Kensal Rise Residents Association NW10

18 September 2025

Formal Objection to Planning Application Ref: PP/25/03535 (Kensal Gasworks Redevelopment by St William Homes LLP)

1. Decision

KRRA objects in the strongest terms. The application represents overdevelopment in a location with fundamentally inadequate transport infrastructure. On transport grounds alone the scheme is unacceptable; further harms arise in relation to air quality, health, heritage, townscape, and social infrastructure.

2. Background and Context

The hybrid application seeks up to 891 homes in six buildings (11–31 storeys) with commercial floorspace, new access, and a decade of remediation and construction on the former Kensal Gasworks site adjoining Sainsbury's at Ladbroke Grove. St William is the sole applicant. Neighbouring Ballymore/Sainsbury's proposals are separate and outside the applicant's control.

3. Transport and Highways – Fundamental Failings

3.1 Existing Conditions and Capacity Constraints

- The site sits on the edge of Kensal Rise/Queens Park with direct egress to Ladbroke Grove, which feeds immediately into Chamberlayne Road and Harrow Road. These corridors are already saturated and operate with extensive queuing and low peak speeds.
- Chamberlayne Road (C-class, narrow single carriageway) carries circa 11,000 vehicles per day and approximately 7,000 weekly bus movements (predominantly 14-tonne double-deckers). Between 2020 and 2022 there were 40 recorded collisions on this 0.9-mile length. This is already an unsafe corridor for pedestrians and cyclists.
- Roadside nitrogen dioxide on the network is known to breach the 40 µg/m³ annual mean objective (e.g., at Ladbroke Grove/Harrow Road).

3.2 "Car-Free" Claim vs Real-World Traffic

- The scheme is described as 'car-free' but provides 79 Blue Badge spaces and on-site servicing bays. Even without general resident parking, significant vehicle activity remains: construction HGVs, servicing and delivery vans (including e-commerce and groceries), refuse collection, emergency access, ride-hail/taxis, tradespeople, carers and visitors.
- The Transport Assessment relies on an assumed 87% sustainable mode share and as few as 8–11 peak-hour car trips, but omits or under-represents the categories above.

Kerbside pick-up/drop-off (PUDO) and displaced parking search traffic will increase idling and conflict at junctions and crossings.

3.3 Bus Reliability and Network Performance

- While multiple routes pass the Sainsbury's/Ladbroke Grove area, they are already delayed by congestion. The development adds boardings without bus priority, lengthening dwell times and degrading reliability for existing users.
- No enforceable bus-priority measures or signal priority are proposed to offset added load at pinch-points; there is no quantified evidence of neutral or beneficial impact on journey times.

3.4 Pedestrian, Cycle and Junction Works (Ladbroke Grove / Canal Way)

- The applicant refers to new pedestrian/cycle routes, lighting and landscaping, and Canal Way junction works (including a potential bus stop/turnaround). KRRA supports genuine active travel improvements, but the submission lacks key technical details: cycleway widths, gradients, crossing types and phases, visibility splays, and pedestrian/cycle Level of Service.
- Delivery of the works is conditional and scenario-dependent. If neighbouring access is delayed or altered, the development may rely on an under-spec Canal Way access for years, funnelling movements into a constrained junction.
- There is no published, auditable modelling demonstrating reduced queues/delays, improved bus performance, or safer pedestrian crossing times.

3.5 Junction Modelling and Evidence Gap

- No Transport Assessment appendices are publicly available showing turning counts, AADT/AADF inputs, LINSIG/VISSIM outputs, queue lengths, average/maximum delays, or degree-of-saturation (RFC/DoS). Without this, claimed benefits of the Ladbroke Grove/Canal Way works are not independently verifiable.
- No sensitivity testing is published for a 'Standalone Scenario' with higher servicing/delivery and ride-hail volumes, nor cumulative impacts with nearby schemes.
- KRRA requests publication of all modelling appendices and re-consultation before determination.

