

Sainsbury's and surrounding former utilities land, Canal Way, London

Local Planning Authority: Kensington and Chelsea

Local Planning Authority reference: PP/23/06575

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Hybrid application for the demolition of all existing buildings and structures and creation of a mixed-use development of residential, retail, commercial, and community uses up to 339,458.9 sq.m GEA, in buildings ranging in height up to 29 storeys with associated public realm and infrastructure.

The applicant

The applicant is Ballymore and Sainsbury's and the architect is Faulkner Browns Architect.

Strategic issues summary

Land use principles: The redevelopment of a brownfield site within an opportunity area for a residential-led mixed use development, which would deliver up to 2,519 homes is strongly supported.

Housing and affordable housing: The proposal would provide 25% affordable housing by habitable room, 20% by unit. In addition, the 16 existing social rent homes will be replaced on site, with phasing, tenure and security of tenure being secured. This is a low level of affordable housing considering the scale and nature of the proposed development. GLA officers are scrutinising the Viability Assessment to ensure that the development delivers its maximum contribution to affordable housing.

Urban Design: The proposed heights would be contrary to the locational requirements of part B of policy D9 and further information is required to comply with the qualitative assessment set out in Policy D9. The Design Code is not considered to robustly secure high-quality development and must be addressed prior to the Mayor's decision-making stage.

Heritage: The development would result in medium to high level of less than substantial harm to the significance of designated heritage assets. The harm must be outweighed by public benefits of the proposals.

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

Further information on **Energy, Whole Life Carbon, Circular Economy, Air Quality** and **Biodiversity** is required prior to the Mayor's decision making stage.

Recommendation

That Kensington and Chelsea Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 171. Possible remedies set out in this report could address these deficiencies.

Context

1. On 08 November 2023 the Mayor of London received documents from Kensington and Chelsea Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following Categories of the Schedule to the Order 2008:
 - 1A "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats".
 - 1B " Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or building outside Central London and with a total floorspace of more than 15,000 square metres"
 - 1C "Development which comprises or includes the erection of a building more than 30 metres high and is outside the City of London"
 - 3F "Development for a use, other than residential use, which includes the provision of more than 200 car parking spaces in connection with that use".
3. Once Kensington and Chelsea Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct

refusal; take it over for his own determination; or, allow the Council to determine it itself.

4. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.
5. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planapps.london.gov.uk/>.

Site description

6. The application site is approximately 7.6 hectares and comprises a Sainsbury's store (8,823 sq.m. GIA), 395 car parking spaces, and a petrol filling station on the eastern half of the site. At the north-east corner of the site is a canal basin and adjacent Boathouse Centre providing canal-based youth activities, community meeting rooms, and housing, including 16 affordable homes. To the east of this, fronting onto Ladbrooke Grove is Canalside House, which provides workspace. The western part of the site behind the Sainsburys was previously used by Crossrail, but now comprises of several storage compounds, hardstanding and temporary offices.
7. The site effectively forms an island, bordered by the Grand Union Canal to the north (including residential boat moorings), with Kensal Green Cemetery beyond; Ladbrooke Grove to the east; the operational National Grid site to the west; and Great Western railway lines to the south, with the North Pole Rail Depot beyond. All vehicular access is currently from a single point to the east, off Ladbrooke Grove via Canal Way; with pedestrian and cycle connections from the north-east part of the Ballymore/Sainsbury's site to the canal towpath, which runs east and west along the northern boundary of the site.
8. The Kensal Canalside Opportunity Area also includes the North Pole Depot, which lies to the south of the railway lines and the 1.46 hectare Kensal Green Gasworks site which lies to the northwest, comprising decommissioned gasholders. These do not form part of the application site. The application site forms a majority of the Kensal Canalside Opportunity Area, which is reflected in Site Allocation CA1 within the Council's Local Plan.
9. Kensal Green Cemetery across the canal to the north is Grade I listed on the Register of Parks and Gardens of Historic Interest, contains several Grade I and II* listed buildings and c.130 Grade II listed structures. The Grade II* listed Kensal House and Kensal Day Nursery to the south-east of the site was built in the 1930s as an exemplar 'urban village' for the employees of the gasworks. Several conservation areas are in proximity of the site, including Oxford Gardens to south, and Queens Park Estate and Queens Park to north-east, which also contain listed buildings.
10. The north-west part of the site, the rail corridor, the North Pole Rail Depot and Kensal Green Cemetery are designated as Sites of Importance for Nature Conservation (SINC).

11. The site has a varied PTAL (Public Transport Access Level) ranging from 5 in the east of the site, to 3 at the west, on a scale of 0 to 6b, where 6b is highest.
12. Ladbroke Grove station is found 1km south of the site which is served by the Circle and Hammersmith and City lines. Kensal Rise station is found 1km north of the site which is served by London Overground services. Kensal Green station is also approximately 1km northwest from the site and is served by the Bakerloo line, and London Overground services. Noting that these stations are beyond what is considered a 'reasonable' walking distance, some trips would be made by bus to access rail services.
13. The nearest part of the Transport for London Road Network (TLRN) is the Westway (A40), which is 0.9km south of the site. Harrow Road (A404) is 0.2km north of the site and forms part of the Strategic Road Network (SRN). While the Council is the Highway Authority for this road, TfL has a duty under the Traffic Management Act 2004 to ensure that any development does not adversely impact on the operation of the SRN.

Details of this proposal

14. The hybrid application comprises the redevelopment of the site through demolition of all existing buildings and structures including supermarket, car park and petrol filling station, office building (Canalside House), community, sports and housing building (Boat Centre), and gas governor, and the creation of a mixed-use development of residential, retail, commercial, and community uses up to 339,458.9 sq.m GEA, in buildings ranging in height from 2 storeys, up to 29 storeys (98 metres), with associated public realm and infrastructure.
15. The detailed element comprises a supermarket and ancillary facilities (23,248.9 sq.m GEA), ground floor commercial, business and service units (Use Class E) (732.7 sqm GEA), leisure floorspace (369.3 sq.m GEA), residential facilities (8,244.5 sq.m GEA), new site access at Ladbroke Grove, provision of new pedestrian and vehicular access, internal roads and associated landscaping, car and cycle parking and associated infrastructure works.
16. The outline element includes proposals for up to 2,519 homes and 290,913.5 sq.m GEA residential floorspace and up to 15,950 sq.m GEA non-residential floorspace comprising flexible commercial, community and sui generis floorspace, the provision of new pedestrian and vehicular access, open space, landscaping, car and cycle parking and other associated infrastructure works.
17. The proposals also include the safeguarding of land adjacent to the railway tracks in the middle of the site and a contribution towards a bridge over the railway tracks to connect the application site to the North Pole Depot site and the areas beyond.

Case history

18. Pre-application meetings to discuss the proposals have been held with the applicant, GLA and the Council. Several meetings have been held across 2021,

2022 and 2023 before a break in meetings, which re-began in 2022 and continued through 2023.

Strategic planning issues and relevant policies and guidance

19. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Kensington and Chelsea Local Plan (2019); and, the London Plan 2021.

20. The following are also relevant material considerations:

- The National Planning Policy Framework and National Planning Practice Guidance;
- Kensington and Chelsea Local Plan review
- Kensal Canalside Supplementary Planning Document (July 2021)

21. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:

- Opportunity Area - London Plan;
- Regeneration Area - London Plan; the Mayor's Economic Development Strategy;
- Housing - London Plan; Housing SPG; the Mayor's Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG; Housing Design Standards LPG;
- Affordable housing - London Plan; Housing SPG; Affordable Housing and Viability SPG; the Mayor's Housing Strategy;
- Retail / Office - London Plan;
- Utilities infrastructure - London Plan;
- Urban design - London Plan; Character and Context SPG; Public London Charter LPG; Characterisation and Growth Strategy LPG; Optimising Site Capacity: A Design-Led Approach LPG; Housing SPG; Play and Informal Recreation SPG; Housing Design Standards LPG
- Fire Safety – London Plan; Fire Safety draft LPG;
- Heritage - London Plan; World Heritage Sites SPG;
- Inclusive access - London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG

- Sustainable development - London Plan; Circular Economy Statements LPG; Whole-life Carbon Assessments LPG; 'Be Seen' Energy Monitoring Guidance LPG; Energy Planning Guidance; Mayor's Environment Strategy;
- Air quality - London Plan; the Mayor's Environment Strategy; Control of dust and emissions during construction and demolition SPG; Air quality positive LPG; Air quality neutral LPG;
- Ambient noise - London Plan; the Mayor's Environment Strategy;
- Transport and parking - London Plan; the Mayor's Transport Strategy;
- Crossrail - London Plan; Mayoral Community Infrastructure Levy; Crossrail Funding SPG; Use of planning obligations in the funding of Crossrail and the Mayoral Community infrastructure levy SPG;
- Equality - London Plan; the Mayor's Strategy for Equality, Diversity and Inclusion; Planning for Equality and Diversity in London SPG;
- Culture - London Plan; Mayor's Cultural Strategy;
- Leisure- London Plan;
- Waterways - London Plan;
- Green Infrastructure - London Plan; the Mayor's Environment Strategy; Preparing Borough Tree and Woodland Strategies SPG; All London Green Grid SPG; Urban Greening Factor LPG
- On 24 May 2021 a Written Ministerial Statement (WMS) was published in relation to First Homes. To the extent that it is relevant to this particular application, the WMS has been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation. Further information on the WMS and guidance in relation to how the GLA expect local planning authorities to take the WMS into account in decision making can be found [here](#). (Link to practice note)

Land use principles

22. London Plan Good Growth objectives seek to build strong and inclusive communities, with Objective GG2 promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. Objective GG4 seeks the delivery of good quality homes that meet high standards of design and that support the delivery of the strategic target of 50% of all new homes being genuinely affordable.
23. The application site forms the majority of the Kensal Canalside Opportunity Area (OA) set out within policy SD1 of the London Plan, which indicates a capacity of 3,500 new homes and the creation of 2,000 new jobs. The OA is reflected in the

existing and draft Local Plan site allocation and the Council's Kensal Canalside SPD which provides guidance on the re-development of the OA.

