

Kensal Rise Residents Association **NW10**

July 2019

Decision: The Kensal Rise Resident Association (KRRRA) is unable to support the scheme and proposals as put forward in the July 2019 detailed design consultation for the Kensal Corridor.

KRRRA believes there is a disconnect between what Brent Council (“the Council”) and Kensal Rise residents perceive to be the priorities and expectations for the Corridor and Station Terrace area.

A re-work of the scheme and its proposals is requested and KRRRA would be happy to work constructively on this with the Council.

Preamble

The Kensal Corridor scheme is of particular interest to KRRRA and the wider Kensal Rise community as much of the proposed scope falls in the heart of the Kensal Rise district.

KRRRA therefore welcomes the opportunity to respond to this second consultation on the Kensal Corridor, otherwise known as Chamberlayne Road and Station Terrace, where KRRRA speaks for, and is supported by, hundreds of local residents.

The scheme is of interest to the KRRRA as a large section of the proposed scope falls in the heart of the Kensal Rise district. Any proposals that are implemented will have a direct impact on Kensal Rise residents within our boundaries of: Chamberlayne Road (East), Hardinge Road (North), College Road (West), Mortimer Road (South) which form a large majority of the length of Chamberlayne Road most impacted by the Kensal Corridor scheme.

The consultations – our view

The KRRRA raised a petition in 2016 signed by 1,500 local residents for cleaner buses / cleaner air for Chamberlayne Road. It is clear from these figures that residents want cleaner air.

The proposals for the first Kensal Corridor consultation held in March 2018 were high-level and short on detail, limiting KRRRA’s ability (and in our view, many consultees’ ability) to make a full and proper assessment.

KRRRA had hoped to see more detail and assessments in the July 2019 consultation, in particular how the proposals would deliver the intended outcomes to address the objectives identified in the consultation of improving traffic flows and journeys, reducing congestion and associated pollution, improving cycling and pedestrian conditions.

Unfortunately, the consultation contains absolutely no information let alone assessments or modelling, to show how illegal levels of air pollution will be reduced or how much bus journey times would be improved by the proposals.

Finally, we are facing a climate crisis and environmental collapse that threatens human kind’s existence and life on Earth as we know it unless we radically reduce greenhouse gas emissions immediately. Carbon dioxide emissions from the transport sector represented the large source of emissions in the UK at 34% according to the Department of Business, Energy and Industrial Strategy.

It is common sense that any urban planning proposal strives to discourage gas and diesel-powered vehicles as much as possible. We strongly encourage you to reconsider and revise the proposals to demonstrate the Council has heeded these universal warnings that threaten our children’s lives.

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This is no longer a matter that can be left to national governments or international alliances. Every local government must act now.

Improving traffic flows / reducing congestion

Chamberlayne Road is an unclassified road, designed to withstand only local traffic. (Department for Transport, 2012).

Congestion is a major issue along Chamberlayne Road. The Corridor interacts with Harrow Road and Ladbroke Grove and junctions along that route operate close to or at capacity in peak periods, slowing speeds significantly.

A study of Chamberlayne Road by Imperial College in 2018 revealed that traffic volumes witnessed in the surveys are typically two times higher than the average UK road, and almost three times higher than the average evening peak hour traffic count. Origin and Destination (O&D) survey results revealed this congestion is primarily caused by through traffic passing along Chamberlayne Road.

The current proposal aims to reduce “congestion and associated pollution” but contains no traffic interventionist measures that would reduce traffic volumes along the Corridor.

There is simply too much traffic forcing its way through the Corridor. This causes chronic congestion during peak periods, slower journeys for bus and motor traffic, illegal air quality conditions and endangers both cyclists and pedestrians.

Department for Transport (DfT) data show that in the southern end of the Corridor - Harrow Road / Chamberlayne Road junction, the total average annual daily flow i.e. vehicles per average day, between manual count points 8492 (A404) and 17015 positioned either side of the Harrow Road/Chamberlayne Road/Ladbroke Grove junction, was 14,684 and 19,218 vehicles, respectively in 2017. Counts for 2018 are broadly the same as 2017.

For Ladbroke Grove Road alone, manual count point 73643 recorded the average annual daily flows towards and away from Chamberlayne Road as 49,387 vehicles travelling East and 47,385 West.

The absence of any credible traffic interventionist measures in the detailed design to address this extreme level of traffic in the southern end of the Corridor, makes it very difficult to see how “congestion and associated pollution” is to be reduced.

The proposed narrowing of Chamberlayne Road at its southern end will only cause vehicles to slow down, compounding the problems of slower bus journeys, congestion and illegal levels of air pollution. Further, with no dedicated cycle lane, cyclists will be at greater risk of serious injury or death.

In view of these concerns, KRRA opposes the scheme and proposals as they stand.

Reduce associated pollution

Every year, nearly 9,500 Londoners die from air pollution, including over 200 people in Brent. Air quality along the Corridor and Station Terrace is at currently illegal levels, largely caused by the volume of diesel traffic going through the area – 11,500 diesel buses and

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70,000 vehicles weekly, of which 62.9% are diesel¹ according to the 2018 Imperial College study of Chamberlayne Road.

