Ladbroke Grove that serve the existing Sainsbury's store and the implications for these customers of moving the supermarket further to the west, nor is the impact of additional running costs. The ongoing dialogue between TfL, the Council and the land owners should continue to ensure that a proposal for buses which balances the need to serve the site with high quality public transport while protecting existing 	<p>increase in demand for bus services and passenger demand at Ladbroke Grove. As identified in the Development Framework of the SPD the Council expect several improved bus routes to be routed through the Opportunity Area alongside improved walking and cycling facilities both within and outside of the Opportunity Area to link into key surrounding destinations within the Active Travel Zone. Improved accessibility and capacity at Ladbroke Grove Station and other nearby stations is also expected. The Council also expect a new junction layout at Ladbroke Grove/ Canal Way/ Kensal Road to provide facilities for pedestrians and cyclists to satisfy development plan policies and bridge links across the railway and canal. We also expect a new priority junction on Barlby Road to provide access to the southern site.</p> <p>Noted.</p> <p>The connections map maintains a cycle route along the canal, however, the SPD identifies an opportunity to deliver an alternative route with the</p>
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	<p>passengers from the disbenefits of route diversions and manage the additional running costs incurred by extending routes. All additional running and infrastructure costs must be covered by the developers.</p> <ul style="list-style-type: none"> • Notwithstanding that the general principles set out for buses within the SPD (e.g. the need for a bus loop) are supported, further work is required to develop the preferred solution that works for both the new development and existing customers. Please add a specific requirement for the bus infrastructure—bus stands for four buses and bus driver facilities—within the development footprint. • Para 3.2. and 7.3: There is very limited mention of London Underground (LU) impacts. The baseline scenario is that Ladbroke Grove station will be the closest/most easily accessible (via foot, cycle or bus). Capacity enhancements funded via S106 contributions may be required to cater for additional development demand. This should be reflected in the SPD (not just the transport study behind it). Applications will need provide static analysis of station impacts as a minimum, and as briefly referenced in the draft SPD, it is expected that development in the OA will contribute towards the SFA scheme at Ladbroke Grove LU station to support accessible transport provision to/from the OA. • Para 3.3 (p35): We welcome the statement that any changes to the road network will need to be supported by transport modelling. This an ongoing process between TfL, the Council and the landowners that should be continued in the lead up to submission of any planning applications. • Para 3.3 (p35) Ladbroke Grove/ Barlby Road: We are not currently in a position to comment on the viability of the proposed signalisation nor on the network impacts the proposed access arrangement/development may 	<p>Opportunity Area to avoid potential conflicts.</p> <p>Further guidance on this policy position is not considered necessary given the impetus on improvements to cycle facilities in the SPD.</p> <p>Noted</p> <p>Noted and text added to clarify that ‘Every effort should be taken to protect existing passengers from the disbenefits of route diversions and manage the additional running costs incurred by extending routes.’</p> <p>Noted. Additional text included stating that ‘The existing bus stands will be re-provided within the development through the delivery of bus stands for four buses and bus driver facilities.’</p>
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	<p>have on the local network. Further comments on this can be provided as part of future discussions around the planning applications and as the future year local highway modelling is progressed.</p> <ul style="list-style-type: none"> • Para 4.2, Streets: We welcome the passing reference to a largely car free development in the text but this should be a firm requirement clearly specified. The London Plan 2021 requires all residential and office development in inner London Opportunity Areas to be car free. Retail development including at the proposed superstore would be dependent on the future PTAL. Sites in PTAL 5 – 6 it should be car free and in PTAL 1 – 4 car parking should be provided at a maximum of 1 space per 75 sq. metres of floorspace. The level of supermarket car parking should also reflect the need for the development to demonstrate how its supports a reduction in car mode share and car dominance, rather than a predict and provide approach. • Parking standards in the London Plan take precedence over any other parts of the Development Plan given its recent publication in March 2021. To provide certainty to developers, local residents and other stakeholders these standards (or a reference to London Plan standards) should be clearly set out in the SPD. In this context the references to parking in the boxes referring to specific streets on pages 41 should be modified to make it clear that in residential streets, only Blue Badge parking should be provided. Visitor and commercial parking should also be restricted to Blue Badge users. We also recommend more than 20% of the final number of residential spaces have electric vehicle charging points given the current policy direction towards this type of vehicle. • Para 6.3 (p77): This page considers the environment and sustainable design, and whilst the measures referenced are supported, the document 	<p>Associated changes made to the existing bus stops on Ladbroke Grove to accommodate this will be expected.'</p> <p>Text has been added to clarify the expected contributions to the underground network to ensure that capacity is managed.</p> <p>Noted. New text has been added to clarify that a local network traffic model created for the Council in conjunction with TFL has been created to assess any forthcoming applications.</p> <p>Noted.</p>
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	<p>is fairly quiet on how servicing will be catered for. Thought should be given to what measures could be implemented to prevent the streets being overrun with private hire vehicles and delivery vans as there is potential these types of trips could generate significant traffic movements between them. This would undermine some of the aspirations in the SPD. The potential for some kind of consolidation centre or concierge service that would minimise the number of vehicles on the internal road network should be explored, as required by London Plan policy relating to deliveries and servicing.</p> <ul style="list-style-type: none"> • Delivery: any proposed changes to the bus network need to be agreed with TfL and fully funded by third parties at no additional cost to TfL. • It is noted that the OA is exempt from BCIL and that the majority of the infrastructure required to support development will be delivered via either works in kind linked to delivery of each development plot or via S106 contributions. • Chapter 7.3 notes that the two bridges (over the railway line and the canal) could be difficult to deliver via the above mechanisms because of disparate land ownership. TfL considers the bridges to form crucial parts of the active travel connections to and from the OA. The individual planning applications will therefore need to assess scenarios with and without bridges as these have the potential to significantly change the connectivity of the site. • The delivery section regarding bus links is strongly supported and, as mentioned above, a balance must be struck between serving the site and development demand while managing the adverse impacts of additional running times and diverting services away from Ladbroke Grove. 	<p>Noted. The SPD sets out it's aspirations for a largely car-free development. Any application will be assessed in line with the Development Plan and as such further clarification is not considered necessary here.</p> <p>Noted.</p> <p>Text amended to align with the London Plan, 2021</p> <p>Guidance in the SPD on electric vehicle charging point provision aligns with the London plan, 2021.</p>
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		<ul style="list-style-type: none">• 7.4 construction: It would be helpful if this specifically mentioned arrangements for bus access and infrastructure during the construction period / delivery of various phases, and the approach must be agreed with the Council and TfL.	<p>This is noted at 4.2.</p> <p>Noted.</p> <p>Noted</p>
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			Noted Additional text included to clarify arrangements during construction
43	Cllr Sina Lari, Chair, RBKC Labour Group of Councillors	<p>While the site presents a significant opportunity to develop desperately needed social housing, there are a number of outstanding variables ranging from the remediation of toxic waste to the sheer number of landowners with different vested interests. These require more immediate concern.</p> <p>Housing The estimated level of delivery is 3,500 homes, and we have been informed that such high density is a necessity in order to maximise social housing. The 35% affordable policy target would result in 1225 affordable homes, which would then follow a 70/30 social rent/intermediate ratio to deliver 858 social rented homes. It is therefore deeply concerning that the draft SPD mentions a more “achievable” level of 30%, but only in the higher development scenario of 5000 homes.</p> <p>The financial strategy and commercial objectives of particular landowners (eg Ballymore) will result in pressure to produce the very lowest acceptable level of social homes. The council must do everything in its duty to maximise social housing and resist pressure in the viability process.</p> <p>Remediation and Viability</p>	<p>A high level viability test was run as part of the SPD process to understand the constraints of delivering such a site. The SPD clearly sets out the Council’s approach to ensuring the optimum delivery of high quality affordable homes. It is noted that any application submitted to the council will need to undergo its own viability testing that will be scrutinised by the Council.</p> <p>Noted.</p>

	<p>Original cost estimates for remediation of toxic waste were in the range of £30mm when estimated years back. We still do not know the true figure. While remediation costs do not, and must not, absolve landowners of responsibility to deliver social housing, there is an outstanding concern. The affordable housing target on public-owned land is 50% (as opposed to 35% on private land). However, should a landowner prove exceptional remediation costs, they may exempt themselves from this policy and produce the lower level of 35%. This is another barrier the council must overcome to maximise its social housing objectives.</p> <p>Height We are informed the heights would range from c. 20 storeys to c. 4 storeys throughout the site. Changing attitudes towards tall buildings mean there is little appetite amongst local residents or indeed more widely for residential skyscrapers. Nor will they be appropriate in the area. The number of tall buildings beyond 8 storeys must therefore be limited.</p> <p>Transport This is one of the most significant concerns. For years, RBKC has toyed with the folly of a Crossrail/Elizabeth Line station on the site, original cost estimates for which were £30mm but likely now to be higher. While the draft still mentions the possibility of such a station, the Council must face the reality that this is not a likely outcome. As it stands, transport links and accessibility are far from appropriate for a plan of this scale. The developments would undoubtedly result in the creation of a whole new three-member Council ward in the Borough, in an area without any existing tube stations and very limited TfL presence altogether. It is simply impossible for the plans as they stand to be supported through existing transport links. While much emphasis in the draft is being made towards cycling, this is not the solution.</p>	<p>Noted in the SPD</p> <p>The height map is indicative only and the accompanying text has been amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan.</p> <p>The SPD confirms at 7.3 that an Elizabeth Line station has not yet been proven feasible and no further feasibility work is anticipated within the lifetime of the Local Plan. Transport for London and Network Rail have</p>
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		<p>Green space is a further issue. The recreational green space being referred to in the draft is the Kensal Green Cemetery. A cemetery is not necessarily an appropriate family-oriented space to allow young people and children to play freely and the Council needs to clarify exactly what its plans are for family-friendly recreational spaces in a development of this scale.</p>	<p>confirmed that for the foreseeable future they will be concentrating on nationally significant infrastructure projects.</p> <p>Text has also been added to clarify the expected contributions to the underground network to ensure that capacity is managed.</p> <p>The SPD states that high quality public green spaces must form part of a clear narrative and be designed into the masterplan at an early stage. A public realm strategy is required to be submitted and applications will be expected to deliver play and informal recreation in line with London Plan Policy S4.</p>
44	Andy Bradfield	<p>I am really puzzled about this idea of a “station” This has come up time & again in relation to this site, even before these plans and has continually been rejected by network rail. I can’t see why they would suddenly change their minds (even though it would be great to have a station here,) it should have been done as part of crossrail</p>	<p>The SPD confirms at 7.3 that an Elizabeth Line station has not yet been proven feasible and no further feasibility work is anticipated within the lifetime of the Local Plan. Transport for London and Network Rail have</p>