24. The Local Plan Site Allocation CA1 for the whole opportunity area identifies a requirement for a minimum of 3,500 new homes, 10,000 sq.m. of new offices and 2,000 sq.m. of new non-residential floorspace, including social and community and local shopping facilities, in addition to the re-provided supermarket. The draft Local Plan identifies a minimum of 12,000 sq.m. of commercial floor space in addition to the relocated supermarket, of which 5,000 sq.m. should be Use Class E(g) as part of a new Neighbourhood Centre. Affordable workspace is also required, of either 500 sq.m. or 10% of the Use Class E(g) space, whichever is greater, within the Neighbourhood Centre
25. The proposal is the first site of the wider Opportunity Area and Site Allocation to come forward for development. It will transform the existing supermarket and car park to deliver residential-led mixed use development as part of a masterplan which seeks to optimise the site's capacity across multiple land ownerships. The redevelopment of this brownfield site within an OA through masterplan approach is strongly supported.
26. The development proposes the following land uses across the detailed and the parameters of the outline elements:

Detailed land uses

LAND USE	PROPOSED FLOOR AREA (GIA)	PROPOSED FLOOR AREA (GEA)
Residential – Class C3	7,756sqm	8,244.5sqm
Food retail (Sainsburys) – Class E(a)	22,955sqm	23,248.9sqm
Commercial – Class E	647.9sqm	732.7sqm
Leisure – Class E(d) / Class F2(d)	340.3sqm	369.3sqm
TOTAL	31,699.2sqm	32,595.4sqm

Outline parameters (commercial and community)

LAND USE	PROPOSED MINIMUM FLOOR AREA (GEA)	PROPOSED MAXIMUM FLOOR AREA (GEA)
COMMERCIAL SPACES – RETAIL		
Retail – Class E(a)	1,100	2,750
Food and Beverage (Restaurant / Café / Drinking Establishment) – Class E(b) / Sui Generis	1,650	3,850
Cycle hub – Class E	0	275
COMMERCIAL SPACES – LEISURE		
Leisure – Class E(d) / Class F2(d)	550	2,200
COMMERCIAL SPACES – WORKSPACE		
Flexible workspace – Class E(g) (including re-provided Canalside House floorspace)	4,400	6,380
COMMUNITY SPACES		
Community – Class F2	550	1,650
Community leisure – Class E(d) / F2 (including indoor sports facility and re-provided Boat House facilities)	1,100	2,200
Creche – Class E(f)	0	385
Health – Class E(e)	0	330
MAXIMUM CAP FOR NON-RESIDENTIAL FLOORSPACE		15,950sqm (GEA) 14,500sqm (GIA)

27. The development would provide up to 2,519 homes and up to 299,158 sq.m GEA residential floorspace. Whilst residential floorspace is included within the detailed element, this is ancillary floorspace including cycle parking, plant and basement circulation space, and all homes are included within the outline element.

28. The phasing plan assumes a build out duration of 11 years with the initial phase comprising enabling works, decontamination and localised demolition and the delivery of the new Sainsburys store, reclaimed basin, the homes in plots 2 and 4, new roads and pavement, temporary bus stands and vehicle logistics and the new park in plot 6. Phase 2 will include the construction of the blocks in plots 1, 5 and 6 and the landscaping. The phasing and the delivery of affordable homes, supporting transport infrastructure, open space and the re-provided homes must be appropriately secured. The phasing plan and delivery of development doesn't include and account for the delivery of the bridge connection over the railway lines which is vital to provide access to services and facilities in the area beyond.

Housing

29. London Plan Policy H1 seeks to increase the supply of housing and sets a 10-year housing target in Table 4.1 for RBKC of 4,480. Furthermore, as previously mentioned the application site forms the majority of the Kensal Canalside Opportunity Area which has an indicative capacity of 3,500 new homes, table 2.1 Policy SD1. The masterplan would provide up to 2,519 residential units and 271,963 sq.m (GIA) floorspace. The redevelopment of this brownfield site for a significant quantum of housing would support the growth and regeneration of the OA and would substantially deliver on the targets within H1 and SD1 and is strongly supported.

30. London Plan Policy H8 states that the loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent

floorspace. It goes on to state that before considering the demolition and replacement of affordable homes, alternative options should be considered which should balance the potential benefits against wider social and environmental impacts, and that social rent housing should be replaced like for like. The existing Boathouse Centre on the North-eastern part of the site (plot 6) comprises 16 social rent homes operated by Peabody, which would be demolished as part of the site wide redevelopment. The applicant has stated that this facilitates the site to be developed holistically and for a new open space to be created within plot 6 at the entrance of the site. The existing building is stated as being in a dilapidated condition, of low architectural interest and lacks permeability through to the canal towpath. The applicant has confirmed that the existing affordable homes will be re-provided within the masterplan and that the existing homes will not be demolished until all residents are provided with a new home on the site. An accommodation schedule of the existing homes must be provided. The re-provision of equivalent affordable floorspace must be secured, along with ensuring that the residents benefit from the same tenure and security of tenure. It should be noted, if GLA grant funding is to be sought, all of the funding criteria must be met.

Commercial

31. The existing Sainsburys store extends to 8,823 sq.m GIA with additional external servicing yard and 398 car parking spaces. The proposed store would be larger than the existing at 13,341 sq.m GIA with a servicing yard and 227 car parking spaces located within a basement beneath the store. The petrol station would not be re-provided. The re-provision of the Sainsburys supermarket aligns with the existing and draft site allocation and the Kensal SPD.
32. The majority of the proposed commercial uses are located within the outline element of the scheme, and the exact quantum of development will be controlled by minimum and maximum parameters which are set out in the table above. Whilst the overarching quantum of commercial floorspace broadly aligns with the site allocation, the existing Local Plan requires 10,000 sq.m of office floorspace. Whilst the quantum of office floorspace proposed is up to 5,000 sq.m, which would fall short of this requirement, the proposals would align with the office use required by the draft Local Plan. The LPA should satisfy themselves of the quantum and mix of commercial floorspace set out in the development parameters. The scale of commercial uses proposed would support the provision of employment and the creation of jobs, contributing towards employment capacity of the OA, and is strongly supported.
33. The application must secure the delivery of affordable workspace as required by the site allocation and set out in policy E3 of the London Plan. This must be appropriately secured within a legal agreement.
34. The development proposes the demolition of the existing Canalside House, on the corner of the junction with Ladbrooke Grove which comprises approximately 880 sq.m floorspace. The development parameters of commercial floorspace within the outline element re-provides the demolished floorspace and this must be appropriately secured.

London Culture

35. London Plan Policy HC5 states that development proposals should protect existing cultural venues, facilities and uses and ensure Opportunity Areas and larger scale mixed-use development include new cultural venues and/ or facilities and spaces for outdoor cultural events.
36. The existing site is used by the Notting Hill Carnival each year for music stages, adjacent to Canalside house and as an assembly point. The applicants have engaged with the carnival organisers and state that the intention is for the proposed public open space within plot 6, known as Ladbroke Gardens, to be used as an events space and soundstage during carnival, and this is referred to in the Design Code which is welcomed. It is also stated that the network of streets within the masterplan could provide areas for carnival to set up in a similar manner to the existing condition. The engagement to date and continued engagement is supported. However, whilst the proposals discuss the condition in the proposed situation, it's not clear how the phased construction of the masterplan over 11 years would impact on the carnival and how its uses can be continued through the duration of the construction works. This must be set out further prior to stage 2.

