

Kensal Rise Residents Association **NW10**

December 2024

1. Decision

The Kensal Rise Residents Association (KRRRA) strongly objects to the proposed designs of the Queens Park Healthy Neighbourhood Scheme (QPHNS) project (Options A and B, October 2024) published by MP Smarter Travel. These options would impose selective road closures in the Queens Park area, limiting access for Kensal Rise residents at yet to be specified times whilst allowing Queens Park area residents unrestricted, penalty-free movement throughout the entire Queens Park ward, including Kensal Rise (See QPHNS project scope at [Annex F](#)), creating a two-tier ward. These wholesale restrictions would be unprecedented in the ward's history, imposing Penalty Charge Notices of up to £130 on Kensal Rise residents and other residents on the Avenue, Wrentham Avenue etc attempting to access parts of their own ward.

Whilst the KRRRA supports coordinated, evidence-based measures to reduce traffic volumes and congestion, improve air quality and road safety across London, Options A and B would create harmful consequences for safety, health and wellbeing throughout adjacent streets in the Queens Park Ward. This impact would particularly affect Chamberlayne Road, neighbouring roads further west into Kensal Rise, the Avenue, Wrentham Avenue, Salusbury Road and Harvist Road.

The significant focus on Chamberlayne Road throughout this response reflects its critical position in the ward's traffic network and its documented challenges: 40 collisions between January 2020 - December 2022, daily traffic exceeding 11,300 vehicles including over 1,100 twelve-ton buses, and NO2 levels nearly double the EU legal limit in some areas. The contrast between Chamberlayne Road's documented problems and the relatively low traffic volumes in the proposed QPHNS area underscores the misaligned priorities of the Council.

As a Victorian-era road never designed for such volumes, measuring just 6.5 meters in width, Chamberlayne Road exemplifies how the QPHNS proposals (Options A and B) would exacerbate existing traffic and safety issues in the Kensal Rise area, as traffic displaced by the proposed road closures would inevitably seek alternative routes through Chamberlayne Road and its surrounding residential streets.

Despite repeated requests to the Council and these well-documented issues, it is illogical - and many Kensal Rise residents find it insulting - that only a small section of Chamberlayne Road was belatedly included in the scheme's scope, merely to serve as a boundary marker for where the QPHNS would end, with no measures proposed to address either its chronic problems or the inevitable increase in traffic that would result from displacing vehicles from the closed roads in the Queens Park area.

2. Background and Context

The KRRRA fully endorses the principles of creating healthier and safer neighbourhoods. However, it is clear from the data that the traffic, air quality problems and very poor road conditions in the Queen's Park Ward are not caused by residents. According to Census 2021, 50% of households in Queens Park Ward have no car or van compared to the north of Brent where car ownership is higher with more than one per household.

The KRRRA would support a ward-wide scheme beginning with a clear problem statement, where any proposed measures addressing traffic volumes, road safety and air quality are grounded in data. Crucial to this would be comprehensive impact assessments informing decision-making.

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Unfortunately, this evidence-based approach appears to have been disregarded in formulating the QPHNS proposals, leaving the community to evaluate Options A and B based on a fundamentally flawed methodology. It is particularly concerning that the Council, supported by councillors, are content to spend up to £250,000, possibly more, of taxpayers' hard-earned money implementing a scheme in an area with minimal collisions, low traffic volumes, and air quality within legal limits.

The QPHNS study area itself demonstrates fundamental flaws in the Council's approach. Despite Chamberlayne Road's critical traffic issues, only a small section, minus any proposals / measures, was belatedly included in the study area, with the majority of Kensal Rise inexplicably excluded. The KRRA's repeated requests for clarification about potential measures for this limited section of Chamberlayne Road have received no meaningful response. Most concerning is the study's failure to analyse traffic flows across the entire ward or consider wider impacts on surrounding areas, underlining the piecemeal approach to what requires comprehensive solutions.

3. Evidence and Analysis

As the recognised and established resident association representing the Kensal Rise community, the KRRA's decision to object to the QPHNS proposals is founded on extensive consultation: a membership poll and comprehensive door-to-door conversations with residents and businesses in the Kensal Rise area.

