

CONSULTATION ON DRAFT KENSAL CANALSIDE SUPPLEMENTARY PLANNING DOCUMENT

COMMENTS BY THE KENSINGTON SOCIETY

Background:

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”. 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”.

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”.

The 2019 Local Plan Policy CA1: Kensal Canalside Opportunity Area proposes “a minimum of 3,500 new residential units, 10,000 m² of new offices and 2,000 m² 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:

“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 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.

It would appear that:

- 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 10,000 m² of offices which is the amount that (at 1 job: 10 m²) would accommodate 1,000 jobs. If 2,000 jobs were to be accommodated it would require 20,000 m²; and
- the net residential density, excluding the area covered by non-residential uses, would be very high.

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”.

There will be no new Elizabeth Line station for this site. 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.

- 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

- 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.

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”.

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).

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:

Policy D2: Infrastructure requirements for sustainable densities:

A. The density of development proposals should:

- 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).

And

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.

NB: These policies postdate the Local Plan (2019) – written in 2017.

The Kensington Society is concerned that:

- 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.
- **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 the Opportunity Area is also covered by the buffer zone associated with the Oxford Gardens Conservation Area.
- 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.

Overall Assessment

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.

Local Plan (2019) Policy CA1: Site Allocation for the Kensal Canalside Opportunity Area, paragraph 5.7.5 recognises that:

“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.



Picture in the 2010 SPD on Building Height which shows that a significant part of the northern part of the site is classified as a “buffer zone” to the Kensal Cemetery Conservation Area.