Social Infrastructure

37. As part of the redevelopment of plot 6, it is proposed to demolish the Boathouse Centre which provides 940 sq.m of social infrastructure, run by the London Sports Trust. Policy S1 of the London Plan states that development proposals that result in a loss of social infrastructure in an area of defined need identified in the Borough's social infrastructure needs assessment, should only be permitted where there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood and wider community, or the loss is part of a wider public service transformation plan.
38. The outline element would provide a minimum of 1,110 sq.m GEA community leisure use, with a maximum of 2,200 sq.m GEA, with the indicative scheme proposing community uses in Plot 2.9 and 6.2. The principle of re-provision on site is supported and must be appropriately secured. The applicant has stated that the re-provided leisure uses would be provided prior to the demolition of the existing centre. This must be appropriately secured.

Housing

39. London Plan Policy H4 seeks to maximise affordable housing delivery, with the Mayor setting a strategic target for 50% of all new homes to be genuinely affordable. London Plan Policy H5 states that the threshold level of affordable housing is a minimum of 35%, or 50% for former industrial land and public sector land. Regarding surplus utilities sites supporting paragraph 4.5.7 and footnote 59 recognises that if robustly demonstrated that extraordinary decontamination, enabling or remediation costs must be incurred to bring surplus utilities site forward for development, then a 35% affordable housing threshold could be applied. The application site encompasses some land owned by the Council, and

as per Policy H5, a 50% threshold applies to the public land. Policy H8 of the London Plan states that any proposals that include the demolition and replacement of affordable housing is required to follow the Viability Tested Route. Supporting paragraph 4.8.5 recognises that estate regeneration schemes that involve the loss and replacement of affordable housing should deliver an uplift in affordable housing. However, given the primary driver of the development is the redevelopment of the brownfield land and Sainsburys supermarket, and the small scale of existing affordable housing on public land that has been included to facilitate a masterplan approach to the OA, the scheme could potentially follow the Fast Track Route. Therefore, subject to the satisfactory demonstration of abnormal decontamination costs, the overall blended fast track viability threshold would be approximately 35.7%.

40. Affordable housing should meet the Mayor's preferred tenure mix, outlined in Policy H6 of the London Plan of at least 30% low cost rent (London Affordable Rent or Social Rent), at least 30% intermediate (London Living Rent or London Shared Ownership) and the remaining 40% as determined by the Council.
41. The development proposes 25% affordable housing by habitable room, 20% by unit. This equates to 500 homes in the indicative scheme. The current low level of affordable housing provision falls significantly short of expectations for this large, long-term development that seeks such a significant uplift in development value, and falls well short of the fast-track threshold. GLA officers are scrutinising the case for significant abnormal decontamination costs and the Financial Viability Assessment to ensure that the development delivers the maximum amount. Further discussion is required regarding the viability assessment and issues raised must be resolved prior to stage 2.
42. If the development continues to fall short of the threshold requirements, several mid-stage reviews and a late-stage viability review, must be appropriately secured. These must be discussed in detail with GLA officers prior to any Stage 2 referral. An early stage (delayed implementation) review is also required in all circumstances.
43. As set out in the previous section of this report, the development proposes the demolition of 16 existing social rent homes within the Boat Centre. The 25% affordable housing provision excludes the 16 social rent homes which the applicant has stated will be re-provided on site. The re-provision of the equivalent amount of affordable housing floorspace, on the same tenure and security of tenure must be appropriately secured. The applicant has confirmed that the phasing of the development will provide the replacement homes prior to demolition, and this must also be secured.
44. The affordable housing tenure mix comprises 70% London Affordable Rent and 30% Shared Ownership, which is supported. Affordability levels and eligibility must be robustly secured in any S106 agreement.

Housing mix

45. Policy H10 of the London Plan encourages a full range of housing choice. It states that for low-cost rent, boroughs should provide guidance on the size of units required to ensure affordable housing meets identified needs.
46. The table below sets out the proposed residential mix across the outline element, broken down by tenure. It is welcomed that the affordable rented tenure is weighted towards family sized accommodation, for which there is most strategic need. Whilst the mix does not therefore raise strategic issues, the LPA should review the proposed housing mix and satisfy themselves that it appropriately meets the locally identified need.

TABLE 3 – OUTLINE ELEMENT RESIDENTIAL MIX

UNIT SIZE	% OF UNITS (PRIVATE TENURE)	% OF UNITS (INTERMEDIATE TENURE)	% OF UNITS (AFFORDABLE RENTED TENURE)
Studio	10-15%	0%	0%
1 bed	25-35%	40-60%	15-20%
2 bed	30-40%	40-60%	25-35%
3 bed	12-22%	0-5%	30-45%
4 bed	0-5%	0%	8-15%

Childrens playspace

47. Policy S4 of the London Plan states that development proposals should incorporate high quality, accessible play provision for all ages, of at least 10 sqm per child based on the GLA Population Yield Calculator.
48. The proposed illustrative scheme would generate a requirement based on the population yield calculator of 8,321 sq.m and would provide 9,203 sq.m of play space across the masterplan. The proposal includes play space within each plot across the masterplan. The playspace for 0-4 year olds is accommodated within each plot, however, for the other age categories, plots 1, 2 and 5 fall short of the required provision and the shortfall is accounted for within plots 4 and 6. Whilst the overall space requirement is met, it must be demonstrated how the different areas provide age appropriate facilities and equipment. The areas identified for playspace appear to have competing uses that would need to be resolved, e.g. plot 1 indicates the 'south terrace' will provide playspace for 0-12 year olds, shared cycle infrastructure and emergency vehicle route.
49. Given that the scheme is in outline and the final residential mix is not known, the playspace requirement in line with the London plan must be secured for each reserved matters application and it must demonstrate how this contributes to the playspace delivery across the masterplan. It must be demonstrated how playspace is maximised within each plot and how the playspace of each plot fits in with the masterplan wide playspace requirement and that any shortfall will be accommodated in future plots.

Urban design

50. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.
51. Policy D2 states that where there is currently insufficient capacity of existing infrastructure to support proposed densities, boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean that if the development is contingent on the provision of new infrastructure, including public transport services, it will be appropriate that the development is phased accordingly.
52. Policy D3 requires a design-led approach to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity; with higher density developments in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.
53. Policy D4 sets out that development proposals referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made or demonstrate that they have undergone a local borough process of design scrutiny. The pre-application proposals have been presented at several Design Review Panels.
54. Officers acknowledge that this site is in an opportunity area, is allocated for several thousand homes and as such development which delivers these objectives will be transformative. As outlined in this report, officers are supportive in principle of a significant amount of development coming forward on this site. Nevertheless, it is expected that a scheme that optimises development on the site should be designed to ensure as a minimum: good residential quality, attractive and high-quality buildings, and safe and uncongested routes. These matters in particular require significant further work before it can be agreed that the development responds appropriately to London Plan design policies.

Tall buildings, scale and massing

55. London Plan Policy D9 sets out requirements for defining tall buildings and locational requirements as part of a plan-led approach to the development of tall buildings. The policy goes on to identify visual, functional, environmental and cumulative impacts associated with tall buildings which should be addressed.
56. RBKC Local Plan Policy CL12 states that the Council will require new buildings to respect the setting of the borough's valued townscapes and landscapes through appropriate building heights reflecting the prevailing building heights within the context; seldom use height to express local landmarks; resist buildings significantly taller than the surrounding townscape other than in exceptionally rare circumstances where the development has a wholly positive impact on the

character and quality of the townscape; and require full planning applications for any building that exceeds the prevailing building height within the context. The existing Site Allocation does not identify appropriate building heights. Draft Local Plan Policy CD7 defines tall buildings for the Kensal Canalside OA as buildings of 30m or more in height. The draft policy goes on to identify suitable locations for tall buildings within Figure 4.4, and identifies building heights of 20-98m (6-31 storeys) as suitable buildings within Kensal Canalside. The emerging Site Allocation states “where tall buildings are deemed appropriate, they must not exceed 98 metres from the ground level to the top of the building or approximately 31 storeys”. The Kensal SPD sets out a general height strategy of 4-20 storeys with isolated points of heights identified in four locations across the OA. Three of these locations are within the application site and are at the entrance to the site adjacent to Ladbroke Grove, and close to both of the potential bridge landing points.