A poll of its members conducted by the KRRA in December 2024 revealed that of those who responded, 92.8% opposed both Options A and B, with only 3.6% in favour and 3.6% undecided. Door-to-door engagement included conversations with over 200 residents, yielding overwhelming rejection of both options. Many residents, including non-KRRA members, confirmed their support for the One Neighbourhood petition, with 1,400 signatories, which opposes both Options A and B and calls for a comprehensive ward-wide study based on traffic data and flow patterns.

4. The Impact of Experimental Traffic Orders

The implementation of Experimental Traffic Orders (ETOs) to close several roads in "the Avenues" of the Queens Park area has severely impacted residents living on Chamberlayne Road. Traffic volumes have increased significantly along Chamberlayne Road and its side roads, especially Clifford Gardens, as vehicles seek alternative routes around the closed roads. Despite residents repeatedly raising these concerns with both the Council and local councillors, responses have consistently attributed the increased traffic to ongoing roadworks - an explanation that overlooks the fact that traffic displacement was evident before any roadworks began.

The Council's approach is particularly concerning as no baseline monitoring or impact assessments were conducted before implementing these closures. More worryingly, in seeking to retain these ETOs through extension (which we do not consider to be possible beyond the current 18 month period) or through a permanent traffic management order or other, the Council would necessarily need to proceed with closing remaining roads in the Queen's Park area, as Options A and B directly stem from traffic displacement to these roads following the initial ETO implementation.

With the ETOs due to lapse in April 2025, the Council has a clear opportunity to take a fresh, evidence-based approach by conducting a comprehensive Ward-wide study to properly understand and identify genuine traffic issues within the area.

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5. Misguided Proposals

The graph at [Annex A](#) (Total Number of Collisions on Chamberlayne Road between Jan 2020-Dec 2022) clearly demonstrates where traffic safety issues are most acute in the ward.

Chamberlayne Road, constructed in the late 1800s, is a 0.9 miles narrow single carriageway meandering through the predominantly residential Kensal Rise neighbourhood and has two schools on its borders. At an average width of 6.5 meters¹, it ranks among the narrowest roads in the Queen's Park Ward.

Initially designed for horses, carts, and Victorian-era 2ft x 4ft buses, Chamberlayne Road now faces the challenge of accommodating more than 1,100 largely oversized 12-ton double-decker buses servicing six routes weekly, along with approximately 90,000 vehicles, including cars, vans, HGVs, lorries, and coaches, each month.

The road presents stark statistics that demand attention:

- 40 collisions between January 2020 - December 2022, compared to minimal single-digit incidents on roads selected for the QPHNS
- Daily traffic exceeding 11,300 vehicles, including over 1,100 12-ton diesel buses
- In the Station Terrace area, air pollution, particularly Nitrogen Dioxide (NO₂), is nearly double the EU limit deemed fit for humans. While the EU and National Government legal NO₂ limit is 40 µg/m³, measurements in this area where hundreds of residents live, several children attending the Ballet School and residents and visitors patronising Tesco and the local cafes, show critical exceedance. In stark contrast, the QPHNS area maintains safe air quality levels, with NO₂ well below the illegal limit. See NO₂ graphic at [Annex B](#) with NO₂ readings across the Ward.

Chamberlayne Road is largely characterised by a mixture of solely residential properties, and three-story buildings with shops and restaurants located on the ground level, and residential apartments in the upper stories. About two-thirds of Chamberlayne is used solely for residential purposes with some on-street parking areas provided.

Despite its dense residential and school population, and several petitions from Kensal Rise residents asking for the traffic issues on Chamberlayne Road to be addressed, the last one of March 2024 securing over 250 signatures, rather concerning, the extract below from the Head of Healthy Streets and Parking report relating to the Avenues proposals suggests councillor support to concentrating traffic on roads like Chamberlayne while securing a leafier, safer and healthier environment for the Avenues (our emphasis):

"Following further discussions with ward councillors and officers' assessments of traffic surveys, it was agreed public consultation be carried out with residents and businesses of Dudley Road, Hopefield Avenue, Montrose Avenue and Summerfield Avenue to find their views on proposals to ban traffic except cycles entering these Avenues from Kingswood Avenue during 7-10am, Monday to Friday. The proposed scheme sought to prevent traffic from using these streets to avoid the Salusbury Road/ Harvist Road / Brondesbury Road signalised junction and encourage the use the main routes rather than the use of these residential streets". (Source: <https://haveyoursay.brent.gov.uk/en-GB/projects/hopefield-avenue-nw6-traffic-management-improvements>)

Brent Council along with the DfT classifies Chamberlayne and Salusbury Roads as Non Principal Classified Roads - designed to serve as local routes – such generally carrying

¹ Based on Google Maps measurements

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lower volumes of traffic than A or B roads. See graphic at [Annex C](#) showing Brent Council road classifications.