	<p>I do not like the idea of access through the cemetery. This is likely to be extremely dangerous at night, and will likely not be policed properly or at all.</p> <p>It looks horrendously dense for such a small site – I thought council’s were moving away from such dense housing, as it caused too many issues (esp. after covid – dense population was REALLY not a help was it?)</p> <p>I mean 20 stories? It’s just too high in my opinion.</p> <p>The access to this site is shared with sainsbury’s – this is busy even at quiet time, and it is just going to get a whole lot worse. It’s like the elephant in the room.</p> <p>During construction it will be bad – and it will stay that way after with the shere amount of residents coming and going.</p> <p>The commitment to social housing is also very vague – and the developers need to be kept to their promises.</p> <p>All in all – it’s too big, no provision for properly fixing site access by road (it’s all gonna get left to the tiny junction and roundabout at Ladbroke grove! God help us – the traffic will not suddenly vanish – it WILL get much worse and stay that way, and it needs to be properly planned for.</p> <p>It is as important as the planning of the building’s – as there is no other way in & out of the site by road, and the site is cornered by the canal, railway and cemetery – effectively cut off save for 1 road.</p>	<p>confirmed that for the foreseeable future they will be concentrating on nationally significant infrastructure projects.</p> <p>The SPD sets out that any access through the cemetery would be subject to opening hours as agreed by the Cemetery company and necessary associated works to ensure a safe and legible route. A heritage impact assessment is also required.</p> <p>Kensal Canalside has been allocated to deliver a minimum of 3,500 homes in the Local Plan. The SPD sets out the Council’s approach to ensuring the optimum delivery of high quality affordable homes given the housing needs of the Borough.</p> <p>The height map is indicative only and the accompanying text has been amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan.</p>
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		<p>All in all I think the proposal is extremely flawed. I hope you take these objections into account</p>	<p>The SPD sets out that a Construction traffic Management Plan is required with any application submission.</p> <p>Any application will be subject to viability testing to ensure the optimum number of affordable homes is delivered in line with the Development Plan Documents.</p> <p>The SPD promotes a largely car free development and active travel in line with the London plan, 2021. New text has been added to clarify that a local network traffic model created for the Council in conjunction with TFL has been created to assess any forthcoming applications.</p> <p>Noted</p>
45	The Historic Buildings & Conservation Committee of the London and Middlesex	The London and Middlesex Archaeological Society (LAMAS) promotes London's archaeology, local history, and historic buildings. The LAMAS Historic Buildings and Conservation Committee reviews planning applications relating to important historic buildings and seeks to ensure a sustainable future for vital aspects of London's built heritage. On occasion, it also reviews other forms of planning documentation, and is	

<p>Archaeological Society</p>	<p>pleased to offer the following comments in response to the Supplementary Planning Document (SPD) for the Kensal Canalside site. The Committee considers the basic premise of redeveloping the Kensal Canalside Opportunity Area as defined in the SPD to be a worthy effort. It notes that heritage is referenced multiple times in the SPD as a consideration in the plans for the site, and many more times in the supporting documents, and endorses the undertakings already made or promised in this regard. Notwithstanding these, the Committee feels that even at this very early stage in the redevelopment process more attention needs to be paid to the historic environment, and in particular the undesignated heritage assets inside the Opportunity Area boundary. It expects this shortcoming to be addressed in the next iteration of the SPD and/or supplementary reports, including the Strategic Environmental Assessment (SEA), and as part of any outline Master Plan that is subsequently submitted.</p> <p>Mention is made in the SPD of how the emerging plans for Kensal Canalside will 'Build on its industrial heritage' (page 12). The recent removal of the two gasholders, however, has robbed it of its two largest and certainly visually most significant industrial heritage assets and thus the opportunity for creative repurposing in the manner of the former water tower in the north-east corner of the Opportunity Area. It is understandable why the SPD and associated documents on balance pay more attention to the designated heritage assets surrounding the Opportunity Area than the undesignated but nonetheless significant infrastructural heritage assets that lie within it. Some encouraging proposals regarding undesignated assets are made in the SPD, notably in the stated intention to restore 'Gasworks Dock 1' as a water-filled feature (page 26). Future plans made for the Opportunity Area should be based in part on a thorough professional assessment of all heritage assets present within its boundary as well as those that lie beyond it, to serve as a</p>	<p>Noted.</p> <p>Specific wording clarifying how undesignated assets should be dealt with has been added to the SPD.</p> <p>The SEA has been updated to reflect the changes made to the SPD following consultation.</p> <p>Noted. The gas holders have now been removed from the site.</p> <p>Noted.</p>
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	<p>baseline for how they might be protected and integrated with new development across the site.</p> <p>To assist with the progressing of the proposals for Kensal Canalside, and to contribute towards redressing the present imbalance between designated and undesignated heritage assets apparent in the SPD etc., the Committee wishes to highlight the following aspects of the heritage context that it considers require more thought and investigation.</p> <p>Gasworks boundary wall. The loss of the two gasholders imparts greater significance on the remaining surviving elements of the Kensal Green Gasworks. Among these is the tall brick wall running along the south side of the Grand Union Canal towpath, being the former northern boundary of the Gasworks. As well as being an important physical remnant of the Opportunity Area’s industrial heritage, the wall provides a limit to the environment of the canal, helping to define a space of tranquil, almost rural character. The SPD understandably puts considerable emphasis upon future development having a “strong relationship” to the Grand Union Canal, but this should not come at the expense of the historic and natural environment of the south side of the canal. Retention of substantial sections of the wall (and restoration of those parts of it that are damaged or covered by graffiti) would serve to preserve the present — and, by implication, past — character of this section of the Grand Union Canal.</p> <p>Southern half of Grand Union Canal. It is noteworthy that the portion of the Grand Union Canal within the Opportunity Area is not designated as a Conservation Area, while the northern half is afforded such protection but as a buffer to the one based on Kensal Green Cemetery (this stands in contrast to the situation in neighbouring Hammersmith & Fulham, where the entirety of the Grand Union Canal and its immediate surroundings is designated as a Conservation Area). As a consequence, the boundary wall, two dock bridges and the gasworks docks are all outside Conservation</p>	<p>Noted. Addition of wording clarifying the importance of undesignated heritage assets has now been included, as above.</p>
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	<p>Area protection and have no other current heritage designations. An extension to the existing Kensal Green Cemetery Conservation Area or creation of a new one is perhaps too much to hope for as part of the Kensal Canalside project, but the situation underlines the need to proceed with caution and much greater awareness of the heritage significance of the portion of the Grand Union Canal within the Opportunity Area.</p> <p>Historic rail and tunnel features. Away from the canal, the Committee notes how multiple times in the SEA, drawing upon an earlier assessment of the site, reference is made to the finding that 'There are 43 historical railway and tunnel features on site; these are reported to be railway sidings, tramway sidings and railway and range from the years 1870 to 1996'. No reference appears to be made to the possibility of any of these features being retained as part of the phases of future development, which cumulatively would be a considerable loss; not only in heritage terms, but in the interest that such assets could provide to the public realm of Kensal Canalside. Not all of the rail-related features may be appropriate to be retained, let alone made publicly accessible, but their significance and ability to tell part of the story of the site to future generations should not be overlooked as new, more detailed plans are devised for the land on which they are located.</p> <p>Kensal Green Cemetery and proposed bridge. The Committee is encouraged by the level of attention paid to the present and future relationship between Kensal Canalside and Kensal Green Cemetery. As a Grade I registered park, it is a heritage asset of the utmost significance. It does, nonetheless, note and share the concern expressed by at least one resident, quoted in SEA Appendix A, that the mooted pedestrian bridge from Kensal Canalside (Area 2) into the Cemetery, and the extra footfall it would bring, could be detrimental to the experience of the latter. Harm in</p>	<p>An extension to the conservation area is not currently planned for.</p> <p>As with above the addition of wording clarifying the importance of undesignated heritage assets has now been included.</p>
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	<p>historic environment terms need not be solely physical or visual in origin, as it can also derive from noise, such as may result from increased numbers of visitors. Turning an important historic burial place into something akin to a public park would not be a desirable outcome. It is to be hoped, therefore that alongside the ‘early engagement’ with the Canal and Rivers Trust to ensure compliance with its Code of Practice envisaged in the SPD (page 30), the plans for a new bridge are discussed with the management of the Kensal Green Cemetery at the earliest possible opportunity.</p> <p>Setting of Kensal Green Cemetery etc. The very extensive Views Study demonstrates the visual impact of future development of the Opportunity Area is a key concern, especially in relation to Kensal Green Cemetery. The current outline vision is for buildings of 4–20 storeys across the site, with small areas where towers of 20+ storeys may be permissible. This contrasts with what exists on the north side of the Cemetery along Harrow Road, where low-rise residential development predominates. It is important to highlight that the southern boundary of the Cemetery is more open (i.e. defined by a fence rather than high wall) making it more sensitive to changes to its setting. Given the incipient nature of the plans for Kensal Canalside, it is not surprising that nowhere in the Views Study is any visualisation provided depicting the possible future state of the view from a given location. Such visualisations can be immensely helpful for understanding the potential harm that would be caused to the setting, especially by development in Areas 1 and 2 of the Opportunity Area closest to the Cemetery and canal, it is very much to be hoped that these form part of the documents made available in the next phase or phases of the redevelopment proposals. A record of all surviving railway and tramway features should be made to show how any that are retained fitted into the site.</p>	<p>The SPD does highlight the importance of early engagement with the cemetery.</p> <p>The height map is indicative only and the accompanying text has been amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan.</p> <p>The views document sets out the locations where the relationship</p>
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			<p>between the existing townscape and new development on the KCOA is most critical.</p> <p>Noted.</p>
46	Steve Hoier, Portobello Business Centre	<p>PBC is responding to Consultation on the draft SPD of the Kensal Canalside Opportunity Area (KCOA): as an involved stakeholder with its office base of Canalside House in the KCOA, potentially requiring re-provision if this building needs to be included in a comprehensive redevelopment of the site ; and as an enterprise agency aiming to support business start ups and business development within this part of North Kensington , an emerging strategic section of its west central London operational zone.</p> <p>Our organisation has thus welcomed the opportunity to input to the earlier stages of consultation and now to comment on the draft SPD . It acknowledges the dedicated work of the RBKC Planning team to involve the local community and stakeholder organisations and to give this work the focus and priority needed to this, the largest regeneration area identified by RBKC .</p> <p>With our working location in the OA, PBC recognises that the site currently is a collection of some quite large land parcels and facilities</p>	<p>Noted</p> <p>Noted</p>

