

David Warman
Richard Max & Co.
87 Chancery Lane
London
WC2A 1ET

31st October 2018

Dear David,

Heythrop College, 23-24 Kensington Square, London, W8 5HH
Application Reference Number PP/18/05313

- 1 Further to your instructions in relation to our mutual client's residential premises at South End, Kensington, I write to advise on my consideration of the potential effects of noise generated by the proposed development. In doing so, I have considered the Noise and Vibration Report of 24th August 2018 (Sandy Brown Acoustics) and the contents, where relevant, of the Transport Assessment, also 24th August 2018 (Arup).
- 2 The properties in South End are directly adjacent to the application premises, and front on to what is, and will remain the principal vehicular access to the site. The South End properties would be among the nearest receptors to noise from the proposed development, particularly in relation to traffic noise from vehicles using South End.
- 3 The noise assessment contains results from a noise survey undertaken in October 2017. Whilst not actually on South End, measurement position C appears to be in close proximity and is deemed to be representative of the noise climate at South End. The results show ambient levels of, typically, 50 dB LAeq,T during the day and 45 dB LAeq,T at night, with background sound levels of, typically, 40 dB LA90,T during the day and 35 dB LA90,T at night. It should be noted at this juncture that these are relatively low levels when considering this urban location in London, indicating that the existing noise climate is not particularly high, and certainly lower than one typically might expect in London.
- 4 The noise assessment report addresses the following noise (and vibration) subjects:
 - Internal sound levels for future occupiers of the proposed buildings
 - Noise egress from future mechanical services plant, and appropriate noise limits

- Vibration and re-radiated noise in relation to rail generated vibration, affecting future occupiers of the proposed buildings
 - The effects of the scheme massing (including the proposed deck over the railway) on future noise levels
- 5 However, there is no analysis of any other noise impacts from the development and, critically, the assessment does not include any assessment of noise from the construction phase, nor does it include assessment of noise from traffic using South End – the principal vehicular access to the site.
- 6 South End is, currently, a quiet mews. At the western end is a gate forming the vehicular access to the Heythrop College site. The Transport Assessment sets out that, in 2017, traffic surveys were undertaken, but does not report the results because the College, was, at that time, largely vacant. Instead the transport assessment uses figures predicted from the TRICS database to form a view of “likely” traffic flows to the site, in its use as a college.
- 7 This approach, of course, fails to recognise that the noise climate to which residents of South End are currently exposed and have become accustomed is that generated by the fact that the College is largely vacant, not some potential past or future college use. Any impacts, therefore, would be felt from a current baseline as it exists, not an artificial baseline produced from the TRICS database.
- 8 The reality is, that the development will generate a traffic flow on South End of some 111 trips per day, with an additional 34 service vehicle trips. There will, in addition, be refuse collections, a daily food waste collection and clinical waste collections by specialist contractors. During the construction phase, it is anticipated that there will be an average of 20 construction vehicles using South End on a daily basis. All of these vehicles will pass in very close proximity to the dwellings on South End, which is a narrow street with little set-back between the properties and the carriageway.
- 9 Whilst these figures may seem low in any other context, it must be set into an analysis of, effectively, a cul-de-sac mews upon which there are no more than 10 residential properties and very few traffic movements (and especially not by larger vehicles), in what has been shown by the noise surveys to be a relatively quiet part of London.
- 10 There is a real risk of significant adverse impacts from traffic noise, both during construction and operation, on the residents of South End. This has not been addressed adequately by the application documentation and the noise assessment does not include any analysis of traffic noise impacts. I am of the view that the Council cannot properly determine the application without such an assessment being undertaken in sufficient detail.

I would be happy to discuss the above further.

Yours sincerely,



Partner