A short section of Chamberlayne Road - between Chamberlayne Road/Harrow Road junction up to Chamberlayne Road/Harvist Road junction - is designated as the B450. From this point up to All Souls/Sidmouth roundabout, Chamberlayne Road carries a C classification. C roads are specifically meant to connect local traffic to B roads. Therefore, the C section of Chamberlayne Road should be managed to connect local traffic to Harvist Road and the lower B450 section of Chamberlayne Road. The chronic unrestricted traffic witnessed on Chamberlayne Road indicates that the Council is failing to properly manage traffic through the 2/3rd C section of this road.

It is unclear why the Council classifies Harvist Road as the map at [Annex D](#) from Open Street Map shows it as the B 451. B roads are generally designed to handle heavier traffic than C roads, though not as much as A roads i.e motorways. This mismanagement of ward roads has resulted in large volumes of traffic being forced to travel on the C section of Chamberlayne Road. Hence, the traffic chaos witnessed daily.

In 2018, a study undertaken by Imperial College for Clean Air for Brent (CAfB) found that for Chamberlayne Road:

1. 64.3% of the Origin and Destination (O&D) journeys for through-traffic commenced and ended outside the borough.
2. 25.8% of vehicles started or ended their journey in Queen's Park Ward

Traffic count surveys also found that the average total number of motor vehicles travelling one-way along Chamberlayne Road per hour, during the peak travel periods, were substantially higher – two times higher - than traffic volumes witnessed on the typical UK road.

For the average evening peak hour traffic count, traffic volumes on Chamberlayne Road were almost three times higher than the morning peak periods. As the O&D survey results demonstrated, it was primarily through traffic passing along Chamberlayne Road.

It is highly unlikely that the above proportion of through traffic has decreased since 2018, more likely increased as DfT Road Statistic data shows that vehicles on England's roads increased following the Covid Pandemic in 2020.

In 2017, Ark Franklin Academy on Chamberlayne Road was identified as one of 50 schools on London's worst polluted roads in the Mayor of London's Air Quality Audit of Schools. The audit found that 75% of pupils do not travel by car to the school. See [Annex E](#) with graphic showing school travel data for Ark Franklin Academy. So, it is not the school run that is the cause of chronic volumes of traffic witnessed on Chamberlayne Road and its side roads. For the other school on Chamberlayne Road – Manor School – pupils are transported in a relatively small number of transit vans provided by Brent Council. Up to date information shows usage of the differing modes used by pupils remains the same. **School run data can be checked here:** <https://www.solvetheschoolrun.org/our-data>

6. The Kensal Corridor Scheme

The Kensal Corridor Scheme, while aesthetically pleasing, stands as a stark example of what happens when resident concerns are ignored in favour of superficial improvements. As with the Avenues and QPHNS projects, neither impact assessments or pre and post monitoring undertaken.

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Despite repeated warnings from the KRRRA and local residents about potential traffic issues, the scheme proceeded with narrowing Chamberlayne road, creating significant difficulties for vehicles, particularly buses, to pass each other.

The reduced road width has eliminated vital overtaking opportunities for say emergency vehicles, leading to increased congestion and higher pollution levels from idling vehicles. What was meant to be an improvement has made Chamberlayne Road less functional: bus services are now impractically slow due to congestion, cycling has become dangerous due to insufficient road space, and pedestrians must endure both increased pollution and shared pavement use with cyclists who have been forced off the road.

The scheme clearly demonstrates that without meaningful resident consultation and careful consideration of real-world traffic patterns, even well-intentioned improvements can result in worse conditions for those who actually live with and use these roads daily. This failure should serve as a cautionary tale for future projects, including the current QPHNS project.

7. Equity and Discrimination Concerns

A. Socio-Economic Impact: The QPHNS Options A and B lack impact assessment for surrounding areas. This oversight is not merely inequitable but potentially discriminatory. The Queens Park area represents the most affluent section not only of the ward but of Brent as a whole. This contrasts sharply with the area on the Kensal side of Chamberlayne Road, home to a more diverse population including many minority groups and those from lower socio-economic backgrounds. The proposals put forward by the Council do not show that due regard has been given to the equalities impacts of the QPHNS.