	<p>Understandably Old Oak Common interchange barely features in the SPD and its supporting technical appendices and working papers. There is a suggestion that the North Pole site may go forward later than the sites on the north of the railway corridor. Is that because it is likely to be used as a worksite for the substantial quantum of railway engineering RBKC's Director of Environment in 2017 advised would be needed in the rail corridor right by it to enable the links to be constructed for the 12 surface platforms at OOC for extra Great Western and new Elizabeth Line services ?</p> <p>Phased development of KCOA would not be surprising in any event. Yet the North Pole site is crucial to reaching the target for affordable housing with the indicative target of 50% on public land and for the siting of the podium for the trans railway bridge. A new road through Webb Close and into Scrubs Lane is currently described as aspirational. With the OOC development is the need for the new road not increased ?</p> <p>Surely, however, there is a substantive change of context with the commitment to Old Oak Common interchange station and surrounding development – a new piece of London with potentially up to 60k jobs when fully built out? The OA stretches east-west towards Scrubs Lane and faces OOC. Already there is evidence of OOC regeneration ripple effects along Scrubs Lane . The SPD technical papers suggest the economics of funding the infrastructure needed for the KCOA are marginal. Is it not possible positive ripple effects from OOC will improve the KCOA site values with beneficial effects on the ability to fund infrastructure.?</p> <p>The indicative timings in the SPD focus on a Vision for 2028 with an initial year of 2024. Perhaps rail works may delay the start year to 2025 but PBC joins with other local stakeholders in hoping the ambitious and exciting new Vision for KCOA can be delivered in the medium term.</p>	<p>This is owing to the landowners wanting to dispose of the land prior to development and a number of steps need to happen before that is possible. It is still expected to come forward within the 6-10 year plan period.</p> <p>Agreed</p> <p>This is aspirational owing to it sitting within a different local planning authority. However, OPDC and RBKC guidance align in this respect.</p>
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			<p>It is possible. A viability assessment will be expected of any development that comes forward which includes up to date values.</p> <p>Noted.</p>
47	<p>St Quintin and Woodlands Neighbourhood Forum</p> <p>St Helens Residents Association</p>	<p>We are a neighbourhood forum and residents association of 380 residents and businesses. The forum and neighbourhood boundary area were designated by RBKC in 2013 and cover the area to the immediate south-west of the Kensal Canalside Opportunity Area.</p> <p>Given the proximity of the Opportunity Area to our neighbourhood, we have followed closely the progress of plans for Kensal Canalside and commented on the 2012 Issues and Options document.</p> <p>We are also aware of a series of studies on the Opportunity Area which have been undertaken since 2008, including:</p> <ul style="list-style-type: none"> • Kevin Murray Kensal Canalside Pre-Feasibility Study 2008 • RBKC 2012 Issues and Options • The Strategic Environmental Assessment Report undertaken for RBKC by LUC in 2019 <p>We have seen references to a £1m research project funded by the Mayor's Good Growth Fund and involving We Made That working with Hatch Regeneris, PRD, 3Space, Graham Harrington Planning Advice and Stockdale on a spatial framework for the expansion of Kensal's creative economy through the delivery of new development at the KCOA. But have not been able to track down the product of this research.</p> <p>All these studies recognise the serious physical constraints of the site. The most significant of these is that road access is limited to a single</p>	<p>3500 homes is a minimum in the Local Plan</p> <p>This project is ongoing. Part of the work is included as the workspace strategy for the SPD.</p>

