

- The application material has failed to adequately assess the full impact of the proposals in highways, noise and air quality terms;
- There are numerous errors and omissions in the technical reports which cast doubt on the conclusions reached;
- The proposals will give rise to a dramatic rise in traffic numbers through South End;
- This increase will result in an unacceptably detrimental impact on the amenity of existing residential properties – in terms of noise, air quality and general disturbance;
- Given the extremely narrow carriageway widths in South End, the proposals will give rise to serious ongoing highway safety risks;
- These impacts will cause harm to the core character of the Kensington Square Conservation Area in this location; and
- As a result, the proposals have failed to adequately address the specific risks identified in the Heythrop College SPD.

Our client does not object to the redevelopment of the Heythrop College site in principle, but only the traffic (and consequential) impacts of the proposals.

She is extremely concerned by the proposed vehicular access proposals. She requests that the Applications be refused by the Council for the reasons set out below or withdrawn by the applicant in order for proper efforts to be made to accommodate other more imaginative alternative vehicular access arrangements either over or under the railway line both during construction and in the operational phase of the development.

If the applicant is unable to provide alternative acceptable vehicular access arrangements, then the development of the site as proposed by the Applications should not be approved.

## **2. Existing Character of South End**

South End is a typically narrow cobbled predominantly residential mews. It narrows from 4.6m to 4.30m width at the existing entrance to Heythrop College.

Four of the six house (numbers 15-18) on the north side of South End egress directly on to the street – there is no pavement or barrier between the houses and the carriageway. These four houses possess five garages that also face directly on to South End.

By way of illustration we enclose at Appendix 1 a series of photographs taken at 1.30pm on Friday 26 October 2018. It can be seen that one van (visiting an existing property in South End) completely blocks the west end of the street. The photographs illustrate the existing constrained situation at South End and demonstrate that the scale of additional traffic contemplated by the Applications will give rise to wholly unacceptable highways safety issues and congestion.

South End forms part of a network of equally narrow streets, including St Alban's Grove and Victoria Road (which is narrowed by its own parking arrangements), to the south and west of Kensington Square. It falls within the Kensington Square Conservation Area.

In his evidence to the public inquiry in respect of our client's planning appeals in December 2016, the Council's Highways witness (Mr William Howe) stated that:

*"The presence of parking bays on South End itself and the majority of surrounding streets means the carriageway widths are restricted further still.....It can be seen.... that clear carriageway widths are typically between 3.5m to 4m".*