3.6 Servicing, Deliveries and Kerbside Management

- High-density residential generates high van activity. The Delivery & Servicing Plan lacks enforceable caps, consolidation, or time-window management to prevent peak-time conflicts at Ladbroke Grove and Chamberlayne Road.
- Kerbspace on surrounding streets is already scarce. Without secured off-street loading management and marshalling, kerbside PUDO will block cycle desire lines, bus stops and crossings, worsening safety and delay.

3.7 10-Year Construction and Remediation Impacts

- A decade of works implies sustained HGV routing, abnormal loads, crane operations, temporary traffic management, lane closures and footway diversions. Construction Traffic Management Plans (CTMP) and Construction Logistics Plans (CLP) are not provided at a level sufficient to assess peak HGV profiles, holding areas, routing to/from the A404, or cumulative overlap with other local sites.
- Non-Road Mobile Machinery (NRMM) and stop-start HGVs will increase NOx/PM, directly conflicting with air-quality objectives and Healthy Streets outcomes.

3.8 Air Quality and Legal Compliance

- The area already records exceedances of the NO_2 annual mean objective. Added congestion/queuing from development-generated traffic and construction activity will worsen exposure for residents, including children and vulnerable people, contrary to London Plan SI1.

3.9 Road Safety and Vision Zero

- Chamberlayne Road's 40 collisions (2020–2022) on 0.9 miles is unacceptable. Additional PUDO, van activity and HGV movements will raise conflict risk at side roads, bus stops and cycle crossings. Road Safety Audits (Stages 1/2) for the junction and internal network are not published; design fails to demonstrate meaningful casualty reduction in line with Vision Zero.

3.10 Cumulative Impacts and Dependency Risk

- The transport case leans on a wider masterplan and third-party access that are not in the applicant's gift. Phasing triggers, Grampian conditions, and safeguarded funding are not secured. RBKC risks approving a high-trip generator with uncertain mitigation.

3.11 Specific Harm to Chamberlayne Road (Queens Park Ward)

- Because Ladbroke Grove feeds directly into Chamberlayne Road, any increase in site-related traffic (servicing, ride-hail, visitors and construction) will spill into a corridor already operating beyond safe capacity. The proposal will intensify congestion, noise, vibration and pollution for residents and businesses along this key link and worsen bus reliability.

4. Overdevelopment: Height, Scale and Density

Six buildings up to 31 storeys in a 4–6 storey context represent incongruous massing and excessive density (>600 dph). This is contrary to London Plan D9 (Tall Buildings) and RBKC CL1/CL2.

5. Lack of Supporting Social Infrastructure

Approximately 2,200–2,400 residents would require additional school places, primary healthcare capacity, and accessible public open space. No commensurate provision or secured funding is demonstrated (London Plan S1/S2; RBKC CK1).

6. Environment and Health

A 10-year build on a contaminated site presents material health risks (dust, hydrocarbons, asbestos). Carbon proposals fall short of clear net-zero pathways (London Plan SI2).

7. Heritage and Townscape

The height and mass would dominate the canal corridor and harm the setting of Kensal Green Cemetery (Grade I registered). Public benefits do not outweigh the identified harm.

8. Conclusion and Recommendation

On transport grounds the proposal is unacceptable: existing capacity is exceeded; claimed mitigations are uncertain and unevidenced; construction and servicing impacts are under-assessed; and Chamberlayne Road would be materially worsened. These failings, together with overdevelopment, missing social infrastructure, and environmental and heritage harms, require refusal.

KRRA requests refusal. If the Council is nevertheless minded to approve, it must first: publish full TA appendices and re-consult; secure binding bus-priority and active-travel specifications; impose robust CTMP/CLP controls and HGV caps; require cycle designs compliant with LTN 1/20; and tie occupation to delivery of assured, funded access upgrades via enforceable conditions and S106/S278 agreements.

KENSAL RISE RESIDENTS ASSOCIATION