The highly illegal air quality environment prevailing along Chamberlayne Road and in the Station Terrace area is a major concern for residents. However, there are no credible proposals to address this. Nor has the Council provided any results from modelling or environmental impact assessment to demonstrate that the proposals would mitigate air pollution.

Vehicles – bus and motor – are the main causes of the illegal air quality condition in the local area. Congestion during rush hour is often at stand still - a cause of more emissions.

Imperial College's O & D surveys revealed that 64.3% of through-traffic journeys started outside the borough with 25.8% starting or ending their journey in Queen's Park Ward.

With the majority of journey origination from outside the borough, these drivers evade the Council's £30 surcharge levied on diesel vehicles. Yet their presence in the area compounds Kensal Rise's already illegal air quality environment, which the planting of a few trees will not resolve.

Ark Franklin Primary Academy on Chamberlayne Road is one of the worst polluted schools on London's worst polluted roads according to the Mayor of London's Air Quality Audit 2018 for schools. Children are particularly vulnerable to the harms caused by air pollution – asthma, stunted lung growth, cognitive brain damage etc.

Article 2 of European Convention on Human Rights – enshrined in UK law by the Human Rights Act - protects a human being's right to life. This means that nobody, including the Government, can try to end a life. It also means appropriate steps to protect if a human being's life is at risk. The Article also states that:

“Public authorities should also consider a **human beings' right to life** when making decisions that might **put them in danger or that affect their life expectancy**”.

To proceed with proposals that do not reduce traffic volumes and pollution is nothing less than a negligent and irresponsible breach of Article 2 on the part of the Council and its officials.

Station Terrace proposals

The proposals are largely to improve bus movements in this locality and the streetscape. There is a proposal to modify and extend / increase the number of bus stands adjacent to the storage containers 2 to 4, as well as convert the existing car park next to the Kensal Overground station into a pocket park / public realm seating area.

It is the latter two proposals that are of great concern to KRRA and the Kensal Rise community. 350 residents signed a petition (**attached**) opposing the re-positioning and addition of an extra two bus stands to those currently by the storage containers. Residents and businesses want this space to be allocated to initiatives that would benefit the community such as a decently sized weekly farmers' market.

¹ A Study on Air Quality in Brent On Behalf of Clean Air for Brent, Imperial College London MSc Environmental Technology, Calvin Chan, Tiffany Cheung, Adeline Loo, Violet Ross 6-8-2018, Copyright © 2018 Calvin Chan, Tiffany Cheung, Adeline Loo, Violet Ross

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The EU limit for Nitrogen Dioxide (NO₂) deemed fit for humans is 40µg/m³. Testing for NO₂ emitted by the Chamberlayne bus routes showed that emissions were over 100µg/m³ by the Tesco's in Station Terrace. These findings were shared with the Council by email on 21 July 2019 with no response or received to date. The results are re-attached again.² These tests were commissioned by Kensal Rise Action Group and undertaken by James Hewitt, an Environmental Consultant in June 2019.

As per Article 2, the Council as a public body has a duty to protect human beings from danger and threats to their lives. In light of these findings – a public health crisis – it would be highly negligent and irresponsible of the Council to proceed with its proposals and position the bus stands adjacent to the new pocket park and in close proximity to humans.

Many people pass this area daily as they arrive at, or leave, the station, or walk or cycle from the eastern residential areas to patronise the businesses in Station Terrace and Chamberlayne Road. The current positioning of the two bus stands next to the containers is adequate, and not a threat to health as they are at distance.

The bus route 28 transports just 2.4 passengers on average per service; each of its 250 double-decker Chamberlayne services has the capacity to transport up to 87 passengers.

It is incongruous to introduce more bus stands to an area already heavily dominated by vehicle storage (cars and buses), and in the context of the recent reduction in bus service frequency of the 52 and supposedly 452 routes.

In the context of the outer London borough bus services review to be drawn out over seven years, it is difficult to see the benefits to Kensal Rise residents for storing more buses which will only go to obstruct the view of the newly created community space.

Route 28 travels the 1 mile from Westbourne Park Bus Garage depot to Kensal Rise, routinely more or less empty, simply to stand for 7 minutes in Station Terrace, before it turns around to travel back toward the direction of the garage, again more or less empty.

If more bus stands are required, these could be established in Westminster, particularly for buses that largely service that area. In fact, until five years or so ago, route 28 used to stand at Harrow Road/ Elgin Avenue. Excess buses from route 452 could also be stood at Sainsbury's interchange, which is considerably less residential in character.

Proposals for cyclists

The proposal to narrow sections of the Corridor highway will mean that cyclists who are already vulnerable will face even more dangers of being hit by a lorry or a car.

KRRA does not accept the concept that cyclists should be required to cycle in the middle of the road in 20-25mph traffic (minimum) and suffer dangers that this would inevitably bring.