	<p>entrance/exit point off Ladbroke Grove. The railway lines bisecting the northern and southern parts of the site are very wide, making the spanning of these a major and expensive project – even for pedestrian/cycle traffic. The canal bounds the northern edge of the site with Kensal Cemetery on its northern bank.</p> <p>These physical features explain why a major brownfield site has lain undeveloped for so long in North Kensington. This scenario is the same as for several large sites in the adjoining Old Oak and Park Royal Opportunity area to the west, on which the StQW Forum has been commenting in consultations (and in representation on planning applications) since 2015. This response follows a presentation and discussion on the Draft SPD at an open meeting (on Zoom) for our members. Ove 60 people logged in. We conducted a Zoom poll with a series of questions, and responses to these are shown in the ‘boxes’ in this consultation response.</p> <p>Timing of regeneration The Kensal and Old Oak sites are now at a stage where masterplans for major sites are coming forward on similar timescales. The OPDC has yet to get an adopted Local Plan into place (4.5 years late, on its original timetable). Proposals for Kensal Canalside have taken many years to reach the stage when outline applications due to be submitted by late 2021. This is earlier than local residents expected (see below in relation to the EIP on the Borough’s Local Plan Partial Review. A new London Plan is in place from March 2021, setting a sub-regional planning context for the OPDC and Kensal areas.</p> <p>It is ironic (and a source of concern to local people) that this moment has been reached in 2021 – a pandemic year when a fundamental re-appraisal of the way that London functions as a city has only just begun. Results of the 2021 Census may tell us much.</p>	<p>Noted.</p>
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	<p><i>In response to the question do you agree that RBKC should look ahead to London's future housing needs? 82% of those voting answered 'yes'.</i></p> <p>Detailed proposals for Kensal Canalside and Old Oak are due to be decided by year end. These plans have been formulated on a set of demographic and 'work/home/commute' assumptions and development industry norms which may prove to be seriously adrift by the time these sites are built out. The future of this part of London risks being decided (for the next 20-30 years) on the basis of planning policies from a pre-Covid era of London's housing needs and travel-to-work patterns, as compared with what may apply in the future.</p> <p>We accept that a planning authority has no choice but to decide planning applications which are submitted. We can see that RBKC has found itself in a position where the MHCLG 'tilted balance' applies, and a tilt towards the interests of developers is a consequence. But this does not feel a sensible time for these long terms planning decisions for Kensal to be made. We will make this clear in our dealings with the developers involved at Kensal.</p> <p>This is not NIMBYISM on our part, or opposition to any change or new development. The Canalside area needs redevelopment.</p> <p>It has not gone unnoticed that fact that the biggest decision of all, in terms of how the area will be designed and developed, seems already to have been made via a process with no apparent public consultation or involvement. This is the increase in the potential development capacity of the Opportunity Area from 3,500 to 5,000 new homes.</p> <p>This was not a proposal made during consultation on the Borough's 2019 Local Plan or at its 'Examination in Public (EIP)'. It was not a proposal put forward in consultation on the New London Plan (now in force as from</p>	<p>Noted. Applications for development proposals can be submitted to the Council at any time.</p> <p>This is subject to valid planning applications being submitted.</p> <p>Noted. The emerging Local Plan Review Issues and Options paper is due to be consulted on in the Autumn.</p> <p>Noted.</p> <p>The SPD simply tests 3 capacity scenarios starting at the minimum allocation as set out in the Local Plan to understand the viability impacts and affordable housing implications of delivering above the minimum number</p>
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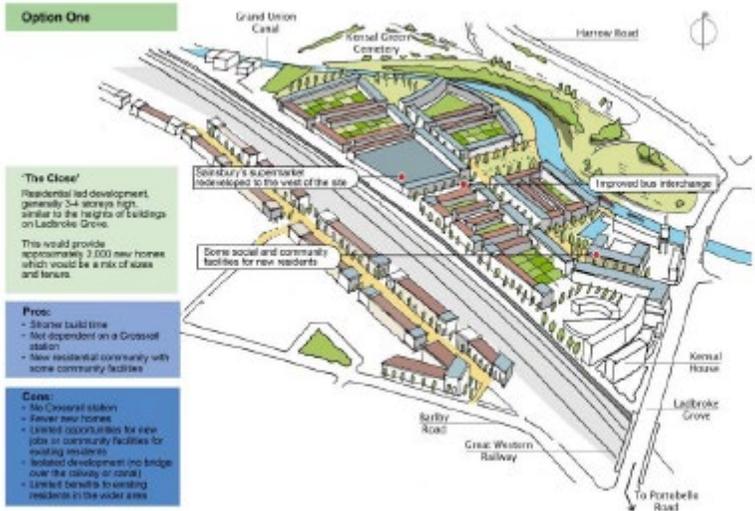
	<p>March 2021) nor one aired at the EIP on the London Plan. It is not clear from where it has much increased housing figure has come, other than from current pressures on RBKC to deliver a specified target number. A combination of these pressures on the Council and developer aspirations in confidential pre-application discussions has clearly had an effect. But this key part of the planning process has been far from transparent and evident to local people.</p> <p>Context of the London Plan</p> <p>The RBKC Draft SPD starts (paragraph 1.1) with what has become a familiar refrain in planning documents for our city: London needs at least 66,000 new homes in each year for at least 20 years if the needs of Londoners are to be met. The justification for this figure continues to be argued over, as does its realism.</p> <p>The 2021 London Plan sets down a housing target for each of the 48 Mayoral Opportunity Areas. Most of these were carried forward from the 2016 London Plan unchanged. These often referred to (as is the case with the Kensal Draft SPD at 1.1) as ‘minimum targets’.</p> <p>This description is not accurate. The relevant London Plan Table 2.1 shows these figures as ‘indicative targets’. The accompanying text states clearly When developing policies for Development Plans, allocations and frameworks, boroughs should use the indicative capacity figures as a starting point, to be tested through the assessment process. (our emphasis).</p> <p>This final wording included in the 2021 London Plan resulted from organisations giving evidence at the London Plan EIP, arguing that these 2016 targets for Opportunity Areas had no solid evidence base and were in many cases far too optimistic. The Mayor accepted modifications on how these targets should be described in the London Plan.</p>	<p>of homes. A significant amount of community engagement was undertaken in the development of the SPD as set out in the consultation statement.</p> <p>Noted.</p>
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	<p>Hence the London Plan sets 3,500 new housing units as an indicative target, to be tested. Proposals which emerged at a lower figure would be in conformity with the 2021 London Plan.</p> <p>It is important that the final version of the SPD makes this context clear. We do not wish to see a scenario further down the line with RBKC officers and councillors telling the public that Kensal Canalside must be developed at very high densities and laying responsibility for the outcome at the door of the Mayor of London.</p> <p>Context of the RBKC 2019 Local Plan</p> <p>In relation to Kensal Canalside, the adopted Local Plan states at 5.7.1 Kensal Canalside is the last remaining large brownfield site in the borough. It adjoins the Old Oak and Park Royal Opportunity Area to the west and has the potential to and act as a catalyst for the regeneration of the whole of this part of northwest central London as it will be developed before Old Oak and Park Royal.</p> <p>We see no reason why new development at Kensal Canalside will act as a ‘catalyst’ for regeneration in a wider area. While it is true that much of the regeneration at Old Oak will not take place until the late 2020s, OPDC has already granted planning consents to 4 major developments in Scrubs Lane. The fact that none of these has yet started construction confirms our view that similar claims by OPDC of the ‘catalyst’ effect of a HS2/Crossrail/GWR station at Old Oak Common Lane are overstated.</p> <p>This new station and Old Oak Common will have no vehicle access at its eastern end, following OPDC’s ‘change of direction’ and abandonment of plans for Old Oak North in 2019. Plans for an additional Crossrail/Queen Elizabeth Line station at Kensal Canalside appear to have minimal likelihood of being implemented. The Draft SPD continues to propose</p>	<p>Noted, however the allocation in the Local Plan does set 3,500 as a minimum.</p>
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	<p>safeguarding of a station site. Is it fair to continue to float this possibility in front of residents?</p> <p>The Local Plan ‘vision’ for Kensal in 2028 as a thriving, well-connected community raises what we see as similarly unrealistic expectations. A similar situation arises with OPDC promises in its Post Submission Modified Draft Local Plan (currently being consulted on) which promotes Scrubs Lane as a ‘well-connected place in its own right’.</p> <p>It is not helpful for local people to be offered a menu of new ‘thriving’ communities in circumstances where:</p> <ul style="list-style-type: none"> • Existing inadequate public transport infrastructure and the main road network on both sides of the West London Line at Scrubs Lane and at Kensal is not going to change significantly. No new Overground station at Hythe Road. OOC station with no vehicle accessibility and poor pedestrian/cycle access. More buses as the only means of improving poor PTAL levels. Traffic congestion on the rise as a result of increasing public reliance on ‘e-fulfilment’ and deliveries, even when new development is in theory ‘car-free’. • the pace at which new housing on all these sites to west and east of the West London Line will be built out remains in the hands of the developers involved and subject to continued fluctuations in a London housing market which is likely to remain unstable for years to come. <p>We therefore make a plea to both RBKC and to the developers at Kensal Canalside to tone down the hype, and to be honest with local people about the major site constraints and high costs of site preparation and infrastructure. With no Government funding available, it seems evident that financial viability is already driving density levels at Kensal. In turn</p>	<p>Noted.</p> <p>The SPD confirms at 7.3 that an Elizabeth Line station has not yet been proven feasible and no further feasibility work is anticipated within the lifetime of the Local Plan. Transport for London and Network Rail have confirmed that for the foreseeable future they will be concentrating on nationally significant infrastructure projects. However, the SPD safeguards the potential location of a station here to ensure that opportunities in the longer term are optimised.</p>
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		<p>density is driving development towards an inappropriate and unwelcome building typology.</p> <p>Some households (mainly younger and childless) are fine with high rise residential towers. But a combination of lockdown in small flats where windows barely open, queuing for lifts with suddenly limited capacity, the cladding scandal and concerns on building safety have yet to play out fully in terms of the housing market.</p> <p>The public increasingly do not wish to live in, or view from open spaces such as Wormwood Scrubs, Little Wormwood Scrubs, and the Oxford Gardens Conservation Area, the growing number of towers appearing in this part of London.</p> <p>Central Government has begun to recognise this shift in public attitude, in the new National Model Design Code and the Secretary of State's December 2020 intervention on London Plan Policy D9 on tall buildings. After decade in which RBKC has been the one and only planning authority in north west London to resist tall buildings, and at a moment when 'peak tall building' may have been reached (as happened in 1968 on the 1950s/60s wave) it is doubly depressing to see the Council publish a SPD that includes section 6.2 in its present form (see further below).</p> <p>Site Allocation Policy CA1 in the 2019 Local Plan states that the Council will allocate development on the site to deliver 3,500 housing units Principle g) within the policy refers to high density housing, but there are no policy statements within CA1 referring to tall buildings. Principle m) commits to providing a suitable setting for the designated heritage assets (Kensal Cemetery).</p>	<p>The SPD is clear that the site constraints and infrastructure requirements have a significant impact on viability of the site.</p> <p>The SPD sets out the Council's approach to ensuring the optimum delivery of high quality affordable homes given the housing needs of the Borough.</p> <p>Noted. The SPD, in line with Development Plan Policies aims to deliver a range of homes to meet the housing needs of the borough.</p>
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	<p>At present, we do not see how the SPD, in its final form, can be used as a vehicle to introduce policy change in the form of significant increase from 3,500 units to anything as high as 5,000 units. The 3,500 is an indicative and untested figure in the London Plan, while treated as a minimum on the RBKC Local Plan.</p> <p>Secondly, we do not see how section 6.2 of the SPD can be in general conformity with the modified Policy D9 in the London Plan. This point is considered further in our specific comments on the Tall</p> <p>Building section of the Draft SPD (see below). Development capacity at Kensal Canalside The KCOA was identified by the Greater London Authority (GLA) as an Opportunity Area (OA) in 2009. At the time the site was earmarked to deliver 1,000 jobs and 2,000 homes (as a minimum) on a site of 20 ha. (the site is now defined as 15 hectares in the Draft SPD) The 2012 RBKC Issues and Options paper on Kensal Canalside identified 3 options. Option 1 of these was the only one which did not include a Crossrail station (i.e. the position as at 2021. This 2012 option provided for 'approximately 2,000 new homes' with an image as below.</p>	<p>The height map is indicative only and the accompanying text has been amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan.</p> <p>CH2 has been amended to ensure alignment with the NPPF and Development Plan Policies.</p>
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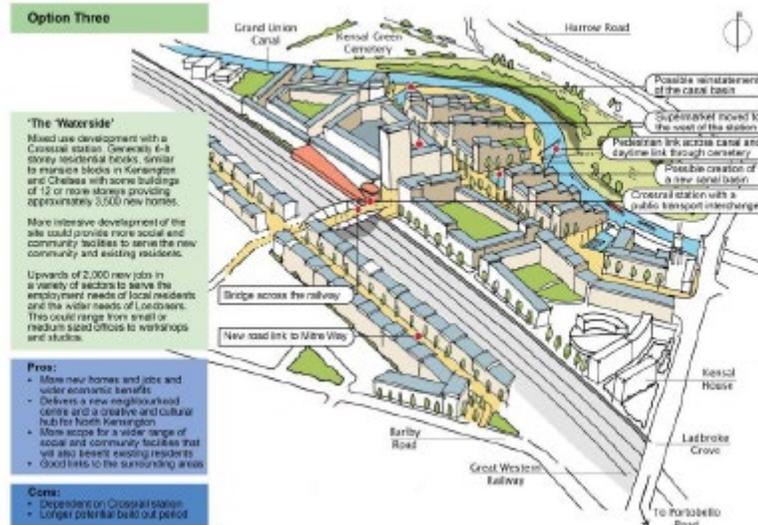


Following the 'issues and options' consultation the RBKC Consolidated Local Plan (2015) subsequently moved on from the GLA allocation to suggest that the site should provide upwards of 2,500 new dwellings. The September 2019 Strategic Environmental Assessment prepared for the Council says at 1.8 We understand that the masterplan that will inform the draft SPD will take this figure as a baseline and will also consider options for 4,200 and 5,000 new homes. We do not understand what 'masterplan' is being referred to here? Prepared by whom? Such a housing target was not referred to at the hearings on the RBKC Local Plan held in February and March 2018. The Inspector's report on the Local Plan Partial Review includes clear analysis and comments on Kensal Canalside. After considering the constraints of the site the Inspector concludes at his paragraph 40. However, the KCOA site is not scheduled to come forward in the first 5 years of the plan period and therefore time has been allowed for key decisions on the site infrastructure to be reached. Based on the evidence

	<p>submitted there is a reasonable prospect that the site is developable from year 6 onwards for the quanta of development proposed. But modifications are required, to allow for an alternative delivery strategy to be brought forward if the railway station is not feasible. I note the preference of the Council and the landowners for this to be brought forward through a Supplementary Planning Document (SPD) for the site and the suggested alterations to the proposed MMs to allow for this. However, given the strategic importance of the site to the borough's housing land supply and the London Plan housing target, any revised capacity and infrastructure under a Plan B should be confirmed through a review of the Local Plan (our emphasis)</p> <p>'The first five years of the plan period' cover 2018-2028. We fully support the view of the Inspector that 'any revised capacity and infrastructure under a Plan B for Kensal Canalside should be confirmed through a review of the Local Plan'. Such a review is in progress, while remaining at an early stage. Plan B (with no Crossrail station) is now the realistic context for the Kensal Canalside Opportunity Area.</p> <p>As and when outline applications from developers surface in late 2021 we will be making the point that these are premature taking into account the Inspector's comments above. There are also further grounds for refusal of such applications until a new Local Plan is in place (see below on Tall Buildings)</p> <p>The 2012 Issue and Options paper also included an 'Option 3' which assumed 3,500 new housing units built around a Crossrail station as the commercial focus of the area and a major new public transport link. The visual image used to illustrate this option at the time was included in slides shown to our AGM on May 13th 2021.</p> <p>The reaction was one of 'more than enough'. This was at the level of 3,500 new homes rather than 4,200 or 5,000. When followed up with a Zoom poll the response was as below.</p>	<p>This refers to a general site plan used for capacity testing in the associated capacity Scenarios document. This is set out in the methodology at 1.7.</p>
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In response to the question do you agree with the statement Increase from 3,500 new homes to 5,000 is too great, the response rate for 'yes' was 84%.