57. The development proposes a range of buildings on the site between 2 and 29 storeys. In total, the development comprises 20 tall buildings, with two referred to as ‘marker’ buildings. The submitted parameter plans includes a maximum height of building 2.1 as 98m and building 4.1 as 105.6m. As such, whilst the site is identified as being suitable for tall buildings, the development exceeds the maximum height quoted in site allocation within the draft Local Plan and the guidance within the Kensal SPD, and would therefore not fully comply with the requirements of Policy D9 part B.
58. The proposals locate the two ‘marker’ buildings, plots 2.1 and 4.1, above the Sainsburys store near the future connection over the railway, and to the northeast of the Sainsburys store where the site widens, broadly aligning with the locations in the Kensal SPD. The application refers to these buildings as ‘marker’ buildings, although this is somewhat undermined by the heights of other buildings on the site which extend up to 86.7m. The location of the ‘marker’ building 4.1, is in very close proximity to the tallest building on the emerging proposals of the St William site and of building 2.4 (86.7m) along with the second ‘marker’ building which is also in plot 2, which would create a cluster of the tallest buildings across the wider OA that would coalesce in views. As outlined further below, given the proposed heights, massing and locations, the Design Code is not sufficiently detailed to ensure the delivery of high-quality design and architecture that reinforces the spatial hierarchy, legibility and coherence of the group of buildings and skyline within the site, and this will need to be addressed prior to Stage 2.
59. The buildings that front onto the canal are generally lower in their height ranging between 9-14 storeys, along with a 2 storey building located on plot 5. The development parameters allow for variation in the heights which add interest to the massing that fronts the canal, with stepped down shoulder elements, particularly of building 5.1 and 6.1. This variation must be appropriately secured. The taller buildings, with the exception of plot 4.1, are located towards the southern part of the site closer to the railway line with the aim of minimising the impact of the massing on the Kensal cemetery. Other than the ‘marker’ building, these buildings range in height from 14 – 26 storeys. The proposals locate buildings of a lower scale adjacent to Kensal House, in order to ameliorate the height difference between the proposed development and the adjacent

townscape. The overall approach to the massing strategy of locating height to the southern side of the site adjacent to the railway and lower buildings to the north, to respect the relationship with Kensal Cemetery, is supported.

Visual impacts

60. A Townscape and Visual Impact Assessment (TVIA) accompanies the application with the illustrative scheme having been tested in 55 agreed views surrounding the application site.
61. The development would have a significant effect on Kensal Green Cemetery / St Mary's Cemetery conservation areas located just to the north of the canal boundary. It would also have a significant impact on the low-rise neighbourhoods east of Ladbrooke Grove, and the Delgarno neighbourhood south of the railway lines. In regard to the impact on heritage assets, the development would result in a medium to high level of less than substantial harm. This is further expanded upon in the heritage section below. **The proposals require clear and convincing justification and it must be demonstrated that there are clear public benefits that outweigh the harm.**
62. As previously mentioned, the height strategy locates the lower massing adjacent to the site edges where it meets the existing built form of Kensal House, and also along the Canal to respond to the proximity of the cemetery. This is evident in several of the immediate views from the townscape surrounding the site such as views from Ladbrooke Grove. In some instances, within the Design Code, the importance of the human scale within the site is acknowledged through the articulation of the base of the buildings, particularly identified within plot 1 and 6. This should be robust across all of the buildings within the masterplan. In middle distant views surrounding the site, the articulation and materiality of the middle portion of the buildings are key, particularly where the developments massing is highly visible e.g. view 8 and where the massing coalesces. Whilst the specified materials are mandatory for the marker buildings and of the mansion blocks in plot 4, and some elements of articulation are recommended in the Design Codes, this is not the case for all of the buildings across the masterplan.
63. The overall quality of the scheme and whether it has acceptable impact on the townscape relies on the delivery of high-quality design and architecture. Whilst the illustrative scheme appears to be of high-quality, this is not robustly secured through the mandatory rules of the Design Code. The delivery of high-quality design and architecture must be properly secured through the Design Codes and this must be secured prior to the Mayors decision making stage. Comments on the Design Code are also addressed separately below.

Functional impacts

64. Overall, officers have concerns regarding the functional impacts of the proposals, given the quantum of development proposed and the capacity of the area, the proposed site-wide routes and movement network and the wider transport network in the surrounding area. **This is particularly a consequence of the single point of access into the island site which is a significant constraint and also results from the lack of delivery of other transport connections to the site.** The

proposed quantum and density of the proposals requires appropriate supporting infrastructure, with concerns in particular over the access into the masterplan site and to facilities, services, walking and cycling networks in the wider area. This is addressed further in the transport section below.

Environmental impacts

65. In terms of environmental impacts, the proposed developments height and density will have daylight, sunlight, overshadowing and microclimate impacts. The impacts on existing and proposed homes, as well as amenity spaces and public open spaces must be fully assessed. The assessments that accompany the application demonstrate that there would be daylight and sunlight impacts on residential properties, significant overshadowing of the public realm, courtyards and podiums and that the density of development would lead to impacts from wind. The applicant's technical information will be assessed in detail by the LPA, and the applicant is encouraged to work with the LPA to provide and secure appropriate mitigation measures. Further testing and modelling must be carried out during reserved matters applications when the detailed design has been finalised and this must be secured.

Cumulative impacts

66. There are concerns with the cumulative visual, functional and environmental impacts of the proposed development. Given the height, massing and location of the tall buildings, the success and coherence of the group of buildings relies on the delivery of high-quality design and architecture, which must be secured through the design code. The cumulative impact of the tall buildings and quantum of development impacts upon the operation of the single point of vehicular access into the site and requires the delivery of adequate walking, cycling and public transport infrastructure to facilitate the quantum of development and to access services within the site and in the wider area. The application identifies potential cumulative environmental impacts relating to daylight, sunlight, overshadowing and wind, and appropriate mitigation must be secured.
67. Overall, the proposed development does not comply with the locational requirements of part B of policy D9 and as set out above, further information and detail is required to satisfy the requirements of part C prior to the Mayor's decision-making stage.

Design Code and Parameter Plans

68. The application is accompanied by parameter plans and design codes that set the rules and secure design for future detailed reserved matters applications. Overall, considering that the majority of the scheme, which includes very tall buildings, is submitted in outline, officers have concerns that the design code is deficient in its scope and detail and is therefore not robust enough to deliver a scheme of the design quality required by London Plan policies.
69. The parameter plans that accompany the application are sufficient in scope, however, further queries are set out below in relation to their content:

- As previously mentioned, there appears to be some inconsistency with the heights of the building 4.1 relating to the maximum extent of development, and commentary in the application documents.
- The parameter plans and design codes are not detailed enough to ensure high quality articulated massing of buildings e.g. building 6.1
- There are concerns with the proposed access and transport connections to the masterplan, which is further expanded upon the in the design and transport section below.

70. The Design Code is not robust in the rules that it sets future development across the site, and this could lead to development being delivered in detailed reserved matters applications that falls below the high quality required by the London Plan. The following high level comments are provided on the design codes:

- The Design Code insufficiently secures the delivery of market and affordable homes, in relation to equitable quality, tenure blind principles etc
- The quality of the residential uses to be delivered, are not adequately secured e.g. residential space standards, accessibility, amenity. The Design Codes must explicitly refer to internal space and quality standards, to ensure that development delivered through the Reserved Matters Applications achieves high quality design as required by policies such as D6.
- The Design Code does not robustly secure the character and design of buildings within individual plots, or how the plots knit together across the wider masterplan. The character and hierarchy of civic spaces and how buildings relate to the character of the spaces are not well defined in the design code.
- The inclusive accessibility of buildings and public spaces must be appropriately secured in the design code.
- The Design Code must include guidance on boundary treatments, in particular in regard to the site boundaries to the south, alongside the railway lines, and the east along Kensal House.
- Site wide strategies such as maximising green roofs, PV panels, playspace should be secured.

Development layout and public realm

71. London Plan Policy D8 requires new development to make use of opportunities that deliver new public realm, and ensure its design is fit for purpose, ties in with the public realm network in the wider area, and responds to the needs of local communities.

72. The application site is constrained by the railway line to the south and the canal to the north, which severs it from the surrounding areas beyond. The sole point of

vehicular access to the site is from the east. A primary road running east to west to the Sainsburys will comprise the High Street and will have to accommodate all vehicles for general access, buses and service/deliveries for the development (and to the St William site further west), along with proposed pedestrian and cycle access. Whilst this will reduce the amount of road space through the site, it raises concerns about the impact of large vehicle movements and pedestrian and cycle infrastructure. This is also contrary to the principles set out in the SPD, which sought to separate servicing and access movements from the east-west high street. It has not been demonstrated that the proposed walking and cycling infrastructure along this route satisfies the placemaking and urban design aspects of London Plan Policy D8. Concerns with the proposed infrastructure are also raised in the transport section below.

