

Traffic Issue

Overall

The application fails to demonstrate that construction material and waste removal can be delivered safely, without increasing road danger, in a safe, efficient and environmentally friendly way. This application therefore needs to be rejected.

The application uses complex modelling VISSAM, CLP etc to summarise the impact of the construction phases and the development on local roads and junctions. These fail to resolve the problem of one access, only, in and out of the site and one delivery route during construction. The blame in the application for traffic impact is placed 100% on a "new and improved" junction at Canal Way/Ladbroke Grove and the need to increase safety (NB where there currently is no safety issue) for pedestrians and cyclists. The full impact of the construction traffic is not assessed.

The proposals are appallingly lacking in insight and safety in the designs for traffic impacts in the local area e.g. assuming canal path can accommodate additional pedestrians and cyclists, creating congestion to enable deliveries and cyclist/pedestrian access. It DOES NOT start by asking "How can this site work best to achieve the ideal plan for people to come and go and be on healthy streets"?

There is no doubt within the data summarised in the application that the construction deliveries will be a danger to health for residents and road users. The application hides this behind statistics.

As this proposal stands there are far too many unanswered questions about road safety, during and post construction, for the application to be acceptable. Far too many options are left open to future planning and arrangements e.g. with TfL. These issues need to be resolved before plans are approved to ensure an optimal infrastructure is in place and that capacity does not create or increase danger. This needs to be done before options are taken away by building works.

As residents of Warfield Road, we fear for our own safety at crossings, from pollution impacting us even within our own home, and noise in off peak times. Even now we rarely have easy access to our home due to tail back traffic on Harrow Road West; this will only make it worse.

In detail

The VISSAM model is based on assumptions which effectively negate the assessment of a +19% increase in HGV's. These are speed limit issues and safety issues at the Harrow Road/Ladbroke Grove/Kensal Rise junction, plus waste removal and a long-term adjustment i.e. it doesn't reflect construction deliveries for the next 10 years. Whilst it extends from Balby Road to the junction of Harrow Road/Kensal Road/Ladbroke Grove, it makes no assessment of the impact of traffic beyond the junction.

The focus on Canal Way and the proposals for junction changes and cyclist/pedestrian routes will increase road danger and endanger pedestrians. In addition, the proposals do not show sufficient consideration to the canal path, bridge access or separating out cycle/pedestrian traffic.

- The impact of construction traffic on the Harrow Road and the crossroad with Ladbroke Grove/Kilburn Road has largely been ignored. This is despite an access bridge being proposed onto the Harrow Road, an acknowledgement that this is a highly congested area, the clear proximity of this road to the Canal Way junction and guarantees to residents that this would be considered. V501 2.2.2 makes a reference to right turning traffic being given an extra 3 seconds...??? How does this calculate with current conditions? Please explain the meaning of 2.4 V503 2.4.2... any turning right is in conflict? The only safe option will be a right turn filter, but no assessment has been made for this.
- Assessments made (*VISSAM*) *incorporate* reduced data for the increase in HGV traffic +19% - this is below the danger level of 30% but no accurate data for the delivery period is made. The data provided in Chapter 7 Traffic and Transport doesn't add up...how can for example Harrow Road West (EB) traffic be higher (+18% or +19% HGVs) but Harrow Road West (WB) be much lower (+4%/+5%) this data requires better explanation – surely the trips are the same - the inbound/outbound traffic takes the same route?
- It assumes waste will be removed by Canal. This has not been confirmed. Data should be calculated with/without this included.
- Importantly no assessment has been made of the impact of the construction material deliveries on the Harrow Road Residents and the Crossroads – our document and videos of April 19th, 2023. This junction, as demonstrated, is a chaotic, dangerous free for all.
- Despite being assured by Westminster that a new safety report, for this junction, would be shared (due July 2023) this has not been done or provided. Westminster said our concerns would be reviewed in the context of this report. This has not been done. The impact of construction traffic cannot be fully assessed until the junction is proven to be safe and controlled. Currently it relies on users to navigate around the problems.
- Ballymore stated it would provide a summary of construction material deliveries, for residents, this has not been done (Michael Hughes). Data in the application is complex, contradictory, and deviously deceptive.