B. Impact on Vulnerable Communities: The impact on the Kensal Rise area, specifically along Chamberlayne Road and its side roads such as Clifford Gardens, and the many schoolchildren who must navigate this increasingly hazardous environment daily appears to have been entirely overlooked in the Council's planning.

8. Process and Accountability Issues

A. Lack of Transparency: Despite numerous requests, including Freedom of Information requests to the Council, the rationale behind selecting roads in the Queens Park area for the scheme remains unclear. Several follow up emails regarding the Avenues and the QPHNS road closure proposals were sent to the Council requesting information, with unsatisfactory or no responses received, necessitating escalation to the Information Commissioner's Office (ICO) complaints process.

B. Consultant Accountability: The practice of deflecting blame onto consultants, as is being witnessed with the QPHNS proposals produced by MP Smarter Travel (MPST), mirrors the Council's approach during the Kensal Corridor scheme. In both instances, when faced with criticism about flawed designs, the Council did not attempt to put the record straight, leaving many residents to conclude that it was the consultants who were responsible for the shortcomings.

However, this conveniently overlooks standard practice where transport schemes are commissioned by the sponsor - in this case Brent Council - who specifies the brief and tender requirements. It is Brent Highways Officers, supported by councillors, who discuss and determine the goals, objectives and scope to which consultants must respond.

C. Pattern of Behaviour: In the Kensal Corridor scheme, as now with the QPHNS, vital data on traffic movements and air quality were disregarded in the initial brief, leading to

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fundamentally flawed proposals. When these flaws became apparent, consultants were put 'out to dry' rather than the Council acknowledging its own role in setting an inadequate brief.

This pattern of behaviour undermines trust in the Council's ability to manage major / ward infrastructure projects and raises serious questions about accountability in decision-making processes.

D. Inadequate Evidence Base: The QPHNS rests on fundamentally flawed data and analysis. Most notably, it fails to include current traffic counts for Chamberlayne Road, presents no modelling of traffic displacement impacts, and relies on outdated traffic counts from November 2023 - before the Avenues restrictions were implemented. This reliance on pre-restriction data makes any analysis of current traffic patterns inherently unreliable.

The report's contradictions are particularly striking: while acknowledging Chamberlayne Road's very poor healthy street score, it proposes no measures to address these documented problems. Instead, it inexplicably prioritises interventions for streets that already maintain good healthy street scores, offering no justification for this counterintuitive approach.

9. Conclusion

The QPHNS proposals represent a fundamentally flawed approach to neighbourhood traffic management that ignores clear evidence and threatens to create a dangerous and discriminatory precedent in the Queen's Park Ward. The data decisively shows that the ward's traffic problems stem primarily from non-resident through-traffic, with Census 2021 revealing that 50% of Queen's Park Ward households don't even own cars.

The evidence against these proposals is overwhelming:

- Chamberlayne Road, a Victorian street never designed for modern traffic volumes, suffers 40 recorded collisions and over 11,300 vehicles daily, including 1,100 diesel buses
- 64.3% of through-traffic journeys neither start nor end in Brent
- Air pollution in the Station Terrace area is nearly double the EU and National Government safety limit
- The school run is not the cause of Chamberlayne Road's chronic traffic issues as 75% of pupils do not travel by car

The Council's fundamental failure to manage traffic according to road classifications is particularly concerning. The C-classified section of Chamberlayne Road, intended only for local traffic connecting to B roads, has become an unrestricted thoroughfare. This mismanagement has been compounded by the implementation of ETOs in 'the Avenues,' which has further increased traffic without prior impact assessment or baseline monitoring.

The Council's approach has been characterised by:

- Disregard for evidence-based decision making
- Failure to conduct proper impact assessments
- Lack of transparency in selection criteria
- Dismissal of legitimate concerns from affected communities
- Repetition of past mistakes seen in the Kensal Corridor scheme
- Inadequate response to Freedom of Information requests

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The resulting proposals would create an unprecedented two-tier ward where:

- Queen's Park area residents enjoy unrestricted movement throughout the entire ward
- Kensal Rise residents face financial penalties of £130 for accessing parts of their own ward
- Existing traffic and air pollution problems on Chamberlayne Road would be severely exacerbated
- Already vulnerable communities would bear the burden of increased pollution and safety risks
- The socio-economic divide within the ward would be further entrenched

The overwhelming community opposition - evidenced by approximately 93% rejection in KRRA's poll and 1,400 petition signatures gathered in just four weeks - demonstrates the depth of concern about these proposals. The scheme not only fails to address the root cause of through-traffic but actively worsens conditions for many ward residents.