KRRA does not accept that a dedicated cycling lane should be in operation only in the northern and not southern section of the scheme. This needs to be continuous, uninterrupted for the length of the Corridor if the Council is indeed to be credible in encouraging more sustainable modes of transport to adapt to the global climate crisis.

² An EnviroSensor Air Quality monitor, widely used by local authorities across the country, was used for these tests.

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Parking proposals

The focus on providing parking for non-residents – pay and display – is a major concern, especially as Brent Borough Plan 2019 - 2023 and Mayor's objectives advocate for less traffic dominated high-streets.

With the climate crisis being reported at all levels of society everywhere in the world, and the recently passed Climate Emergency motion by the Labour Party, it is very disturbing that the Council seems to have ignored these severe warnings.

Most local residents walk to the high street anyway. Kensal Rise has a plethora of public transport options, making trips to and from the high-street easy.

Reducing pay and display parking provision for outsiders would certainly release more and safer road space capacity for cyclists.

Re-surfacing of Chamberlayne Road and its footways

We welcome the council's use of this opportunity to fully resurface pavements including curtilages. Given the proposal to realign curbs and parking areas, it is also positive to see the road surface is being renewed as part of the annual programme, and outside of this scheme. We are mindful that resurfacing needs to be to a suitable depth to ensure the subsiding road surface does not reoccur. On that point, we note the severe buckling on Kilburn Lane that has already occurred despite just being resurfaced.

Conclusion

For the reasons outlined above KRRRA cannot support the scheme and proposals as they stand.

Recommendations

In the spirit of constructiveness KRRRA proposes the following ideas:

On traffic flows, congestion and illegal air quality environment, and poor road safety environment that Brent Council and TfL:

1. Re-work the proposals so that they are fit for purpose, delivering on intended outcomes: improved traffic flows, better bus journey times, reduced congestion and associated pollution, improved road safety conditions for both cyclists and pedestrians and fair and equitable parking provision for residents and local business.
2. Fully and properly consider the implementation of an Automatic Number Plate Recognition (ANPR) operated traffic filter management system (TfMS) for Chamberlayne Road, to allow only buses, residents, local business and local deliveries to travel minus penalty along the Corridor at eg, peak rush hours in the morning. This would reduce current cut through traffic that comes from outside Queens Park ward by 50%, thereby reducing one of the causes of the Corridor's transport induced problems.
3. For effective ward traffic management, it is advised that the ANPR scheme is implemented on Salusbury Road and key roads that provide entry points to the ward to deter cut through traffic coming from outside the ward. (Such traffic should be using the surrounding A roads anyway).

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4. The cost of cameras is modest in the context of the current Kensal Corridor scheme. The scheme would require four cameras plus installation. A quote was obtained and the total cost of four cameras is approximately £20,000.

On the **bus stands proposal (area ringed in red in the picture below)**, the Council and TfL abandon the proposal to extend and increase the bus stands in the Station Terrace area to prevent diesel buses blocking the proposed new public seating area next to the station.

It is very clear that residents do not want Station Terrace dominated with buses. In just 3 days, 350 Kensal Rise residents and local business owners signed a petition opposing the bus stand proposal because:



1. Human beings (public realm seaters, pedestrians, commuters using the overground station, and station staff) would be brought closer to diesel buses and be involuntarily exposed to illegal levels of Nitrogen Dioxide (NO₂) from TfL's diesel buses;
2. Given its proximity to the buses, the new public seating area would soon become a hotspot pocket pollution park;
3. With the screening of the public seating area by the high-sided buses, it is likely to become a magnet for anti-social behaviour shielded from public view and deter the public from using the park. Note: the public stairs adjacent to the station is already used frequently by IV drug users and people drinking alcohol.
4. What local residents and business want for this space is a weekly farmers' market. There is a long-established market operator ready to do this but will be unable to if this space is used by TfL to store even more buses. For a viable market proposition, space to accommodate a minimum of 30 stalls is required. A market would bring increased footfall to the area, benefiting local businesses who are already under threat from big supermarkets and online platforms. It would also provide a much-needed central meeting point for the community which currently is non-existent; and
5. The two bus stands by the storage containers work well as they are quite a distance from humans.

TfL is clearly in no in a hurry to review its London-wide borough bus provision and has come under heavy criticism for this; but continues to be seemingly indifferent to this. Therefore, options for where the two proposed bus stands could be established? Westminster. Until five years ago, bus stands for routes 452 and 28 were located on Harrow Road/Elgin Avenue.

Other suitable bus stand options are Westbourne Park or Sainsbury's interchange. Route 28 bus drivers actually change at Westbourne Park Bus Garage.

On **parking provision** – Pay and Display - that the Council:

1. Ensures that its residents and local business are adequately provided for and prioritised over non-residents.
2. Station Terrace area has its own dedicated CPZ as opposed to being part of CPZ KR, as it currently is.

KENSAL RISE RESIDENTS ASSOCIATION

JULY 2019