8.1.42 states “construction impacts have not been assessed in detail at this stage” Why not? How can any approvals be given without this? What guarantee to we have for our safety and health?

Figure 8-2 Construction vehicle profile shows from 2 from September 2026 to May 2029 there will be 400 – 600 vehicles a month i.e. 20 a day est. is this 800 – 1200 journeys? Figure 8-3 shows overlaps of subsequent phases (unclear) 1,452 trips daily...how can this be. We need this data better presented and explained.

- RBK&C assured residents that a safety assessment was being done by Ballymore. This has not materialised. (Sue Harris)

- The applicant states traffic on the Harrow Road delivery route is 30mph. This runs in the Harrow Road/Ladbroke Grove/Kensal Rise junction then turns to 20 mph on Ladbroke Grove. Residents are currently challenging the 30mph limit on Harrow Road West and at the junction. Specifically, the 20 to 30mph changes as traffic approaches the junction on Ladbroke Grove, Harrow Road West, and Kilburn Road.
- The deliveries are assumed to happen off peak however, the congestion on these roads is frequent and often unpredictable. No effort has been made to measure this or the impact. This is true on Balby Road which is also not fully included in the assessments.
- The focus of any traffic assessment has only been on the junction at Canal Way. This is the only access to the development. The application claims the "New and Improved" signalised access proposed for the junction will, as is required by the London Plan, improve safety for pedestrians and cyclists. Rather disingenuously the developer states this is "implementing a long-standing aspiration of RBKC".

The junction proposal fails to demonstrate any safety improvement. As it is, it will increase congestion and reduce safety. Ballymore have failed to look at this issue in terms of the impact on danger to nearby roads and pavements or with a true ambition to achieve successful reductions in traffic, congestion and therefore create better access for cyclists and for the increase in pedestrian numbers.

- There is no change to this junction which could be an improvement to pedestrian safety, other than to reduce traffic. The crossing at Canal Way is the easiest and safest crossing along Ladbroke Grove. You walk up to it, any traffic will be moving slowly and stop, you walk across. Many school children use it, and it is safe. Bus drivers are aware of it and stop. Ballymore have given no real consideration to the workings of the Junction, rather the PCL assessment 8.1.27 states "The results show the pedestrian crossing on Canal Way would perform poorly with unacceptable levels for pedestrians""it is proposed to review the pedestrian crossing facilities as part of the wider junction review to be undertaken with TfL and RBKC". This needs to be done prior to development approval or commencement. The design of the access is fundamental to the impact on local traffic of all kinds.
- It is not true to state "The modelling outputs presented in this TA indicate that improvements to dedicated cycle and pedestrian facilities within the junction will result in an increase in journey times when compared to the existing mini-roundabout junction. This is viewed as an appropriate trade off wholly consistent with RBKC, Mayoral and Government objectives to increase levels of active travel through delivering Healthy Streets Approach and reducing road danger." What this says in plain english is: "The traffic increases for this development at the Canal way junction will increase road danger. To try and adjust for this, the road traffic will be delayed and there will be more congestion i.e. and in turn this congestion will increase road danger, at the Balby Road junction, on Ladbroke Grove, at the Harrow Road/Ladbroke Grove/Kensal Road junction and by default on all the routes into and out of this junction. This in direct contradiction to the London Plan and Healthy Street Approach.
- The assessments (VISSAM, CPL) demonstrate the immediate roads leading into and out of this junction will suffer serious delays if the "new improved" signals are put at the Canal Way Junction.