With the ETOs due to lapse in April, there is a clear opportunity to pause, reassess, and conduct the comprehensive ward-wide study that should have been done initially. The Council's £250,000 investment would be better directed toward evidence-based solutions that benefit all ward residents equally, rather than creating privileged zones that exacerbate existing inequalities. Without substantial reconsideration and a genuine ward-wide approach, these proposals risk creating lasting damage to both community cohesion and public health.

7. Recommendations

The KRRA urges the Council and Councillors to:

1. Undertake substantial reconsideration of the QPHNS proposals
2. Develop specific mitigation measures for Chamberlayne Road, acknowledging its existing high usage and physical constraints
3. Allow the ETOs for the Avenues to lapse in April 2025 – do not make permanent or attempt to extend the duration
4. Commission a ward-wide traffic study to inform a comprehensive, equitable solution
5. Prioritise areas with documented safety and air quality issues
6. Ensure the fair distribution of both transport benefits and burdens across the entire ward. Public transport provision, particularly bus services which offer an affordable alternative to both cars and underground travel, should be equitably spread. This aligns with the council's sustainability goals by encouraging mode-shift away from cars. The current approach of concentrating traffic problems and bus routes in certain areas while creating protected enclaves in others undermines both fairness and environmental objectives
7. Engage with all community groups equally in future planning processes
8. Consider borough-wide approaches to managing non-resident through traffic

Chamberlayne Road and Kensal Rise residents must have equal consideration in ward improvement decisions. While traffic and air quality issues need addressing, the focus should be on reducing overall traffic volume rather than displacing traffic to already over-capacity roads such as Chamberlayne. A holistic approach is needed, examining ward-wide traffic levels and implementing measures where needs are greatest, rather than favouring areas with well-organised residents' associations / residents skilled in council engagement.