73. There are also concerns with the experience of pedestrians using South Drive. The route will be dominated by the vehicle access for Sainsburys customers and servicing vehicles, and the road will be characterised by the boundary with the Network Rail site and the railway lines. However, the route will be the main point of access to buildings 2.2, 2.3 and 2.4, which is proposed to comprise the affordable housing and the sports pavilion which is located at the far end of the site. Further consideration should be given to the experience of pedestrians along this route.
74. The concerns regarding South Drive are exacerbated by the blank frontages created by the Sainsburys supermarket which dominates the south elevation of plot 2. There are also considerable blank frontages to the other elevations within the detailed element of the application, including the primary frontage to the Sainsburys store. Activation of these frontages must be maximised.
75. Ground floor activation of buildings within the outline element must also be maximised, particularly of public amenity buildings such as the sports pavilion. The indicative proposals show substations (that serve the whole site) located along an entire frontage of the sports pavilion. The active frontages strategy in the Design Code requires further explanation as to what it secures, how it maximises active frontages and how it responds to the character of the proposed street network and spaces.
76. Where ground floor residential uses are proposed, in particular in Plot 04, direct access from the street should be provided to increase street activation and the potential for dual aspect or maisonette dwellings.
77. Pedestrian and cycle connections into the surrounding area will be vital to support the development and provide benefits to existing communities. As acknowledged in the application, the bridge across the railway lines will play an important part of this through significantly improving access to the supermarket and new amenities for existing residents in the vicinity, as well as access to off-site services, schools and play and sports facilities for residents of the proposed development. The applicant and the Council are encouraged to work together to deliver this vital infrastructure and ensure its early delivery to unlock benefits to communities in the wider area and on-site.

78. The park fronting the canal and Ladbroke Grove would be a positive addition to the neighbourhood and this forms part of the 3.68ha of publicly accessible open space that the development will deliver, including 0.9ha of playspace. The proposals would also deliver important public accessible amenities such as the redeveloped basin and a colonnade through building on Plot 06. Public access must be appropriately secured in line with the Public London Charter LPG and London Plan Policy D8.
79. Planting of scale along Ladbroke Grove and within the site boundary will be important to ensure the quality, attractiveness and function of the proposed public spaces. Mature planting should be secured from the earliest stages of the development, including the current detailed application, and should be secured by the Council by condition.

Internal quality

80. Whilst the layout of the residential buildings is reserved, there are significant concerns with the quality of the residential accommodation proposed in the illustrative scheme. As previously stated, the Design Code is not currently robust in securing high quality residential floorspace that will be delivered through reserved matters. This must be addressed prior to the Mayors decision making stage. Further detailed comments are provided below.
81. The illustrative masterplan on which the Design Code is modelled features a significant amount of single aspect dwellings, many of them coming off long double-loaded corridors. In several plots, approximately 50%-60% of homes will be single aspect. The Design Code should seek to maximise the provision of dual aspect dwellings by setting out a realistic and tested target for each plot. In addition, the Design Code seeks to confirm that 10 homes will be accessed via a single core, which is contrary to the standards set out in the London Plan Guidance. These design elements raise concerns that the standard of residential accommodation would not be sufficiently high quality and that the development therefore produces symptoms of overdevelopment.
82. Where single-aspect dwellings are considered appropriate, the applicant must demonstrate the dwellings achieve adequate levels of daylight/sunlight, cooling and ventilation.
83. The distance between blocks within Plot 02 and 04 is 18m or less, façade to façade, excluding private outdoor amenity spaces. This may give rise to issues of privacy and overlooking. Whilst the Design Code includes minimum widths between buildings, it must also ensure that any privacy issues are anticipated and mitigated through fenestration and orientation of living spaces.

Architectural quality and materials

84. Overall, the indicative architectural concepts and material approach are supported, however, officers are concerned that the Design Code is not sufficiently detailed or robust to ensure this is delivered.

85. The Design Code sets out a clear approach to addressing massing and building heights through articulation of a base, middle and crown, as well as insets and setbacks allowing for variation and rhythm to be introduced across buildings. The Design and Access statement refers to the articulation of the façade of the mansion blocks, however this isn't translated into the Design Code. The Code must set out a robust set of guidelines to deliver on the high-quality design intent of the 'mansion block'. The high-quality design and articulation of the marker buildings must also be robustly secured in the Code.
86. The indicative material palette included within the Design Code is generally supported. However, the mandatory guidelines do not refer to any materials with the exception of plot 4 and there is ambiguity as to where the material quality will be translated into the reserved matters applications.
87. The Design codes must be updated to robustly secure the architectural and material quality, in order to comply with the requirements of Policy D3.

Fire safety

88. In line with Policy D12 of the London Plan, applications must be accompanied by a fire statement, prepared by a suitably qualified third-party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. Policy D5 within the London Plan seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users.
89. Fire Statements have been submitted for plots 1, 2, 4, 5 and 6 which have been approved by suitably qualified assessors. The Fire Statements should include the design team's commitment to achieving the highest standards of fire safety. The outline Fire Statements set out a range of fire safety matters relating to firefighting lifts, active fire safety measures, building access for emergency services means of escape and the inclusion of two staircases in every residential building. The Statements also confirm that residential buildings over 11m in height will be provided with a sprinkler system.
90. An update on fire safety will be provided at Stage 2, taking into account the comments raised from the consultees in relation to fire safety.

Agent of change

91. London Plan Policy D13 on 'agent of change' places the responsibility for mitigating impacts from existing noise and other nuisance generating activities or uses on the proposed new noise sensitive development through measures such as distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures. The development must demonstrate how noise generated from site surrounds such as the railway line has been adequately mitigated. This must be addressed prior to stage 2 and appropriately secured.

Inclusive access

92. London Plan Policy D5 requires that all new development achieves highest standards of accessibility and inclusive design. London Plan Policy D7 requires that at least 10% of dwellings meet Building Regulations requirements M4(3) 'Wheelchair user dwellings' and that all other dwellings meet Building Regulations M4(2) 'accessible and adaptable dwellings'. Whilst the Design Code refers to accessible wheelchair homes, this is not a mandatory requirement within the Code. This must be addressed and appropriately secured prior to Stage 2.
93. The Design Code includes a canal towpath strategy for DDA compliant routes. Whilst the Code acknowledges DDA routes and constraints within the site such as the existing bridges over the basins, the site wide inclusive accessibility is not identified and this needs to be appropriately secured within the Design Code. This should include the inclusive access across the site to both commercial and residential uses, as well as public spaces.

Heritage

94. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions 'should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'. If it is judged that harm to the heritage asset/s would arise from the proposed development, considerable importance and weight must be attributed to that harm, in order to comply with the statutory duty.
95. London Plan Policy HC1 states that proposals affecting heritage assets, and their settings should conserve their significance, avoid harm, and identify enhancement opportunities. The NPPF states that when considering the impact of the proposal on the significance of a heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. The NPPF states that in weighing applications that affect non-designated heritage assets, a balanced judgement is required having regard to the scale of any harm or loss and the significance of the heritage asset.
96. GLA officers consider that the following levels of indirect harm are caused by the proposed development (in all cases the assessment is based on the cumulative scenario).

Table of indirect (setting) impacts			
Heritage asset	Category of harm	Extent of harm	View reference
Kensal Green (All Souls) Cemetery, Registered Park and Garden, Grade I and the Kensal Green Cemetery Conservation Area (RBKC) and the listed buildings within it, including the	Less than substantial	Middle to high	Views 16, 17, 22L, 24A, 24B, 25A, 25B, 37-48 and 51-52

Anglican and Dissenter's Chapel and the Wellington Road gateway (see below) and the Northern Colonnade (Grade II), the cemetery walls and other gates (Grade II) and 154 tombs and monuments.			
Anglican Chapel, listed Grade I	Less than substantial	Middle	Views 37, 38L, 38R, 51
Dissenter's Chapel, listed Grade II*	Less than substantial	Low to middle	Views 22, 25A, 27, 44, 45L, 46, 47
The entrance gateway opposite Wellington Road, listed Grade II*	Less than substantial	Middle to high	Views 24A, 24B, 44
Kensal House, Ladbrooke Grove and Kensal Day Nursery, listed Grade II*	Less than substantial	Low to middle	Views 1, 2A, 2B
Kensal House, Harrow Road, listed Grade II	Less than substantial	Low to middle	Views 23, 27
Church of St John the Evangelist, Harrow Road, listed Grade II	No harm	No harm	View 22
Corporation Yard, listed Grade II	No harm	No harm	View 27
E M Landers Stonemason's Showroom, 605-609 Harrow Road, listed Grade II	Less than substantial	Low	View 22R
Ladbrooke Hall, listed Grade II	Less than substantial	Low	Views 9L and 9R
St Mary's Conservation Area (LBHF) and the listed buildings within it	Less than substantial	Low	Views 15, 49 and 50
Grand Union Canal Conservation Area	Less than substantial	Low to middle	View 13, 14, 25B, 26, 27, 29
Oxford Gardens/St Quintin Avenue Conservation Area	Less than substantial	Low to middle	Views 4-9, 11, 30 and 31
Queens Park Estate Conservation Areas	Less than substantial	Low to middle	Views 18-21 and 29
Queens Park Conservation Area	Less than substantial	Low	View 35 and 36

97. The development is harmful to the significance of the Registered Park and Garden, the Conservation Area, and the listed buildings within the area, as identified in the table above.

