

Royal Borough of Kensington & Chelsea - Local Plan Partial Review

Examination in Public

Issue 2c - Vision for Kensal (CV5) and Kensal Canal side Opportunity Area (CA1)

Representations by National Grid and St William Homes LLP

St William Homes LLP is a joint venture between National Grid and the Berkeley Group, established to bring forward regeneration and the redevelopment of decommissioned National Grid sites and to deliver major residential and mixed-use development schemes across London and the south-east. The Berkeley Group brings substantial experience of redeveloping complex regeneration sites and has the ability to deliver a significant number of new homes.

In respect of the Royal Borough of Kensington and Chelsea (RBKC), St William has an interest in the National Grid owned site at the former Kensal Gasworks in Kensal Green within the Kensal Canal side Opportunity Area (KCOA).

On this basis, St William play a key role in the delivery of a comprehensive development proposal for the KCOA. The responses to the questions raised by the Inspector on this site from National Grid and St William are, therefore, set out below.

Question 2a - Have the policies been positively prepared and is the mix of uses proposed justified as the most appropriate strategy for this area?

To be positively prepared the plan should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements consistent with achieving sustainable development. It is considered that, with regard to KCOA the plan does seek to proactively drive and support sustainable economic development to deliver the homes, employment and infrastructure required for the Borough (paragraph 17, third bullet, NPPF).

Brownfield strategic sites such as Kensal Gasworks are complex to develop and require a number of issues to be addressed in order to ensure that they are optimised to their full potential to help meet the borough's well established housing needs, particularly in respect of the Housing White Paper (February 2017). We can confirm that St William will actively engage with all relevant parties in order to assist in bringing the site forward for comprehensive development and to optimise its potential to deliver needed homes and deliver much needed regeneration of this strategic vacant brownfield site.

The KCOA is a significant brownfield opportunity with good public transport connections (which could be enhanced). Given the scale of the site, it is right to encourage the effective and optimum use of the site through a mixed use development but with predominantly residential to meet the housing needs of the Borough. A good range of uses is proposed including residential, offices and retail. However, there is some reservation that the amount of office space is very prescriptive with little scope for flexibility. It is important to ensure that policies are flexible enough to adapt to change throughout the Local Plan period to ensure that they can be delivered. Overly prescriptive requirements could adversely impact on deliverability. As such, it is proposed that the wording "including other employment generating uses" should be added to make the policy Sound.

It is, however, important that to deliver these uses within a sustainable development, it is necessary to bring proposals forward comprehensively as stated Policy CA1 to achieve the aspirations of the Plan.

2 c Are they in general conformity with the London Plan and are they consistent with national policy in enabling the delivery of sustainable development?

Yes. The London Plan (Policy 3.4) requires that, having taken into account local context and character, the design principles and public transport capacity, development should optimise housing output for different types of location.

Policy 3.3 confirms that Boroughs should seek to achieve and exceed the relevant minimum borough annual average housing target in Table 3.1. It also adds that Boroughs should identify and seek to enable additional development capacity to be brought forward to supplement these targets having regard to the other policies of this Plan and in particular the potential to realise brownfield housing capacity through the spatial structure it provides including:

- intensification (see policies 2.13, 3.4)
- opportunity and intensification areas and growth corridors (see policies 2.13 and 2.3)
- mixed use redevelopment, especially of surplus commercial capacity and surplus public land.

Policy 4.1 states that The Mayor will work with partners to promote and enable the continued development of a strong, sustainable and increasingly diverse economy across all parts of London, ensuring the availability of sufficient and suitable workspaces in terms of type, size and cost, supporting infrastructure and suitable environments for larger employers and small and medium sized enterprises, including the voluntary and community sectors.

Policy 2.13 of the London Plan states that within the opportunity and intensification areas shown in Map 2.4, the Mayor will provide proactive encouragement, support and leadership for partnerships preparing and implementing opportunity area planning frameworks to realise these areas' growth potential.

Kensal Canalside is in an Opportunity Area in the London Plan to provide an indicative employment capacity of 2,000 new jobs and a minimum of 3,500 dwellings. It adds that the scope and scale of development as an Opportunity Area is dependent on resolution of a number of challenges and constraints. Improved public transport accessibility will be a major determinant of the final scale of development. The opportunity to build over the railway tracks and to address constraints imposed by existing gasholders should be investigated.