Option Three: 'Waterside' Large scale residential, business, leisure and retail scheme capitalising on a new Crossrail station.



Density at Kensal Canalside

The Draft SPD notes that The scale and density of the development required at Kensal Canalside will be a step change from the existing pattern of development in much of the Borough.

No figures are given on the expected net densities that will result from targets ranging from 3,500 to 5,000 new housing units. While former 2016 London Plan Policy 3.2 and the 'density matrix' have disappeared from the 2021 London Plan, net density levels remain one of the basic measures available to the public in assessing the potential impact of site allocations and major development proposals.

The Council understand that a change to the minimum allocation of 3500 homes and infrastructure as set out in the Local Plan would need to be confirmed through a review of the Local Plan. However, the SPD does not propose a change to the minimum housing number allocated in the Local Plan.

Noted.

Noted.

	<p>Policy D1 of the London Plan states Boroughs should undertake area assessments to define the characteristics, qualities and value of different places within the plan area to develop an understanding of different areas' capacity for growth. Area assessments should cover the elements listed below:</p> <p>3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density) (our emphasis)</p> <p>We therefore ask that a final version of the SPD includes information on expected net densities across different part of the Opportunity Area.</p> <p>The StQW Forum has looked back at density levels at which RBKC has designed schemes for its housing estates, or when undertaking renewal of existing estates in past decades. Density levels once considered appropriate for housing in the borough have moved steadily upwards. The Swinbrook development was designed around 1980 to contain 158 dwellings on 7.16 hectares at a density level of 92 persons per acre. This equates to roughly 97 habitable rooms/hectare (not even dwellings per hectare) on a large site half the size of Kensal Canalside.</p> <p>Phases 1 and 2 of the Wornington Estate (Phase 1 having won awards) we consider to be good examples of RBKC led redevelopment.</p> <p>Although the former Density Matrix has not been carried forward into the 2021 London Plan (and replaced by the Plan's 'design led approach') London Plan Policy D2 requires that densities be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services). PTAL levels and access to some services will continue to be poor at Kensal Canalside. Policy D3 echoes this in stating Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling...'. </p>	<p>A Baseline assessment has been included as a background document to the SPD. However, the site allocation</p>
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	<p>At the first of the Q&A sessions given online by the 'Project Flourish' team (Ballymore and Sainsburys) we asked what density ranges were being used for master planning. No reply was given at the time, but a subsequent email has explained We are currently testing approximately 360-400/ha across the site. As an average net density, we believe this to be higher than for RBKC estate renewal schemes at Treverton and at Wornington Phase 3.</p> <p>The London Plan defines schemes at densities of 350 dph or more as higher density residential developments (page 120 footnote). Such schemes are subject to additional requirements for on-going sustainability in terms of servicing, maintenance and management (including service charges). This is one of many reasons why the Draft SPD needs to be explicit in informing the public on expected density levels, in advance of outline applications being submitted.</p> <p>Tall Buildings</p> <p>Section 6.2 deals with issues of Height and Massing. CH3 states Development must seek to deliver:</p> <ul style="list-style-type: none"> • A development that varies in height across the site in response to context, environmental constraints and functionality and is led by a clear height and massing strategy. <p>This does not make clear who is meant to be defining this strategy, the Borough or developers?</p> <p>The Draft SPD does not define a clear strategy. The map on page 75 refers in boxed text to a General Height Strategy 4-20 storeys. Shading of parts of the map give an indication of those parts of the Opportunity Area sensitive to tall buildings.</p> <p>Four areas on the map are identified as Areas where taller buildings might be acceptable outside of the general height strategy. There is a reference</p>	<p>in the Local Plan is for a minimum of 3500 new homes.</p> <p>Net densities across the site will likely vary according to plot given the requirements of the masterplan to ensure development is brought forward via a height strategy that responds to context. environmental constraints and functionality.</p> <p>The SPD promotes increased connectivity into and throughout the SPD area emphasising the importance of bridge connections and bus improvements. Text has been added to</p>
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	<p>to Trellick Tower as a local landmark without mentioning its height (31 storeys).</p> <p>In December 2020 the Secretary of State intervened on the subject of Tall Buildings in London and directed the Mayor to make a modification to London Plan Policy D9. The impact and legal significance of this modification remains much debated.</p> <p>As of now, we have doubts whether planning applications at Kensal Canalside which include a number of tall buildings (35m being the current threshold for referral to the Mayor) could be said to conform with the modified London Plan Policy D9. The criteria for a 'suitable location' go beyond the traditional measures on views and harm to heritage assets. Assessment and justification against a set of 'functional impacts' are also required.</p> <p>More importantly such justification of 'suitability' must be demonstrated in Borough's Local Plan (as we understand). We do not see that attempts at such justification in a SDP will be sufficient, when a series of policies in the RBKC Local Plan clearly resist building heights out of context with neighbouring buildings and when the Local Plan policies for Kensal Canalside do not refer to the area's suitability for tall buildings.</p> <p>This is a further reason why we feel that regeneration at Kensal Canalside must await the next iteration of the Borough's Local Plan – as was expected by the Planning Inspector when he reached conclusions on the soundness of the 2018 Local Plan Partial Review.</p> <p>We are aware that the interpretation of modified London Plan Policy D9 is now the subject of a judicial review application in a West London Borough. We await the emergence of more legal certainty on this subject.</p> <p>Transport and Connections</p> <p>The vision for Kensal in 2028 envisages that New connections will knit the new neighbourhood into the existing city fabric and link westwards to Scrubs Lane and Old Oak Park Royal."</p>	<p>clarify contributions will be sought to deliver improvements to the underground network to ensure that extra capacity is met.</p> <p>Noted.</p> <p>Wording has been amended as stated above to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan. The developers are required to develop a height strategy in line with Policy D9.</p> <p>The map is indicative.</p>
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	<p>Local residents, including members of our neighbourhood forum, would welcome the arrival of new connections, particularly those which improve connectivity between Kensal and Scrubs Lane (a location for which OPDC is currently the planning authority).</p> <p>But we are sceptical. A pedestrian/cycle underpass beneath the West London Line was promised a decade ago but has yet to materialise. North Pole Road remains a major pinchpoint as the only vehicle entrance/exit to North Kensington beneath a rail line which has separated LBHF from RBKC since the last 19th century.</p> <p>The OPDC PSMDLP includes maps showing a continuous 'Wormwood Scrubs Street' linking Ladbrooke Road to Old Oak Common Lane across the northern boundary of Wormwood Scrubs. On examination of the detail the western section of this route is a 'potential' project phased for 21+ years in the future.</p> <p>The eastern section, which may or may not achieve a link though to Kensal Canalside is OPDC TV4 Delivery of new Wormwood Scrubs Street East of Scrubs Lane, including improved connections to Mitre Way. This is an unfunded and uncommitted project phased for 0-10 years,</p> <p>The proposed pedestrian/cycle bridge, spanning the wide expanse of rail tracks between the north and southern parts of the Canalside Opportunity Area, would be of some help. But the Draft SPD at present is encouraging and supporting 'high density residential development' on a 15 hectare site which remains seriously unsuited to development of the scale and density proposed.</p> <p>We think this situation has arisen from over a decade in which a succession of studies and initial consultations have led planning officers and developers to see as 'acceptable' a set of potential masterplans from developers which would have been swiftly set aside -- were the site and its constraints looked at afresh from basic spatial planning principles. The</p>	<p>Wording noted to reflect Policy D9 of the London Plan.</p>
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	<p>idea that a Crossrail station might possibly serve the site has played too large a part in this sequence of planning proposals.</p> <p>In terms of public transport, the Draft SPD shows up the reliance on improved bus routes. We ask that the final SPD includes PTAL maps showing levels of public transport access at each end of the site as of 2021, and as predicted for 2028. Those living and working in the area, or considering relocating to Kensal Canalside need a more detailed and transparent benchmark of all parts of what is a large set of sites.</p> <p>We support the mention of the Grand Union Canal as a possible public transport route (an option also considered by City & Docklands at Scrubs Lane. The canal towpath provides an important east west rout for cyclists but is already heavily used as peak times to the detriment of pedestrians. Paragraph 4.2 says The street network should give thought to what measures could be implemented to prevent the streets being overrun with taxi's and delivery vans in what will be a largely car free development. We say, best of luck with that, in 2021 London.</p> <p>We have confined our response to the Draft SPD to what we see as the fundamental issues involved in planning the future of Kensal Canalside. There are many proposals in the document, on greening, open space, and sustainability which we support.</p> <p>For a final version of the SPD, these are the main points which we have flagged up above.</p> <ul style="list-style-type: none"> • We think the timing of outline applications is premature. As pointed out the Inspector of the 2019 RBKC Local Plan, major issues of access to the Canalside site and new infrastructure requirements remain unresolved – both in the OPDC area to the west at the KCOA itself. • The reasons why a 3,500 'indicative' housing target in the London Plan has become a potential 4,200 or 5,000 site allocation figure are not clear from the SPD. The background to this major change is not transparent. 	<p>Noted.</p> <p>Noted.</p> <p>The SPD promotes a largely car free development. New text has been added to clarify that a local network traffic model created for the Council in conjunction with TFL has been created to assess any forthcoming applications.</p> <p>The SPD identifies a series of infrastructure requirements necessary to deliver the vision for the Opportunity Area.</p>
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		<ul style="list-style-type: none"> • We are not clear how such a significant policy change can be introduced via the vehicle of a Supplementary Planning Document? • We would like to know what is being referred to as ‘the masterplan’ in the September 2019 SEA report from LUC? • We share the view of the Inspector of the RBKC Local Plan that given the strategic importance of the site to the borough’s housing land supply and the London Plan housing target, any revised capacity and infrastructure under a Plan B should be confirmed through a review of the Local Plan. • We ask that a final version of the SPD includes information on expected net density levels across different parts of the Opportunity Area. • We ask that the final SPD is explicit in informing the public on expected density levels, in advance of outline applications being submitted. • On Tall Buildings, we do not see that a SPD can provide the justification of the suitability of locations for tall buildings given the absence of relevant supporting policy in the Local Plan. <ul style="list-style-type: none"> • The SPD does not take into account emerging Government policy on the National Model Design Code (e.g. its density examples) and on tall buildings in London (London Plan Policy D9) • More clarity is needed in the SPD on when and how any road link can be achieved between Kensal Canalside and Scrubs Lane, and how this will be financed? 	<p>To ensure the deliverability of high quality new homes in the borough in line with the vision for the Opportunity Area the site’s constraints must be taken into consideration.</p> <p>As above.</p> <p>The existing site PTAL levels are shown in the baseline document. The SPD sets out the ambition to deliver a well-connected development that optimises opportunities to increase public transport use and active travel. Future PTAL will be one tool that the Council uses to assess future planning applications when submitted.</p> <p>Noted. This aligns with Development Plan Policies.</p>
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			<p>Noted.</p> <p>Noted.</p> <p>3,500 new homes is a minimum allocation in the RBKC Local Plan.</p> <p>It is not considered that the SPD introduces a policy change.</p> <p>The plan identified in the capacity scenarios document</p> <p>As above, the housing allocation (a minimum) and infrastructure is not being revised.</p> <p>The density across the site is likely to vary in response to a masterplan that meets the objectives of the SPD and as</p>
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			<p>such this is not considered useful at this stage.</p> <p>Text has been amended to align with Policy D9 of the London Plan, 2021</p> <p>The importance of a design code for the comprehensive development of the site is included within the SPD and the tall buildings policy has been addressed in changes to the text.</p> <p>This is currently set out as aspirational, but the Council are working with the landowners and OPDC to bring this forward.</p>
48	CCG	<p>Thank you for the opportunity to comment on the draft Opportunity Area SPD. The CCG has been working with the Council to identify the likely healthcare requirements and the options for additional provision in the area.</p> <p>We note that the draft SPD has a policy statement on ‘primary healthcare’ (LWV8) which states that “Where necessary, healthcare facilities or equivalent financial contributions towards local hub expansions that meets the need of the increased population”. This is supported as the area is exempt from the borough CIL so s106 planning obligations (in-kind and/or financial contributions) are essential to help deliver the additional</p>	Noted