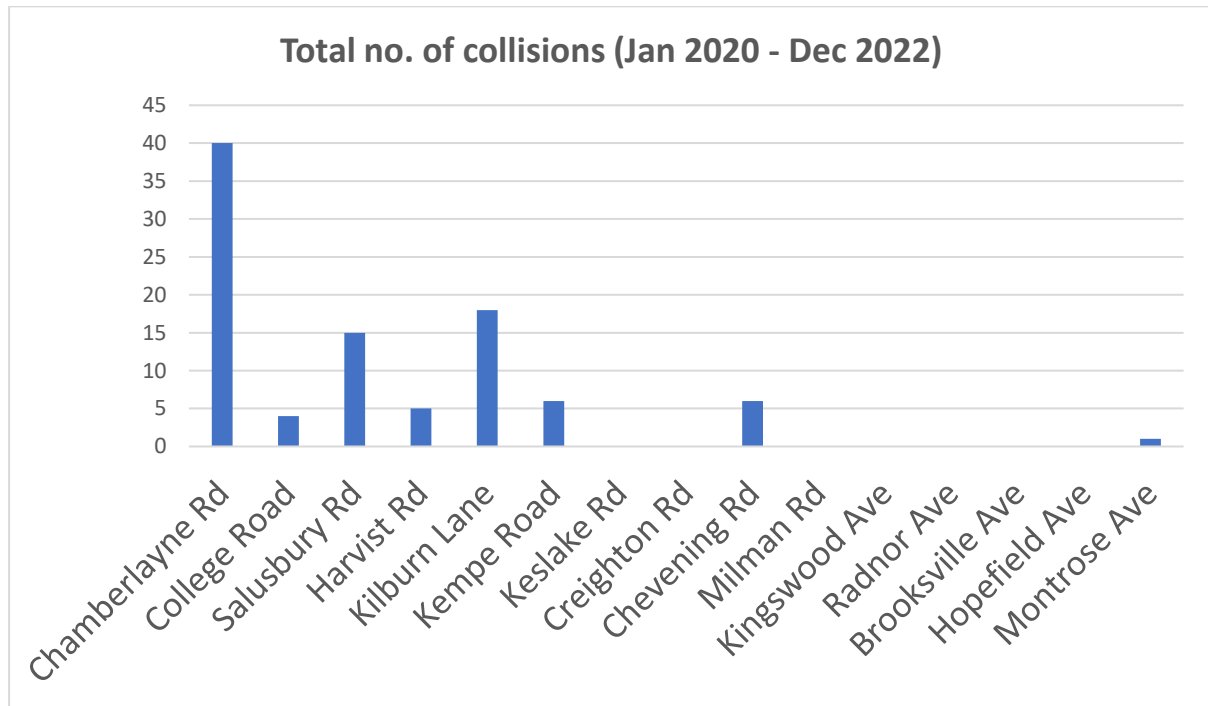
THE KENSAL RISE RESIDENTS ASSOCIATION

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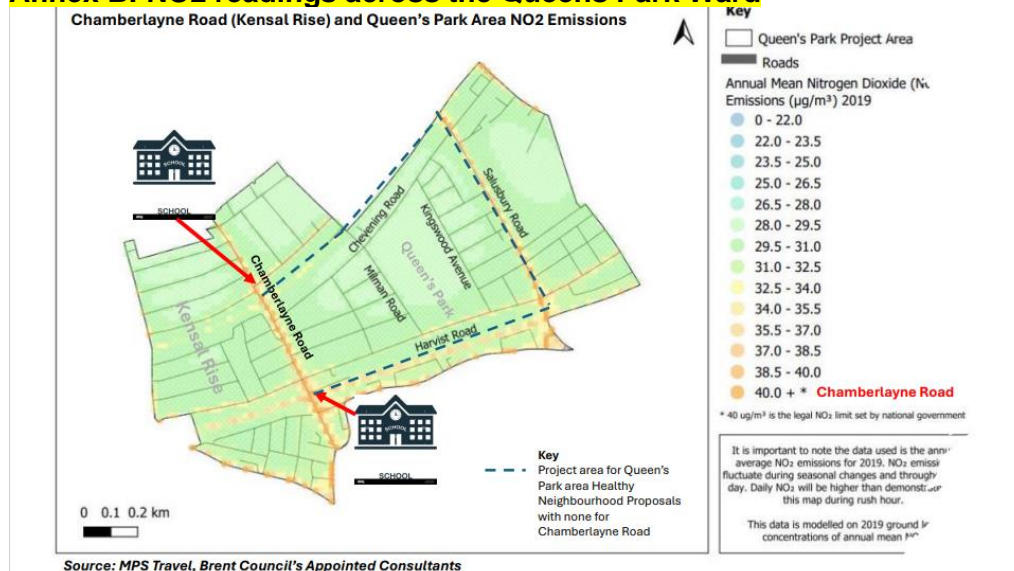
Annex A: Total Number of Collisions on Chamberlayne Road between Jan 2020-Dec 2022



Source: GLA Data Extract

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Annex B: NO₂ readings across the Queens Park Ward