Overall, the development of this site is considered to be deliverable, as the main constraints can be overcome/addressed. St William and National Grid can confirm that they are committed to working collaboratively with Ballymore, Sainsburys and RBKC to achieve the aspirations and objectives of London Plan and the Local Plan.

In this regard, it is noted that there is a specific statement that "the constraints imposed by the existing gas holders should be investigated". Cognisant of the constraints associated with the existing gasholders and in the interests of adding certainty to the regeneration process for KCOA, National Grid can confirm that they are in the process of completing a unilateral undertaking which will obligate them to commence procurement of the revocation of the Hazardous Substances Consent within a fixed period of 2 years. This is not the preferred approach of National Grid, as they would normally wait until certainty on planning through a planning permission. However, in this case, it is considered that this approach would overcome that particular constraint and, by adding certainty to the HSC Revocation within a finite period of time, allow development to be brought forward.

St William and National Grid are of the view that, in order to meet the objectives of National, London and Local Plan policy and to optimise the delivery of new homes and new jobs, it will be imperative to deliver the KCOA collaboratively with adjoining landowners and the LPA in a comprehensive manner not piecemeal. There is also a need to incorporate sufficient flexibility within the Local Plan to allow innovative solutions that respond to changing market conditions, decisions about strategic infrastructure etc. and to achieve optimum delivery. As such, there is a need for the Local Plan to provide strong framework and objectives, but with a sufficient degree of flexibility to facilitate optimum solutions.

This can all be achieved, but only through comprehensive development. A piecemeal approach to bringing forward development would not be conducive to comprehensive development and would represent a missed opportunity to optimise the development potential of the whole site.

2d - Will they be deliverable over the plan period, including the quantum of residential development proposed to 2031/32 and the proposed new road and rail infrastructure?

With all of their knowledge and expertise in bringing forward complex, mixed use regeneration schemes, St William are of the view that development at this site is deliverable, provided that a comprehensive approach is taken to bringing forward the site by all parties and there is good support from the Council.

In respect of the development of new vehicular and pedestrian and cycle bridges over the railway, it is recognised that obtaining the strongest possible public transport links would be beneficial to the delivery of housing and regeneration on site. However, it should be noted that there are viability and deliverability issues to be considered that would need to be addressed at the planning application stage in order to facilitate this. Alternative approaches may need to be considered.

Therefore, whilst the potential new bridges over the railway are supported, it will need further work to understand the overall feasibility (particularly costs) and how this impacts on overall viability. The policy should also allow for alternative approaches to be considered.

2f. - Should the vision and site allocation policy be modified to allow for the development of the Kensal Canalside with or without a new railway station?

The inclusion of a new station on the Elizabeth Line within the site allocation is fully supported, in principle. However, whilst we understand that the Council is in active discussions with Network Rail about the station, there has been no formal decision on the Kensal Portobello station and whether it will be agreed. As such, for the delivery of the Plan, it will be important to ensure that the comprehensive development of the site is not held up by a change in plans or decisions made by others by allowing the scope for alternative solutions. This is also as applicable to other related infrastructure matters, such as the bridge over the railway, other public transport accessibility improvements.

For the Plan to deliver the homes and jobs needed, it must have policies that are able to facilitate any eventuality and also be cognisant of market conditions and overall viably as set out above. Paragraph 154 of the NPPF states that 'plans should be aspirational but realistic'. In this regard, paragraph 173 of the NPPF confirms that pursuing sustainable development requires careful attention to viability and costs in plan making. As such sites and the scale of development identified in the Plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.

Paragraph 182 of the NPPF requires that, to be sound, Plans must be deliverable over its period and should enable the delivery of sustainable development in accordance with the policies in the Framework.

Therefore, St William and National Grid would emphasise that the framework for development of this last remaining strategic brownfield site in the Borough, which could make a significant contribution to meeting the Borough's housing needs, should be robust and flexible to allow for any change outside of the Council's

control. As such, the Policy should be flexible enough to allow for considering alternative strategies to unlock the potential of the site and to ensure delivery.

Kensal Canalside is a brownfield, urban site with significant potential to deliver the homes that are needed. A new station would significantly enhance the potential of the site, but it is clear that development could still take place on the Kensal Canalside Site without a station and, therefore, plans should be in place to adapt to such a change by allowing for alternative strategies. The way that the Plan is prepared recognises this.