		<p>infrastructure needed. It is expected that additional provision could be provided in the form of a new facility and/or additional capacity in existing premises, and the CCG would welcome the opportunity for further discussions to ensure necessary infrastructure is provided at the appropriate time and is affordable.</p> <p>We support the proposal to develop a new north-south pedestrian and cycling bridge across the Great Western Railway (CO5). This will connect the opportunity area to the surrounding area to the south and will provide access to existing healthcare services. This includes St Charles Centre for Health and Wellbeing.</p> <p>We note that the draft SPD is accompanied by a Development Infrastructure Funding Study (DIFS) Refresh report (February 2021). The CCG provided comments on the original DIFS report in November 2019 including outputs from the HUDU Model based on the three growth scenarios.</p> <p>The updated DIFS provides a partial review of social infrastructure, including primary healthcare. Table 3.10 identifies primary healthcare costs which, at £5,691,000, is the same for each growth scenario (ranging between 3,500 homes – 5,000 new homes). This assumes that there would be the same level of provision – a GP practice of 6 GPs by 2032 for each scenario. As no floor space figures are provided it is difficult to identify how the cost figure is derived. We would welcome the opportunity to update the analysis carried out in 2019 using the housing supply figures in Appendix D of the revised DIFS.</p> <p>The previous DIFS expected a range of provision by each growth scenario, which could be delivered through extensions to existing practices in the area. It is unlikely that the additional capacity will be provided solely from</p>	<p>Noted</p> <p>Noted</p> <p>In the absence of information from HUDU generic assumptions were made in relation to this aspect following discussion with the CCG. Whilst the DIF is used as a high level document any application will need to address healthcare need that arises from the proposed development in conjunction with the Council and CCG. The Council would welcome further information on a Locality Study identifying future</p>
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	<p>one new facility as services are increasingly being delivered across a network of GP practices and the requirement will change over time given the different demand scenarios and the phasing of housing growth. The model of primary care for this locality will also focus on maximising the utilisation of St Charles Centre for Health & Wellbeing as a major asset for the healthcare system. There are significant opportunities on the site to provide an integrated are solution to supporting this additional requirement. We would therefore anticipate that this would be the main focus for additional investment.</p> <p>Appendix D of the revised DIFS anticipates that the health facility would be built by a developer and funded through ‘mainstream’ NHS funding on a ‘lease back’ basis. It suggests that initially s106 could be used to fund 50% of the capital costs but this would be repaid to the developer overtime by the NHS. As such the provision would be ‘cost neutral to the developer’. It is unclear how this would work in practice and whether this represents a planning obligation or is a commercial arrangement, with the NHS effectively paying a market rent on a shell and core space. For other social infrastructure, for example education, leisure and sports and community facilities there is the expectation that developers would contribute to the costs of provision with no requirement for the contribution to be paid back. Should the NHS and the Council seek support for shell and core provision this would need to be based on a developer contribution, without any payback in line with other social infrastructure beneficiaries. We would therefore welcome further discussions on this matter.</p>	<p>needs and opportunities in the north of the borough.</p> <p>Noted.</p> <p>Noted. The DIFS, in the absence of more robust data used generic assumptions and as such the provision of any healthcare would need to be developed closely with both The Council and NHS.</p>
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49	General Cemetery Company	<p>Thank you for the opportunity to provide comments on the Kensal Canalside SPD and for an extension until 31st May in which to provide these comments.</p> <p>Introduction</p> <p>The General Cemetery Company was established by an Act of Parliament in 1832 and has privately operated Kensal Green Cemetery since 1833 when the first burial took place. West London Crematorium established within the boundary of the Cemetery also offers a place of cremation. The Cemetery is a considerable heritage asset:</p> <ul style="list-style-type: none"> • It is the oldest (and some might say) the most prestigious of the 'magnificent seven' cemeteries in London; • The Anglican Chapel is Grade I listed building; • It has Twelve Grade II* listed structures / monuments; • It has 146 Grade II listed structures / monuments; • Importantly, the Cemetery itself is listed Grade I on the Register of Parks and Gardens. <p>The SPD makes various references acknowledging the importance of the Cemetery as a heritage asset and 'a tranquil green open space' adjoining the proposed development.</p> <p>The Board of the Cemetery are cautiously supportive of the Kensal Canalside development provided planners and developers take the opportunity to actively improve Cemetery infrastructure and make a substantial contribution towards protecting and restoring national heritage at risk and maintaining the green lung environment which supports a wide variety of fauna and flora.</p> <p>Key Concerns</p>	<p>Noted.</p> <p>Noted.</p>
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	<p>1. Route through Cemetery, Opening/Closing Times and Cemetery Security The SPD makes mention of a pedestrian and cycle bridge(s?) across the canal to accommodate additional traffic generated by the development and a pathway through the Cemetery to provide quicker access to Kensal Green station. Assuming such a pathway were agreed, Cemetery opening closing times would have to be extended to accommodate user needs and will also impact Cemetery security.</p> <p>2. Proposed pedestrian bridge across the canal Details of the plan for a bridge or bridges across the canal are sketchy as is where planned access(es) to the Cemetery might be. Access to the Cemetery from the bridge landing point(s) will have to be subordinate to the location of existing graves.</p> <p>3. Heritage Assets Within the SPD, CH2 specifies "Development that responds to and does not cause unacceptable harm to the significance of the heritage assets". This specification is far too open to interpretation as is who might be qualified to and have the right to make such decisions as a result of the proposed development.</p> <p>4. Health and Safety Increased human traffic in the Cemetery as a direct result of the Kensal Canalside development will bring increased risk of the public coming into contact with buildings and memorials that are in need of repair that could be potentially dangerous. This makes the requirement for an extensive programme of repair to heritage assets a very high priority including repair to the grade 11 listed Cemetery wall for security reasons.</p>	<p>Noted. The SPD sets out that opportunities for connection improvements would be created by bridging the canal during cemetery opening hours. Opening and closing times are not set out in the SPD but would need to be established prior to the development of any bridge.</p> <p>Noted.</p> <p>Noted. CH2 has been amended to ensure alignment with the NPPF.</p> <p>Text has been added to the SPD that notes that the route will need to ensure safe access and should respond to the special historic interest of the</p>
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	<p>Aligned with Cemetery Opening/Closing times in point 1 above will be the issue of visitors being in the Cemetery after nightfall, especially during winter, which will necessarily increase risk to personal safety.</p> <p>5. Welfare of families of deceased interred in the Cemetery The Cemetery remains a working cemetery and the proposed development will clearly impact those attending to mourn loved ones and enjoy quiet contemplation. The impact will initially be felt by noise created by construction, then by a changing skyline to the south blocking out views and finally by an increased footfall of people using the Cemetery to access transport or shopping and/or for recreational purposes.</p> <p>6. Views The routes through the Cemetery in the Dissenter's section, and along the Central Avenue enjoy clear views across south London which are important to visitor experience when attending funerals or simply visiting the Cemetery. The massing of the proposed development plus 'landmark' tall buildings referred to in the SPD would inevitably have a negative effect as the skyline will be dramatically altered.</p> <p>7. Environmental Impact</p> <ul style="list-style-type: none"> • Construction noise for an extended period during the development phase of Kensal Canalside will inevitably have adverse effects for the previously mentioned tranquil space that is Kensal Green Cemetery. In addition, this noise will adversely affect visitors to the Cemetery and fauna which have their habitat in the Cemetery. 	<p>cemetery. The terms of use of any such route would need to be agreed with the Cemetery Company.</p> <p>Detail on the significant number of monuments at risk in the cemetery has been noted in the SPD.</p> <p>Noted. A Heritage Impact Assessment has also been required of any application.</p> <p>The height map is indicative only and the accompanying text has been amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan.</p>
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	<ul style="list-style-type: none"> • Increased footfall within the Cemetery as a direct result of the development for commuter, shopper or leisure purposes will adversely affect the Cemetery environment and necessitate increased maintenance. • An assessment of the environmental impact of a Path Route through the Cemetery and possible Security Lighting required is not evident in the SPD. <p>8. Impact on revenue activities additional to the core business of the Cemetery and Crematorium.</p> <p>The Cemetery currently derives a significant ancillary income through the use of the Cemetery for film location purposes due to its heritage assets and park/garden atmosphere. The extent of development outlined in the SPD has the potential to substantially reduce these revenue opportunities due to the impact of noise during construction and a dramatically changed skyline to the south.</p> <p>On the other hand, should developers make a substantial contribution towards protecting and restoring heritage assets and facilitate infrastructure improvements which would benefit users of the Cemetery, an overall positive result might be achieved.</p> <p>9. On-going costs of maintaining proposed Cemetery accessibility.</p> <p>The SPD does not accommodate a long-term plan to address issues of on-going maintenance costs should a path route be established, the resultant flow-on necessitating early opening/late closing and increased staff numbers to provide maintenance to support a substantially increased footfall.</p> <p>10. Infrastructure to support increased usage of the Cemetery. Roads and Pathways</p>	<p>A construction Methodology Statement will be required in line with RBKC Local Plan requirements which will need to address the impacts of noise and vibration during construction.</p> <p>Noted.</p> <p>Specific detail of proposed lighting is not proposed as part of the SPD as this would be expected to come forward at planning application stage following. However, the importance of appropriate lighting in sensitive areas such as the canal and cemetery has been included.</p> <p>Specific mention is made to managing the impacts to biodiversity of any new route through the cemetery.</p> <p>Noted.</p>
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	<p>Some of the Cemetery's roads have been improved over recent years, but many are in a condition too poor to support increased traffic that could be expected as a of the Kensal Canalside Development. Early improvement to allow better access via the Victoria gate (near Kensal Green Station) and to a restored Anglican Chapel will be needed. Improvement of roads in the Cemetery would be a major improvement to the Cemetery and for the local community.</p> <p>If there were to be increased foot and bicycle traffic through the cemetery to provide easier access to Kensal Green Station, it would be necessary to ensure that there was sustainable provision to maintain this route and the surrounding roads into the future (see 9 above).</p> <p>Drainage There is poor drainage particularly in Winter months and in southern areas of the Cemetery. Should a path route go ahead, plans for all-weather access particularly in the area closest to the canal will need to take account of this.</p> <p>Toilet Facilities Toilet facilities are currently limited. They will need to be enhanced to accommodate anticipated footfall in the Cemetery.</p> <p>Conclusion In view of the above concerns, the SPD as it stands does not adequately address and provide solutions for the opportunity of a sustainable future by protecting and repairing the Heritage at Risk site that is Kensal Green Cemetery. The Board of General Cemetery Company therefore strongly encourages the SPD to be revised to take account of the concerns raised. Providing this is done, the Board will be amenable to this development if there is a benefit to the Cemetery which outweighs the negative effects</p>	<p>Noted.</p> <p>Amendments have been made to clarify that the submission of a Heritage Impact Assessment is required that ensures any long term mitigation and public benefit identified.</p> <p>Improvements to the cemetery path providing access in included in the estimated infrastructure costs set out in the Local Plan and DIFS.</p>
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		and is sustainable for the long-term future of the Cemetery and Crematorium.	<p>Noted.</p> <p>The SPD does not preclude this.</p> <p>A series of amendments have been made to the SPD as set out above that seek to address these concerns.</p>
50	Warrior Capital/ Portobello Group	<p>Land Uses</p> <ul style="list-style-type: none"> - The ambition to deliver the housing and employment targets in the KCOA is strongly supported. - Consideration should however be given to the impact of the development on the wider Kensal Employment Zone, and the balance of uses more widely within this area. - Policy should be informed by an underlying study on existing commercial markets in the area – in terms of supply and demand of offices, light industrial uses, other workspaces, retail and leisure. The SPD should be considered alongside a review of the Employment Zone policy in the Local Plan to ensure it is fit for purpose and reflecting current markets. The potential development of significant employment space within the OA could undermine existing or pipeline space in the wider Employment Zone. - The approach to targeting both new residential and new employment opportunities should potentially be extended across the Kensal Employment Zone. A ‘no net loss’ of commercial space policy could be 	<p>Noted.</p> <p>The SPD does not create new policy, but any application will be determined in accordance with the Development Plan Policies and any other material planning consideration. As such existing policies that seek to protect the Employment Zone are sufficient.</p> <p>Noted, new policy is not being created in the SPD. The emerging RBKC review of the Local Plan will gain in weight as it goes through the relevant process.</p> <p>Noted.</p>