98. The Cemetery was intended to be "an informal landscape park with a number of formal features" (RPG listing description) and the original 1833 scheme included planned tree planting, some of which survives. Prior to construction of the gasworks, it would have been surrounded by countryside. Although the gasworks appeared from 1845 and its gasholders were visible from within the Cemetery, this is not considered to be a positive precedent and the gasworks was harmful to its setting. The removal of the gasholders has been beneficial to its setting, which

is now largely open beyond existing tree cover. A belt of trees bounds the southern edge of the Cemetery, and the central pathway crossing to the east of the Anglican Chapel also has a fairly dense planting of trees; however, most of the Cemetery has an open quality with a scattering of trees. As currently experienced, nearly all neighbouring development is low-rise and largely shielded in summer by these boundary trees; however, less so in winter. Surrounding development is more visible to the west of the Cemetery, including emerging tall buildings in the Old Oak and Park Royal Opportunity Area immediately to the west. The scale, massing, height, and proximity of the proposed development is highly visible within views into, within and out of the Cemetery, particularly at the eastern and southern areas.

Heritage benefits

99. The western canal basin is proposed to be reinstated between Plots 4 and 5 and this is a small but welcome heritage benefit.

100. The Ladbroke Grove rail crash memorial is proposed to be retained in its current location, with improvements made to the public access and also the quality of its immediate setting through a higher quality landscape design and planting (as indicated as part of the illustrative scheme). As a result, the local heritage (historic and communal) interest of this asset would be sustained and also to a degree enhanced by enabling its significance to be better revealed through improved access and appreciation within the public realm.

101. Historic England's Heritage at Risk Register for 2022 includes the Registered Park and Garden, the associated Conservation Area, the Anglican Chapel, the North Colonnade, the boundary wall and 23 of the tombs and monuments. If planning permission is granted, the harm caused to the setting of the cemetery and the assets it contains should be partly mitigated through planning conditions and Section 106 Agreement terms requiring a full heritage benefits package including:

- Financial contributions to the repair of key buildings within the Cemetery, including the Anglican Chapel.
- Financial contributions to reinstate lost tree planting within the Cemetery, and potentially adding to the boundary trees to enhance screening of the development.
- Historical interpretation panels showcasing the gasworks' history.

102. Overall, the proposals would cause less than substantial harm to heritage assets, including a middle to high level of less than substantial harm to heritage assets of the highest significance. As harm has been identified, the proposals do not comply with London Plan Policy HC1 and officers attach considerable importance and weight. In accordance with paragraph 207 of the NPPF, harm must be demonstrably outweighed by public benefits. It is noted that the currently low level of affordable housing reduces the weight that can be attributed to this in the planning balance. Once the final package of public benefits is agreed, the final balancing exercise will be carried out at Stage 2.

Transport

Trip generation

103. Trip generation for the existing site is based on survey data which, as agreed at pre-application, forms an acceptable baseline. The trip generation for the proposal has been derived using a combination of survey and TRICS data; the petrol filling station is removed from the future scenario, and this will need to be secured as part of any permission with timing to be agreed.
104. The proposals increase the supermarket floorspace by 25% in terms of net sales area and the TA assumes that the base customer demand remains the same, plus a 10% uplift from the new residential units within scheme plus additional vehicle trips generated by an enlarged Goods online facility. This methodology is broadly acceptable, but the supermarket demand should be adjusted to reflect that a new larger supermarket will inevitably attract some additional customers, in addition to the internally generated demand from residential development.
105. The TRICS database has been used to derive the residential trip generation with manually adjusted census data used to derive the mode share, accounting for the distance to access LU / Rail services. This results in 1,176 and 844 two-way trips in the AM and PM peaks respectively. In terms of mode share, it is assumed that given the distance to LU/Rail that 50% of these trips will be accessed by bus. This is agreed. Use of census data gives a 14% car mode share in the AM peak – this exceeds strategic mode share targets and is unlikely to be realised given the restrained level of car parking (noting below comments that all general residential car parking should be removed). However, it is agreed that it should be retained for assessment purposed to ensure a robust highway impact assessment. Residential mode share will need to be monitored and where targets are not met, measures implemented to reduce car mode share to a maximum of 10% in line with London Plan policy T1. The mechanisms for doing this will need to sit within a complex travel plan and monitoring plan with appropriate obligations including bonds secured within the s106 agreement.

London Underground impact assessment

106. Full comments on this will be supplied to the Council and applicant; it is however important to highlight that there are issues with assessment methodology used; revisions, additional calculations and information on the station and train capacity are needed to fully understand the development impacts. Once completed in line with TfL guidance, the development impacts on staircases, gateline and train capacity will need to be mitigated accordingly, in line with London Plan policy T4.
107. As reflected in the SPD, and across wider strategic and local policies, there is an expectation that development will support the delivery of improved accessibility on the public transport network. A feasibility study has been completed for the delivery of Step Free Access (and capacity) scheme at Ladbrooke Grove station and any permission will need to include a proportionate

contribution towards its delivery in line with London Plan policy T1 which states that development proposals should facilitate step-free access to LU stations.

Buses Strategy

108. The methodology should be revised as TfL officers do not agree with the distribution of trips across all bus routes equally; this is an unrealistic proportion and does not reflect that in peak hours some routes are likely to be more significantly impacted. The distribution of bus trips should be refined using TfL's BUSTO dataset to ensure passengers are assigned across the routes in a more appropriate manner.
109. The below comments are based on the bus impact assessment as presented in the TA, notwithstanding the above comments on assignment across routes; the majority of the mitigation required is linked to additional mileage of bringing buses into the site and the journey time delays, rather than passenger numbers. The below will be confirmed once the redesign of the access junction is complete but should be used as an indication of the mitigation requirements and fed into viability work.
110. The cost to mitigate the uplift in passenger demand and extension of routes (additional mileage) into the site is estimated to be £670,000 per year for five years, totalling £3,350,000, indexed from 2023. This is the minimum contribution that will be required in the scenario where the access junction is redesigned to fully mitigate the journey time delays presented in chapter 7 of the TA.
111. If a suitable junction design is not explored and journey times are as currently proposed, considering the above basic costs of mitigating uplift in demand, extending routes into the site plus mitigating the journey time delay, involving adding additional peak hour buses to every route, the cost to mitigate the impact on bus journeys is estimated at £1,450,000 per year for five years, totalling £7,250,000 which will be sought from the applicant in line with London Plan policy T4.
112. Despite the need for additional assessment, TfL feels it is important to highlight the scale of impacts and mitigation stemming from the development. These figures should be worked into the viability workstream while the work to improve the junction design is progressed to improve its functionality and reduce journey times delays.
113. At present there are bus stops located on Canal Way, approximately 50m from the store entrance. The proposed design includes bus stops around the site including at the supermarket and further west within the site. Further detailed comments will be provided to the Council and applicant regarding the design and location; but it should be highlighted that securing sufficient stops as part of any permission is a crucial part of delivering sustainable and accessible travel options within the OA.
114. Bus stands are currently at the front of the site on Canal Way. The development proposals re-locate these to the southwestern corner of the site adjacent to the Sainsbury's servicing yard. This bus standing facility is crucial to

the on-going operation of the bus network in this part of London therefore must be re-provided to TfL's satisfaction in line with London Plan policy T3.

115. Four stands are proposed which meet TfL's quantum requirements. However, the detailed design of these stands needs to be revised prior to determination to ensure safety of all road users.
116. The location directly adjacent to the servicing yard of the supermarket is a concern; tracking to show how HGVs and LGVS (including goods online vehicles) would manoeuvre with buses is required, alongside details of how queues and incidents such as breakdowns would be managed to ensure the bus network can continually operate.
117. An illustrative location for new driver welfare facilities adjacent to the stands has been provided, however it is noted that this area is within the outline part of the application – any permission will need to include obligations ensuring that welfare facilities to TfL's specification are delivered in tandem with the introduction of the bus stands. The adjacent plots will also need to be delivered to make the stands and welfare facilities an attractive and safe environment with passive surveillance and lighting. As requested at pre-application stage, the area around the bus stands and welfare facilities should be assessed against the 10 Heathy Streets Indicators and be the subject of a Crime Survey.
118. All property matters, leases and licences to run buses within the site in perpetuity will need to be secured within any future permission.

Highway impacts

119. The Kensal Canalside SPD recommends the current mini roundabout arrangement be upgraded to facilitate additional highway capacity, reduce congestion, improve conditions for pedestrians and cyclists, and improve air quality; crucially high-quality pedestrian and cycling facilities are required to serve the OA.
120. The applicant has submitted local highway modelling in support of the application. The focus of the modelling is to assess the impact of the introduction of a signalised junction in the place of the existing mini roundabout located on the junction of Canal Way and Ladbroke Grove. It should be noted that the junction layout presented by the applicant differs to that recommended as part of the SPD – whereby although delays occurred, they were less severe, and the model operated within capacity.
121. The applicant's future year with development highway model has not been signed off as fit for purpose by TfL; therefore, detailed conclusions based on modelling outcomes cannot be given, nevertheless the model in its current state, does give indications of some concerning outcomes across modes. This includes significant increases to queue lengths and journey times, including adverse impacts on buses. As currently presented, the proposals are contrary to London Plan policies T2, T3(E) and T4(C).