- So, the development in construction and long term, will increase NOT reduce congestion as is required by the London plan. The public health effects of traffic during/from congestion are well known and associated with early deaths, diabetes, heart issues, stress.
- The only assessment of the access through to the Harrow Road junction is qualitative. This report glosses over the issue of heavy traffic, narrow and poorly marked cycle lanes, and a very narrow pedestrian pavement after the bridge and immediately before the lights. There are no proposals for changing the traffic on this stretch to incorporate wider pavements and cycle lanes or put-up protective railings.
- CLP 8.1.32 states “Some further advanced Cycle stages could be incorporated into the new junction design at the s278 stage of design. However, it should be noted that this could further impact bus journey times which are already impacted by the new junction.” Why for example isn’t the space created for plot 6 not being used for better access – a bigger roundabout, a subway access, separate lanes for cyclists?
- Longer term these traffic issues will not be resolved once construction stops. The application therefore fails to demonstrate a safe access to *pedestrians and cyclist in the surrounding area*. The PCL assessment only covers proposed footways on -site and the crossings at the proposed signal junction on Canal Way/Ladbroke Grove.
- The developer uses the whole site to justify the different levels of public transport infrastructure YET the only access into the site is in a high-level area. If the site is so big without additional access, then internal arrangements should be considered e.g. covered buggies on call as rickshaws or similar there were many options, yet nothing has been considered. It seems the only option are buses, but wouldn’t it be so much better not to have vehicles in the main development area. Where are the clever ideas?
- Proposals for pedestrian and cyclist bridges are not fully detailed or confirmed. These need to be worked into the plans far more carefully before they can be considered safe. For example: how will the access through the cemetery be designed – will this require a crossing/traffic lights and if so, will it have an impact on traffic congestion on Harrow Road? Is this the reference to a zebra crossing in the ATZ assessment? If so, how will it impact on traffic congestion?
- How will the increased number of pedestrians and cyclists’ impact on the Harrow Road junction? Where are the proposals to make this junction safe e.g. railings around the corners and the islands to protect pedestrians, reduced traffic flow into the junction, consistent 20 mph speed limits, right turn filters, better demarcation on the roads, speed controls, parking controls specifically outside the takeaway food outlets on Kilburn Road – and many more. Why is this junction being left until there are fatalities?
- There is no clear data for deliveries across the site in the long term as the population settles in and new retail outlets develop. How will this traffic be controlled?
- This is an “Inner London Opportunity Area” and should be car free except for disabled persons parking. The applicant has made no effort to reach a “no car” development and uses the proximity to Brent to justify large numbers of parking spaces. Sainsbury’s 227 + 15 Goods Online Vehicles, 345 parking spaces. Rather the removal of the PFS “which is a significant trip generator” is seen as an improvement to allow for replacing these trips rather than an opportunity to reduce trips. It’s not in keeping with the spirit of the London Plan or the Healthy Streets

initiative. It does not for example, include proposals to incorporate Club Car facilities for residents or Sainsbury's shoppers.

- The applicant has lacked clear forethought in how the proposals will impact on the safety of cyclists and pedestrians on the canal footpath. As any local will tell you, this is already an unpleasant experience. The footpath is narrow/standard in size and as a pedestrian it is uncomfortable. Bikes and electric scooters use this route, often fast, running up behind pedestrians. Cyclists assume precedent and there are no controls. As locals walking a dog, we cannot allow her off lead or enjoy the stroll as we must always be vigilant. Yet the developer blithely describes this route as a "cycle route on shared surface with pedestrians" (FaulknerBrowns Sept 23rd drawing 167-FAU001ZZZDR). If developed as per this application, the canal path will be barely usable by pedestrians. For example, it would seem common sense for the "canal authorities" to develop North/South routes for pedestrians or cyclists and not mix the two. Anything less will be a cheap, short-term fix, leaving yet more problems for the users and the future.
- Why is this developer not looking ahead and developing proposals to separate cyclists and pedestrians? It is unacceptable that proposals for such a large development do not put cyclists and pedestrians at the forefront of the plans.
- The minimum (20%) of EV chargers will be provided to the car park spaces. Why isn't the development classified as petrol and diesel free? Why aren't there any proposals for solar electricity generation. The proposal appears to be treating the transport traffic (all) as a hybrid as well as the overall proposal.