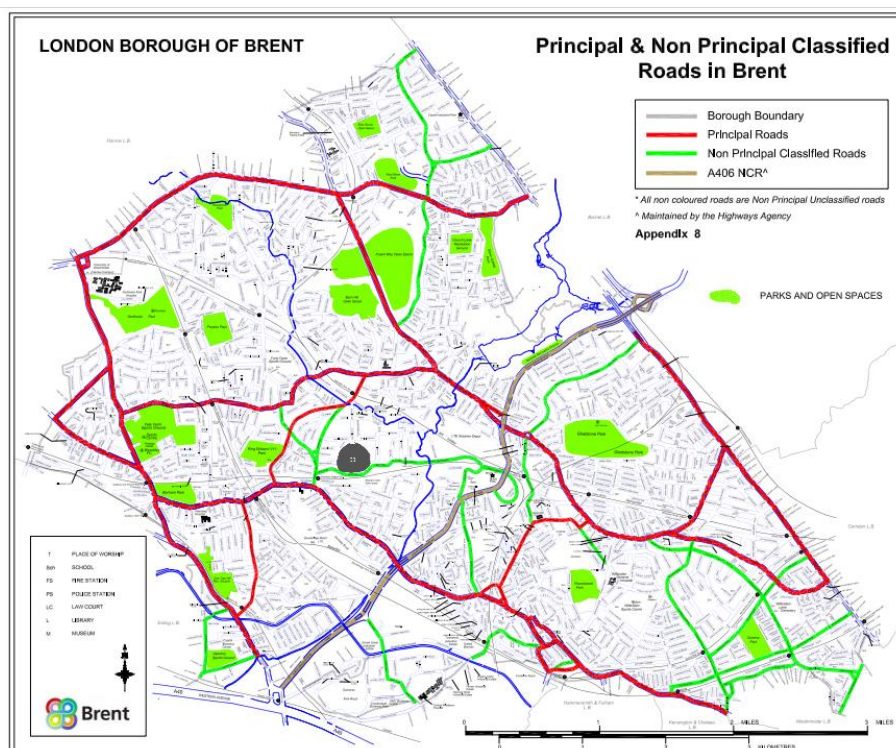


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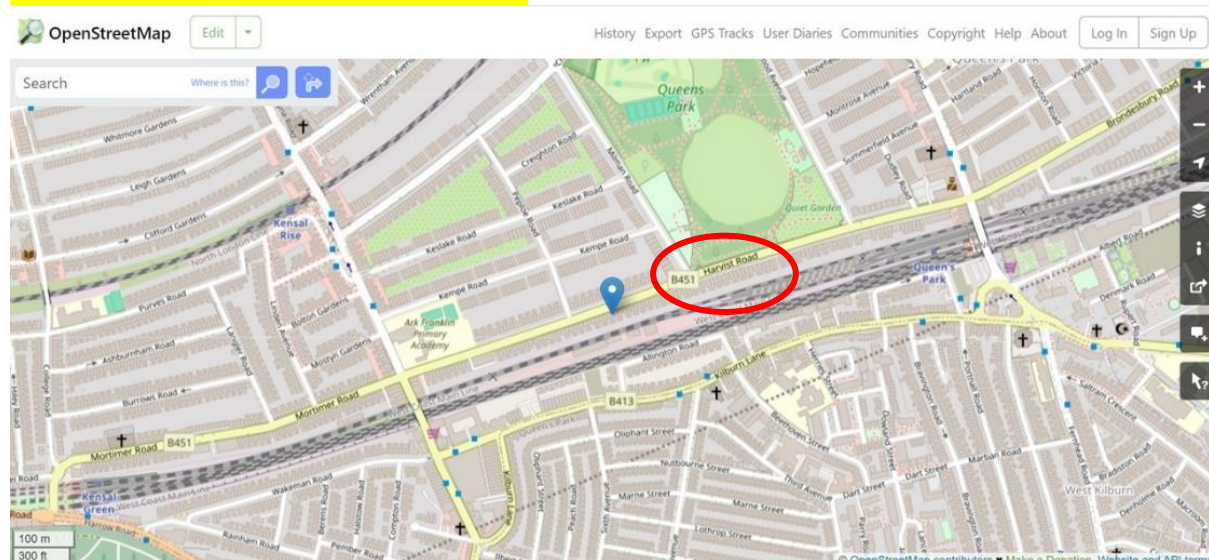
Annex C: Brent Council road classifications



Source: Brent Council

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Annex D: Harvist Road Classification



Source: Open Street Map (<https://www.openstreetmap.org/>)

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Annex E: School travel data for Ark Franklin Academy

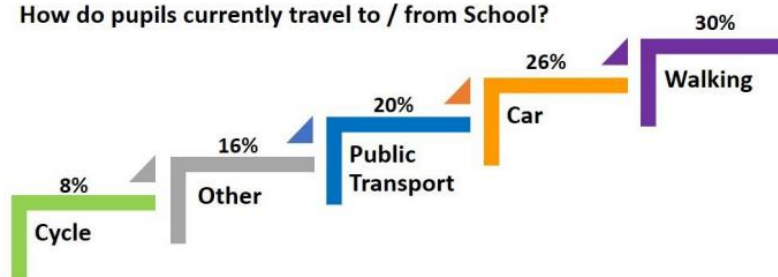
Borough: Brent

Address: Harvist Rd, NW6 6HJ

Pupil Numbers: Approximately 650



How do pupils currently travel to / from School?



Source: The Mayor of London's Air Quality Audit for Schools,
https://www.london.gov.uk/sites/default/files/saq_report_-_ark_franklin_brent_-_inc._appendices_v1.1.pdf

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Annex F: Queens Park Healthy Neighbourhood Project Scope (Area within purple boundary)



Source: Queens Park Area Healthy Neighbourhood Study

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