122. In addition to the above issues, the junction design as submitted does not deliver any tangible benefits for pedestrians and cyclists, with very long wait times for the 'green phase', and the design does not reduce cycle severance. This is contrary to London Plan policy T2.
123. TfL has already suggested various changes to the design and modelling for the junction to the applicant team which may alleviate the above issues. These should be actioned alongside detailed discussions with TfL and the Council as highway authority to bring forward an acceptable junction scheme and site access to the OA.

Internal layout and circulation

124. Beyond the site access and primary two-way road to the Sainsburys supermarket along its southern edge, secondary one-way roads around the western and northern edges of plot 2 running one-way in a clockwise direction are also proposed. Provision for the future development of Plot 3 via a separate planning application is included in the general street layout. A series of pedestrian routes and cycleways through the site are also proposed. Further info on the widths and design of cycle routes needs to be provided and secured. The function of South Drive running along the southern edge of plot 2 also needs to be considered further to balance the route as an access to the supermarket servicing yard, bus stands, residential units and community space.
125. The connections over the railway line and canal would be beneficial in providing additional active travel connections from the site, acknowledging that there are currently limited options. However, there are limitations that must be addressed; the key ones being that the bridges are unfunded, rely on third party land, and in relation to the bridge on the GWML, would rely on the development of other parcels of land within the OA coming forward for the benefits to be realised. Therefore, the proposals must contribute towards the delivery of this infrastructure and demonstrate how the site functions successfully without the connections. The applicant will need to demonstrate that connections are suitable for pedestrians from all walks of life and are perceived to be safe and attractive at all times.

Healthy Streets

126. As identified in Policy T2 of the London Plan, all developments should seek to deliver improvements that support the Mayor's Healthy Streets approach. The Healthy Streets approach seeks to improve air quality, reduce congestion, and make attractive places to live and work. There are ten Healthy Streets indicators which put people and their health at the heart of decision making and aim to result in a more inclusive city where people choose to walk, cycle, and use public transport. As part of the Transport Assessment (TA), applicants are recommended to assess the walking and cycling routes to key destinations from their site against the Healthy Streets indicators at all times of day.
127. The applicant team mapped 7 routes. TfL will provide detailed comments on the methodology and the outputs to the Council and applicant, but to summarise there are issues with the methodology including the use of a desktop assessment

which is not supported, inconsistencies and inaccuracies in the reporting and the recommendations.

128. Eventually, in line with London Plan policy T2, a wide range of contributions / works in kind to support active travel by occupiers and visitors to the site to key destinations will be required to support the new community. This will need to include enhancements to night time conditions to support the Mayor's Violence Against Women and Girls (VAWG) Strategy for London.

Car parking

Commercial

129. The proposed retail car parking is proposed to be reduced from 396 to 227 spaces. Using a PTAL of 4 (future with development scenario), this would allow for a maximum of 1 space per 75sqm GIA, or 306 spaces. Although the reduction is supported and the methodology for calculating the allowed number of spaces is agreed, London Plan policy notes that retail car parking 'should be kept to a minimum' and several issues need to be resolved before the final superstore car parking numbers and layout can be agreed. Fundamentally, the site access and highway impacts need to be resolved. The fact that the car parking accumulation surveys carried out at peak times between 2021 and 2023 show peak demand above 227 spaces also needs to be resolved by reducing car based demand.

130. A Car Park Management Plan (CPMP) has been submitted, the initial principles are supported but it omits to address the above issue of the maximum car parking demand and how this can be addressed to prevent adverse impacts on the function and safety of the internal streets, including the circulation of buses. Peak car parking demand will need to be reduced and managed through a range of measures including a robust charging regime, best in class home delivery offer and incentivising use of sustainable modes. A system whereby car park occupancy and congestion are monitored and linked to charging mechanisms will need to be put in place; and secured within the S106. Staff car parking must be limited to spaces for disabled persons only; the CPMP suggests that staff travelling during the late evening with concerns over safety or availability of public transport could also be allocated spaces – this a wholly unacceptable approach given that the majority of residential development will be car -free and it is the developers responsibility to ensure that all occupiers, staff and visitors to the development can safely access the site at all times of day / night.

131. In relation to the remainder of the commercial uses, no general car parking is proposed, which is supported. The provision for disabled persons parking spaces in safe and convenient locations must be identified.

Residential

132. The application includes 345 car parking spaces for the 2,519 units. Each plot has a different indicative mix of general and disabled persons parking. Plots 2 and 5 fail to meet the London Plan requirement for 3% of units to have a disabled persons parking space from the outset.

133. Overall, the proposed parking ratio for the residential element of the scheme is 0.14 spaces per unit. As advised at pre-application stage, the residential element of the scheme should be car-free in line with strategic policies to encourage sustainable travel and reduce the negative impacts of private car use in London. In the first instance, TfL recommends that the disabled persons car parking is resolved to ensure policy requirements are met on individual plots. General car parking should be deleted from the scheme, particularly given the above-mentioned issues with highway congestion and bus journey times, it will be critical to minimise the vehicle trips generated by the site. In addition, the TA is silent on how the general and disabled persons parking spaces would be managed and allocated to prevent misuse and ensure only used by those who need them. Active charging facilities for electric vehicles would be fitted to 20% of spaces with passive provision for the remainder.

Cycle infrastructure and parking

134. Detailed comments on the cycling proposals will be provided to the Council and the applicant. In summary, the proposed cycle provision is not continuous and does not represent a step change in cycling facilities that TfL expects from an OA, nor do the proposals connect to the strategic cycling network. On-site, there are some positive suggestions for cycling but further detail is required on the design and operation is required.

135. The cycle parking for the residential blocks within plot 2 is proposed to be located within the basement beneath the Sainsburys supermarket. Given that this is in detail, the layout and quantum of cycle parking must be provided and the London Cycle Design Standards (LCDS). The remainder of the cycle parking is included in the outline element and is indicated as being located within each plot. The quantum, mix and quality must reflect the requirements of the London Plan and the LCDS, and this must be appropriately secured. The approach to the retail/commercial floorspace within the outline element is broadly acceptable again subject to detailed design and ensuring compliance with the LCDS. This must be appropriately secured.

136. There are several issues with the cycle parking for the Sainsburys supermarket. Primarily the location of the cycle parking, including most short stay spaces, are at the back of the basement car park – in a poor location, hidden away and unlikely to encourage employees or customers to cycle, with risk of user conflicts between cyclists and drivers within the car park. The location should be revised having better regard to the LCDS and with a focus on safe, accessible, and convenient cycle parking. Spaces for cargo bikes, both customers and potential local superstore deliveries, should be identified. The location of the short stay cycle parking at ground floor level near the entrance of the Sainsburys supermarket are much more successful.

137. The applicant broadly accepts the need for additional cycle hire provision to serve the site. Funding and land will need to be secured for on-site provision, with indicative locations identified and agreed by TfL and the Council, alongside funding for off-site expansion to extend the scheme to the OA.

Deliveries and servicing

138. A delivery and servicing plan for the supermarket has been submitted. This contains measures to manage and mitigate the impacts of these movements. All vehicle parking and operations are proposed to take place within the service yard, including the spaces for increased Goods Online offer, increasing the fleet from 5 to 15 vans. Tracking for the movements of the largest vehicles should be provided.
139. In line with the strategic targets to reduced emission and vehicle dominance, detail of how the Goods Online offer will meet policy including provision and location of cargo bikes, and EV and e-bike charging.
140. The access to the service yard and the associated vehicles on South Drive should be tracked alongside buses using the standing spaces to ensure the two uses can operate safely and efficiently in tandem.
141. An outline DSP for the remainder of the developer proposals has also been submitted. This identifies access via the Ladbrooke Grove / canal way junction, leading to various loading bays around the site, linked to the individual plots. It also includes targets for servicing vehicles to the residential scheme to reduce by 10% over the first 5 years of occupation; this and other targets will need to be secured by s106 agreement. Full DSPs must be secured by condition in line with London Plan policy T7.
142. Suitable arrangements for taxis/PHVs serving all land uses are not identified within the submission. Both the residential and supermarket elements of the scheme have the potential to generate a number of taxi movements throughout the day and these will need to be catered for in a safe, accessible and convenient locations for each plot, ensuring that taxi / PHV movements do not impede active travel or bus movements.

