

Executive Director
Planning and Borough Development
Kensington Town Hall
Hornton Street
W8 7NX



5 October 2018

Dear Sir,

PP/18/05313: Heythrop College, Kensington Square, London W8 5HH

We write to object to the proposed Heythrop development for the following reasons:

1. It is difficult to anticipate there will be demand for the 142 extra care units **priced at an average £2650 psf** (assuming the average size of 1200ft², this translates to £3.2 million for a flat).
2. Furthermore, the **comparables used by Knight Frank** are, firstly, **all for a different class of housing (i.e. not extra care)**. Secondly, you will note that **none of the comparables have been 100% sold**. Thirdly, all of them are **much smaller developments than the proposed Heythrop development**.
3. In fact, for One Kensington Gardens, W8, which is probably the closest in proximity, completed two years ago, and still has 50% unsold units. Knight Frank has also made a further note that, *"in light of the restricted market"*, they would consider it optimistic that *"the remainder [90%] of the units could be sold within a 24 month period"*. This should already provide **an indication that the lukewarm demand** for very high-end flats do not support the viability of Heythrop as a large scale, highly priced, extra-care residential development.
4. The size of a 150-unit development is still too large and dense for the area, and adding does not accord with the quiet neighbourhoods on the east and north sides. Based on the minimum and maximum occupancy of 1-2 persons for 1-beds; 2-4 persons for 2-beds & the duplex, and 5-10 persons for the 5-bed dwellings, this translates to an increment of **c250-500 residents**. This is equivalent to building a large hotel but with restricted access through a narrow road not easily accessible from the main roads.
5. There is no doubt that such a significant uplift in residents is already much higher than its current use as a college. Also, even in spite of the majority being extra care units, by virtue of the high resident numbers, this would nevertheless create a **significant knock-on impact of the local traffic levels**.
6. The developers may argue that extra-care units warrant less use of vehicles but this is tenuous. With the higher medical/health requirements and often reduced mobility of the anticipated residents, there will be a **greater need for transportation for residents** to get around and/or receive visitors, e.g. taxis for hospital or physio visits, grocery deliveries, etc. This is **further exacerbated by the proposed scrapping of the onsite GP** from the previous plan.

7. The onsite GP was a good proposal that would have benefited both the extra-care residents and also the public. Instead, its **proposed removal is divergent to the main purpose** of the development (extra-care); **diminishes the public amenities** to a less useful landscape garden area (we already have Hyde Park on our doorstep?), and puts further pressure on residents to be required to travel out of the site for their regular health visits.
8. **Issue of single vehicular access point** - South End, as the only vehicular access point is **far too narrow and restricted to support** some 250-500 new residents. This is the same for some of the neighbouring roads which traffic would have to come through to reach South End (from Kensington Court, Victoria Road through to St Albans, Kensington Court Place, etc).
9. The substantive increase in traffic to support this dense development of flats will **substantially raise both noise and air pollution levels** (especially around Ansdell Street, Kensington Court Place, Kensington Court, Thackeray Street and South End).
10. The proposal for the landscaped public space will also **encourage even higher levels of foot traffic**, and cause those residing in the properties in the neighbourhood to **suffer from increased pedestrian noise**. In particular, those on South End, Ansdell Street, Kensington Court Place, Thackeray Street, Kensington Square will be directly impacted, where noise levels already tend to be 'magnified' due to the narrow streets, taller mansion houses and lack of greenery to dampen sound (e.g. we already have had the occasional loud pedestrian noise from people walking from Richmond College and the Builders Arms to the high street).
11. With the increase in both vehicular and foot traffic, the impact of such a development will **destroy the otherwise tranquil nature** of the Kensington Court and Victoria Road neighbourhoods, as most of the foot and vehicular traffic will need to pass directly through this area to get to South End.
12. Surely the increase in traffic as a result of this development entering from Kensington Road via Kensington Court and Victoria Road will also be in **direct conflict with** the council's **designated "quietway"** provided on the Kensington Court – Kensington Court Place – St Albans Grove route.
13. The deck over the railway lines is an innovative idea; however the proposal has not gone far enough and lacks any convincing work done by the developer to extend this proposal to explore **an alternative vehicular access point from Wrights Lane**. If plans can be drawn up to support a deck over the train lines, surely it would be equally feasible to construct a ramp (e.g. similar to those used in shopping centres) to facilitate vehicular entry from Wrights Lane across the train tracks instead? Creating **an entry point from Wrights Lane will in fact be much closer to the High Street Kensington tube station** than even the pedestrian access from Kensington Square.
14. More work could be put into developing the 'step free' access to the tube station study. Those areas that are not owned by LUL or Heythrop could be looked into further and the relevant stakeholders sought to have all other options properly considered.
15. The **proposed route for construction traffic has not changed and for it to last till 2023, remains unacceptable**. Even between the hours of 9am-3pm outside of the school runs, there are many pedestrians along those residential roads. The roads are narrow and with off-street parking, cars will be prone to damage from passing heavy traffic and we will likely to lose many of the parking spaces (which are already in short supply in the immediate neighbourhood) to long-term suspensions over a 5-year construction period.

16. As residents in the area, we will **be subject to a far too prolonged period of noise and air pollution levels, and much inconvenience** through what will be traffic delays and suspensions. Currently plans show construction completing in 2023, although that's not to say there won't be the inevitable building delays which could drag this out much further.
17. The previous construction work on the **Young Street and Victoria Road developments bear testament to the disruption and inconvenience** we have had to endure **over the last 5 years**. Heythrop is a much bigger project and will be far more disruptive and poses a greater risk to the comings and goings of the local community in this neighbourhood.
18. We have two children who walk along St Albans Grove and Kensington Court Place on a regular basis and not just during the school runs. I believe the construction period and route **creates a real risk to their safety**, as well as for those school children in Thomas's who walk between the school buildings on St Albans and the park even during 9am-3pm.

In summary, we believe this proposal is not viable for the key reasons:

- **The proposal for a significant number of expensive, extra care units does not appear to be one which will result in full occupancy. Perhaps the use of the site would be better suited to remain as an educational one.**
- **Current single vehicular access point for 250-500 new residents through a quiet residential neighbourhood is not viable.**
- **South End should be a secondary access point and a primary access point via Wrights Lane over the new deck should be developed instead.**
- **Having the only traffic access route through a quiet and tranquil neighbourhood will create a long-term significant impact on noise and air quality levels (CO7) which is detrimental to the wellbeing of residents (CO2).**
- **The tranquillity of the residential neighbourhoods surrounding the site will be destroyed by the influx of people, visitors and traffic from such a large scale residential development.**
- **Limited communal benefits of the proposal that do not outweigh the long-term consequences and damage to the surrounding residential neighbourhood.**
- **The proposed construction period and route is not appropriate and will impact the safety and wellbeing of residents and the local community for an extended period of time. The developer should look to spread some of the load of construction traffic across other access points (Kensington Square and Wrights Lane).**

We hope you consider the serious implications of this development on the residents in the immediate neighbourhood and urge you to refuse the application.

Yours faithfully,