	<p>considered – alongside a more nuanced policy approach where quality and diversity of space is considered as much of a benefit as the quantum of space.</p> <ul style="list-style-type: none"> - The ambition to support for the creative industries is also supported, through the provision of a range of flexible workspaces that foster innovation. - The introduction of flexible E-class uses across the area, and across the Employment Zone more generally is supported to provide local facilities for workers and residents across Kensal including shops, restaurants, community facilities. - The creation of a new high street within the OA is supported, though its resilience in an already difficult retail market is likely to depend on improved connectivity. Careful emphasis needs to be placed on its location so that it is at least easily accessible to the surrounding area on foot or by bicycle to ensure it becomes part of the wider community. Consideration should be given to carrying out a thorough impact assessment, which assesses the impact this new high street might have on other local streets/secondary retail pitches (Ladbroke Grove & Golborne Road). - The Council should be flexible on how and where affordable housing is delivered, to ensure that the opportunity to deliver is maximised – working with landowners and looking holistically across Kensal. <p>Connectivity and Transportation</p> <ul style="list-style-type: none"> - The continued safeguarding of the site for a future/potential Elizabeth Line station is strongly supported. This would be a transformative benefit for the northern part of RBKC and local area more generally, which suffers from relatively poor connectivity to the London Underground network. - The delivery of infrastructure and transportation enhancements through the KCOA is essential for the benefit of the wider area, and to address 	<p>The SPD is unable to change policy.</p> <p>Noted.</p> <p>Noted</p> <p>Noted.</p> <p>The allocation sets out the scale of development by way of a neighbourhood centre.</p> <p>The Council will work comprehensively alongside developers to ensure the optimum number of affordable high quality homes are delivered across the site.</p>
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	<p>severance caused by the canal, railway lines and road network, which has created pockets with varying accessibility.</p> <ul style="list-style-type: none"> - Much of the north of the borough is identified as a key employment area (Kensal Employment Zone for example), and enhancements to the public transport network are essential to support the vitality and viability of the area as an employment zone, given the number of new commercial redevelopments that are coming forward in this part of RBKC, and in supporting accessibility for workers, many of whom will be coming from outside the immediate area. - Key junction works are also strongly supported, to Ladbrooke Grove in particular, to create a gateway that is attractive to all users and that prioritises public transport and sustainable transport including cyclists and walking. - Legibility and a strong hierarchy of streets is strongly supported, with positive and legible connections through to the surrounding area, particularly to the east and south of the OA. <p>Design, Place and Environment</p> <ul style="list-style-type: none"> - The introduction of density to the OA is supported, however this approach should also be considered across other parts of the Employment Zone, where like the OA there are limited heritage and conservation constraints. - Given the Government’s potential reforms to the planning system and categorisation of land for development (or not), optimising and maximising housing delivery especially in Kensal more widely will be essential given likely constraints on much of the borough going forward. - Investment in the public realm and local environment is strongly supported, as is investment in the canal side route as a space for pedestrians, leisure and commerce – as is seen in Camden for example where commercial uses front onto the canal, providing activity and interest, drawing people to the area. 	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted</p> <p>Noted</p> <p>Noted. The SPD is dealing specifically with the Opportunity Area and is unable to change established policy.</p>
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		<ul style="list-style-type: none"> - Many buildings currently ‘turn their back’ on the canal – which makes parts of the towpath unattractive for pedestrians. As such this should be carefully considered in the design of new buildings along the canal and around the wharves to deliver activity throughout the day, and a diversity of ground floor uses and spaces to dwell. - Events in the public realm would be strongly supported. - Development should be of the highest quality sustainable design and architecture. Architecture that reflects the local character and history of Kensal is strongly supported. - Greening, tree planting and soft landscaping is strongly supported – including the provision of public and private amenity space in a range of forms. - Construction management should be carefully considered to manage the impact on the existing residents and tenants in the surrounding area. <p>Engagement</p> <ul style="list-style-type: none"> - Wider engagement with existing landowners and occupiers in the wider Kensal area is encouraged and would be supported given the level of local knowledge and ability to input to the development of this vision, and to foster support going forward. 	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted</p> <p>Noted</p> <p>Noted.</p>
51	The Kensington Society	Kensal Canalside Opportunity Area first appeared in the 2011 London Plan (Annex 1), which shows an “Indicative employment capacity of 1,000 “and a “minimum” of 2,000 new homes”.	Noted. The SPD provides additional guidance to the adopted Development Plan (local Plan and London Plan) and in