Construction logistics

143. An outline CLP (Construction Logistics Plan) has been submitted in support of the application. This provides indicative routing for demolition and construction vehicles (from the north via Harrow Road) and estimated vehicle numbers. TfL officers have several detailed queries around the numbers and phasing that will need to be discussed with the applicant and Council. Further information regarding the safety of vulnerable road users (pedestrians and cyclists) during the demolition and construction phases needs to be demonstrated. In addition, to how users of the new superstore and other assets (including bus stops and stands) will be protected throughout the construction of the residential above.
144. Agreement is required on the delivery of the junction scheme at Canal Way and Ladbrooke Grove, in whatever final design is agreed, or potentially an interim scheme, and how the timing and design fits with the construction phasing. Similarly, the delivery of temporary and end state bus infrastructure and how these fit with the construction and occupation of the various phases needs to be agreed.

145. Final detailed CLPs for each phase would need to be secured as part of any permission and approved by the Council and TfL prior to commencement of each phase, in accordance with London Plan policy T7.

Sustainable development

Energy strategy

146. The London Plan requires all major developments to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2021 Building Regulations should be met on-site. Only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site a contribution to a carbon offset fund or reductions provided off site can be considered.

147. An energy statement has been submitted with the application. The energy statement does not yet comply with London Plan Policies SI2, SI3 and SI4. The applicant is required to further refine the energy strategy and submit further information to fully comply with London Plan requirements. Full details have been provided to the Council and applicant in a technical memo that should be responded to in full; however outstanding policy requirements include:

Be Lean – further clarifications on specification and further measures on the non-domestic element;

Managing heat risk – Further details to demonstrate the cooling hierarchy has been followed. as currently non-compliant with Policy SI4.

Be Clean – further exploration of DHN potential and energy strategy to be futureproofed for connection to future DHN;

Be Green – demonstration that renewable energy has been maximised, including roof layouts showing the extent of PV provision and details of the proposed air source heat pumps;

Be Seen – confirmation of compliance with this element of policy, with compliance to be secured within the S106 agreement;

Energy infrastructure – further details on the heating strategy and on the design of future district heating network connection is required, the future connection to the DHN must be secured by condition or obligation;

Carbon savings

148. For the domestic element of the scheme, the development is estimated to achieve a 61.5% reduction in CO2 emissions compared to 2021 Building Regulations. As such, a carbon offset payment is required to be secured. This should be calculated based on a net-zero carbon target using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the borough's carbon offset price. The draft s106 agreement should be submitted when available to evidence the agreement with the borough.

149. For the non-domestic element, the development falls short of the net zero-carbon target in Policy SI2, although it meets the minimum 35% reduction on site required by policy. As such, a carbon offset payment is required to be secured. This should be calculated based on a net-zero carbon target using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the borough's carbon offset price. The draft s106 agreement should be submitted when available to evidence the agreement with the borough. For the outline element, the carbon savings estimations are required.

Whole Life-cycle Carbon

150. In accordance with London Plan Policy SI2 the applicant is required to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint.

151. The applicant has submitted a whole life-cycle carbon assessment. The WLC assessment does not yet comply with London Plan Policy SI2. Further information is required to demonstrate compliance with the London Plan, this is set out in the memo sent to the applicant and LPA.

152. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. The template and suggested condition wording are available on the GLA [website](#)¹.

Circular Economy

153. London Plan Policy D3 requires development proposals to integrate circular economy principles as part of the design process. London Plan Policy SI7 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, following the Circular Economy Statements LPG.

154. The applicant has submitted a Circular Economy Statement in accordance with the GLA guidance, including a complete CE template. The Circular Economy Statement does not yet comply with London Plan Policy SI7. Further detailed comments have been provided to the LPA and applicant in the CE memo. The scope of the CE statement is unclear, as it is stated that the CE statement focuses on the detailed elements of the development, and only the outline application stage tab has been completed in the CE template. The scope of the assessment must be clarified, along with updated reporting in line with the most recent guidance (March 2022) and completed outline and detailed tabs of the CE template.

155. A detailed Circular Economy Statement should be secured by condition for each Reserved Matters application.

¹ <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>

156. A condition should be secured requiring the applicant to submit a post-construction report. The template and suggested condition wording are available on the GLA [website](#)².

Digital connectivity

157. A planning condition should be secured requiring the submission of detailed plans demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development in line with London Plan Policy SI6.

Environmental issues

Urban greening

158. The proposed development achieves a site-wide UGF score of 0.4, and meets the recommended minimum threshold for residential-led development set out in London Plan Policy G5. An acceptable UGF score should be achieved within each development phase to ensure adequate levels of urban greening across the masterplan.

Sustainable drainage and flood risk

159. A Flood Risk Assessment has been submitted with the application. This adequately assesses the risk of flooding from fluvial/tidal, pluvial, sewers, groundwater and reservoir flooding, and when mitigation measures are considered, the residual flood risk to the site is low. The FRA for the proposed development generally complies with the London Plan Policy SI.12.

160. The drainage strategy proposed to restrict side wide runoff to 120 l/s (Q200), and given that space is constricted due to sewers under the site, the larger number of SUDS and discharge to a watercourse, this is acceptable. In the event that it is not possible to discharge into the canal, a new drainage strategy would need to be provided. The drainage strategy proposed green/blue roofs, bioretention tanks, permeable paving, rain gardens and rainwater harvesting, which is welcomed.

161. The proposed development targets policy compliant targets for residential and non-residential water consumption which is welcomed and should be appropriately secured.

Air quality

162. The proposed development is air quality neutral for building emissions, however, it is not air quality neutral for traffic emissions. It should be ensured that mitigation measures are targeted towards reducing the number of car trips and/or

² <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance>

mitigating the impact arising from road traffic associated with the operation of the development.

163. In addition, conditions are required to secure that plant and machinery complies with Low Emission Zone standards and that measures are in place to control emissions during demolition and construction relevant to a high risk site, in order to comply with London Plan policy S11.

Biodiversity

164. London Plan Policy G6 states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain. Trading rules should also be satisfied.
165. The application supporting evidence demonstrates that the proposed development secures a net biodiversity gain of 648.88%, in accordance with Policy G6(D). The applicant also states that trading rules have been satisfied
166. The Preliminary Ecological Assessment (PEA) states that the proposed scheme has the potential to indirectly impact on the Kensal Green Cemetery, London's Canals and British Rail Western Region Land SINC's through increased pollution noise, lighting, shading and recreation. As such, the PEA provides an assessment of these construction related impacts to the SINC and possible mitigation options.
167. It is acknowledged that the development has the potential for long term impacts on the surrounding SINC's, due to shading and recreational pressure and short-term impacts on bat commuting routes. The applicant should provide an assessment of these direct and indirect impacts and mitigation options prior to Stage 2.

Equalities

168. The Equality Act 2010 provides that in exercising its functions (which includes the functions exercised by the Mayor as Local Planning Authority), that the Mayor as a public authority shall amongst other duties have due regard to the need to a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act; b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
169. The protected characteristics set out in the Equality Act are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. The Equality Act acknowledges that compliance with the duties set out may involve treating some persons more favourably than others, but that this does not permit conduct that would otherwise be prohibited under the Act. In addition to assessing the impact of the proposals on the existing residents of the social homes on site that will be demolished, further information is required

to fully assess the impact of the proposals on the carnival and how its use can continue through the construction period. This must be set out prior to Stage 2.

Local planning authority's position

170. Kensington and Chelsea Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting.

Legal considerations

171. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

172. There are no financial considerations at this stage.

Conclusion

173. London Plan policies on opportunity areas, commercial and community uses, housing, affordable housing, urban design, tall buildings, heritage, transport, energy, climate changes, urban greening and biodiversity are relevant to this application. The application does not currently comply with these policies, as summarised below:

- **Land use principles:** The redevelopment of a brownfield site within an opportunity area for a residential-led mixed use development, which would deliver up to 2,519 homes is strongly supported.
- **Housing and affordable housing:** The proposal would provide 25% affordable housing by habitable room, 20% by unit. In addition, the 16 existing social rent homes will be replaced on site, with phasing, tenure and security of tenure being secured. This is a low level of affordable housing considering the scale and nature of the proposed development. GLA

officers are scrutinising the Viability Assessment to ensure that the development delivers its maximum contribution to affordable housing.

- **Urban Design:** The proposed heights would be contrary to the locational requirements of part B of policy D9 and further information is required to comply with the qualitative assessment set out in Policy D9. The Design Code is not considered to robustly secure high-quality development and must be addressed prior to the Mayor's decision-making stage.
- **Heritage:** The development would result in medium to high level of less than substantial harm to the significance of designated heritage assets. The harm must be outweighed by public benefits of the proposals.
- **Transport:** Concerns are raised with the site access as it does not adequately cater for walking and cycling, and has adverse impacts on the highway network and on bus journey times. Significant contributions towards public transport are required, as well as additional information relating to the design of the Ladbroke Grove junction, car and cycle parking, active travel, internal and external movement strategy and freight.
- Further information on **Energy, Whole Life Carbon, Circular Economy, Air Quality** and **Biodiversity** is required prior to the Mayor's decision making

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