	<p>A key challenge/constraint identified was the need for improved public transport accessibility, which “will be a major determinant of the final scale of the final scale of the development”, and that “this could include exploration of the potential for a Crossrail station.”</p> <p>The 2016 London Plan (Annex 1) increased the indicative employment capacity to 2,000 and the minimum number of new homes increased to 3,500. Again, the scope and scale of development was seen as “dependent on resolution of a number of challenges and constraints”, with “improved public transport will be a major determinant of the final scale of development.”</p> <p>The 2019 Local Plan Policy CA1: Kensal Canalside Opportunity Area proposes “a minimum of 3,500 new residential units, 10,000 sqm of new offices and 2,000 sqm of new non-residential floorspace, including social and community and local shopping facilities in addition to the supermarket.” It would also include “a station on the Elizabeth Line.” Among the constraints it itemises “the road junction onto Ladbroke Grove.” Para 5.7.5 of the supporting text of Policy CA1 says:</p> <p>“If a new station on the Elizabeth Line is not agreed, the capacity and masterplan for Kensal Canalside Opportunity Area will need to be reviewed. Any change to the housing capacity and infrastructure provision of the site would need to be brought forward through the early review of the Local Plan.”</p> <p>The 2021 London Plan (Table 2.1) repeats the 2,000 jobs employment figure and the minimum capacity of 3,500 homes, but contains no other information as to how poor public transport accessibility will be addressed.</p>	<p>particular the site allocation at Policy CA1.</p> <p>The Council understand that a change to the minimum allocation of 3500 homes and infrastructure as set out in the Local Plan would need to be confirmed through a review of the Local Plan. However, the SPD does not</p>
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		<p>It would appear that:</p> <ul style="list-style-type: none"> • the minimum number of homes has increased from 2,000 in 2011 to 3,500 since 2016; • the number of jobs has increased from 1,000 in 2011 to 2,000 from 2016 onwards – although this is hard to reconcile with 10,000sqm of offices which is the amount that (at 1 job: 10sqm) would accommodate 1,000 jobs. If 2,000 jobs were to be accommodated it would require 20,000 sqm; and • the net residential density, excluding the area covered by non-residential uses, would be very high. <p>NB: London Plan 2021 Table 2.1, unlike previous plans, refers to “indicative homes” not the “minimum” number, based on either “the 2017 SHLAA capacity, the most recent development plan or the OA threshold figure”.</p> <p>It would appear that there will not be a new Elizabeth Line station. Without a significant uplift in public transport accessibility, this number of trips generated by 3,500 households and 2,000 additional jobs would not only be unsustainable, but also contrary to the development plan –</p> <ul style="list-style-type: none"> • Local Plan Policy CF5 (c), which requires new large-scale office developments to be located within a town centre, other accessible locations (defined in para 19.3.42 as a Public Transport Accessibility Level (PTAL) score of 4 or greater or within an Employment Zone; and 	<p>propose a change to the minimum housing number allocated in the Local Plan.</p> <p>Noted the SPD provides additional guidance to the adopted Local Plan policies.</p> <p>Both 2000 new jobs and 10,000sqm of new office space is allocated to be delivered on the site. This is accompanied by the re-provision of a new superstore and 2,000sq of non-residential floor space.</p> <p>Noted although it is likely that density will vary across the site in line with any masterplan.</p>
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	<ul style="list-style-type: none"> Local Plan Policy CT1(a): which requires high trip-generating development to be located in areas of the borough where public transport accessibility has a PTAL score of 4 or above and where there is sufficient public transport capacity, or that will achieve PTAL 4 or above and will provide sufficient capacity as a result of committed improvements to public transport. <p>Local Plan Para 20.3.2: “Development that generates a high number of new trips must be located in areas that have good public transport accessibility and where public transport has the capacity to accommodate the new demand.”</p> <p>There are no proposals to significantly improve public transport accessibility from “poor” (from a PTAL score (PTAL 0 to 2) to “good” (PTAL 4 or better).</p> <p>The Kensington Society is concerned that, given that there is very limited opportunity for significantly changing public transport accessibility levels, the amount of development proposed – 3,500 homes and accommodating 2,000 additional jobs – would be contrary to London Plan (2021), especially:</p> <p>Policy D2: Infrastructure requirements for sustainable densities:</p> <p>A. The density of development proposals should:</p> <ol style="list-style-type: none"> 1) consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels 2) be proportionate to the site’s connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services). 	<p>A strategic transport assessment has been undertaken and it identifies a number of infrastructure requirements to meet specific increases in demand on the network as set out in the SPD. New text has been added to clarify that a local network traffic model created for the Council in conjunction with TFL has been created to assess any forthcoming applications.</p> <p>All forthcoming planning applications will be determined in line with Development Plan policies and any other material planning considerations.</p>
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		<p>And</p> <p>Policy D3: Optimising site capacity through the design-led approach: B Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 Infrastructure requirements for sustainable densities.</p> <p>NB: These policies postdate the Local Plan (2019) – written in 2017. The Kensington Society is concerned that:</p> <ul style="list-style-type: none"> • Without a significant improvement in public transport accessibility levels, the scale of development – at least 3,500 homes and accommodation for 2,000 additional jobs - would be in conflict with both the London Plan and the Local Plan. The assertion that the Opportunity Area would be “well-connected” is misguided or misleading. • The SPD continues to safeguard a site for a station on the Elizabeth Line, when there is no firm proposal – committed and programmed – for such a station. Such safeguarding would be inappropriate. • Even if a station were built, it is still a problem of trying to put a gallon into a pint pot, as the amount of land to be developed, after allowing for the new superstore and new roads, would result in a massive built density. 	<p>The SPD promotes an increase in public transport within the Opportunity Area.</p> <p>Noted.</p> <p>The SPD sets out the infrastructure requirements to deliver the vision and objectives for Kensal Canalside.</p>
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		<ul style="list-style-type: none"> • Road Access to these landlocked sites has been a major barrier to large-scale development for the last 20 or more years. Designation as an Opportunity Area does not change the fundamental geography of this site – remains landlocked with constraints at the only entry/exit point – the Ladbroke Grove junction. It is also hemmed in by the canal, rail lines and Kensal Cemetery with one outlet. • The implied net residential densities would be very high and would require a high level of scrutiny to meet the requirements of London Plan Policy D3 C for assessing high density schemes in areas with a PTAL of less than 4. • London Plan Policy D9: Tall Buildings proposes that the location of tall buildings should be handled through a plan-led approach by the Council. To bring forward proposals for tall buildings would be premature and would pre-empt any reassessment of whether this site might be appropriate for tall buildings. • Moreover, the 2010 SPD on Building Height shows that a significant part of the northern part of the site is classified as a “buffer zone” to the Kensal Cemetery Conservation Area, which is “sensitive to tall buildings”. We understand that Historic England are very concerned about the prospect of tall buildings on Kensal Cemetery. To propose tall buildings in this area, in advance of the new Local Plan, is both the wrong way to change policy and in any case is premature. The sieve map in the SPD on Buildings Heights shows a large swathe south of the canal that would be “highly sensitive to tall buildings”. Even if the sieve mapping were repeated today this would still be the case. The southern part of 	<p>The SPD provides sufficient guidance on the need to increase the connectivity of the site and associated infrastructure.</p> <p>The SPD includes the safeguarding of a potential Elizabeth Line Station in the future to allow for changes to demand and TFL/Network rail priorities.</p> <p>The station was originally planned to be accessed via a bridge with a link down to track level. Given the bridge is still proposed to come forward the development of the site without an Elizabeth Line station does not preclude one from coming forward in the future.</p> <p>The SPD promotes a largely car free development with associated parking</p>
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		<p>the Opportunity Area is also covered by the buffer zone associated with the Oxford Gardens Conservation Area.</p> <ul style="list-style-type: none"> With regard to Height and Massing (Section 6.2), the Height Strategy would appear to produce a “wall” of development rising from the canal to 20 storeys yet refers to Trellick Tower as a reference point – at 98m/31 storeys the tallest building in the Borough. The picture (Fig 3) of Blackfriars Circus illustrates exactly the height of buildings that should not be built. This section illustrates clearly that the quantity, density and height of development exceeds anything that currently exists in the Borough. The new London Plan (March 2021) requires the Borough to take a plan-led approach by identifying which sites might be appropriate for tall buildings and showing this in the Local Plan. Existing evidence, based on the sieve mapping exercise undertaken for the 2010 SPD, would constrain scale of development proposed, especially the height of buildings. If a different approach were to be undertaken, this would need to be taken through the Local Plan and be subject to examination. Any approach which would depart radically from the current map would need to be tested – it would still be premature. To bring forward such a major change through an SPD would be challengeable. <p>Overall Assessment</p> <p>The designation of Kensal Canalside as an Opportunity Area in the London Plan does not of itself make it a deliverable proposition. There is a very good reason that these landlocked sites have remained underdeveloped – geography. Poor public transport accessibility levels, ranging from a PTAL 1 (Very poor) through 2 (Poor) to 3 (moderate) at Ladbroke Grove, cannot be changed.</p> <p>Local Plan (2019) Policy CA1: Site Allocation for the Kensal Canalside Opportunity Area, paragraph 5.7.5 recognises that:</p>	<p>for the superstore being located below. New text has been added to clarify that a local network traffic model created for the Council in conjunction with TFL has been created to assess any forthcoming applications.</p> <p>It is expected that density will vary across the site. However, the SPD does promote a high density development that delivers an optimum number of high quality affordable homes when balanced against other site constraints. Any planning application will be determined in line with Development Plan policies and any other material planning consideration.</p> <p>The height map is indicative only and the accompanying text has been amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan, the most recently adopted Development Plan Document.</p>
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“If a new station on the Elizabeth Line is not agreed, the capacity and masterplan for Kensal Canalside Opportunity Area will need to be reviewed. Any change to the housing capacity and infrastructure provision of the site would need to be brought forward through the early review of the Local Plan.”

The analysis in this draft SPD – which is the “technical and feasibility assessment” referred to in para 5.7.4 of the Local Plan – seems to confirm the need for a rethink of the capacity of the Opportunity Area.
Draft Building Heights SPD (2008)



As above.

			Noted – see responses above
52	J. Wilson	<p>Very supportive of a residential-led use for the site redevelopment, given the housing shortage in London, and hope that viability allows for 35% affordable provision.</p> <p>A key benefit that could mitigate the impact of the development would be improving permeability south across the railway lines and north across the cemetery for both pedestrians and cyclists.</p> <p>I would be keen to hear updates about the project as a local resident that also works nearby.</p>	<p>Noted.</p> <p>Noted.</p>
53	Valerie Jamieson	<p>I am a supporter of London redevelopment and regeneration, especially when residential housing forms an integral part of any proposal. Houses rather than tower blocks I believe would be best, but as long as genuinely affordable homes are intended then this development is very promising. My personal concern, however, is the proposed bicycle route through the Kensal Green Cemetery. This would be terrible. During a funeral the one thing you don't want is people whizzing by on bicycles, making a disturbance at what is an emotionally difficult time. Then there are those bereaved who visit regularly to tend graves and spend time with those loved ones who have died. I would not feel safe being in a deserted</p>	<p>Noted.</p> <p>The height map is indicative only and the accompanying text has been amended to clarify that tall buildings will be assessed in line with Policy D9 of the London Plan.</p> <p>The SPD sets out the Council's approach to ensuring the optimum</p>

	<p>graveyard knowing that anyone could gain access and cycle through and rob me or worse. It is also a conservation area and the cycle path would disturb fauna, destroy flora and add the problem of litter. Sadly, not all cyclists are respecters of the law or rules and it would be impossible to police this new route. I believe it would be so disrespectful to permit any such route - almost as bad as Shirley Porter selling off the Westminster cemeteries for £1!"</p>	<p>delivery of high quality genuinely affordable homes. Noted. Any route through the cemetery would be subject to the opening hours of the cemetery and agreement of access from the Cemetery Company.</p> <p>The SPD notes that the route will need to ensure safe access and should respond to the special historic interest of the cemetery. Concerns over respect for the cemetery are noted. However, the terms of use of any such route would need to be agreed with the cemetery company.</p>
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