

**From:** Gavin McLaughlin

**Sent:** 09 December 2024 22:06

**To:** Planning

**Subject:** Re: 2024/1145/P 14 Blackburn Road London NW6 1RZ - TfL comments

Hi Josh

Sorry for the delay in responding fully for TfL Spatial Planning on this application. We have the following comments:

- All comments we previously made from TfL Spatial Planning on application ref no. 2023/1292/P remain relevant, and we re-submit them in response to this consultation. Please confirm by return email they will be re-tabled and formally considered.
- I note your separate discussions with my colleagues in London Underground (LU) regarding the station upgrade project and Infrastructure Protection (IP) matters. Please continue to consider their input formally in the planning process.
- As we commented separately on the 2023/1292/P application, the car parking proposed to serve residential land use at the site is not London Plan compliant. This fundamentally fails to comply with London Plan policy T6 Car parking in full, and particularly part L which states "Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy."
- Relatedly, despite the Certificate of Lawfulness awarded due to some form of commencement of construction for the historic permission, it is not accurate as the Transport Statement submitted for this application argues that the existing permission has been 'implemented' and represents baseline conditions and transport activities at the site. For the purposes of impact assessment, current site operations should be the baseline above which net additional impact is projected, assessed, and proposed to be appropriately mitigated. This is necessary to ensure full compliance with London Plan policies T3 and T4.

- The TA states that "Based on the level of additional trips associated with the Proposed Development and the availability of high- capacity, high- frequency public transport services in proximity to the Site, it is determined that the Proposed Development will have no material impacts on the surrounding transport networks."

We disagree strongly with this given that the site must contribute proportionately to the strategic transport mitigation package agreed separately as part of the wider masterplan. This contention should not be accepted by the Council in your planning assessment of transport impacts and it should be removed from the TA.

- As we have previously commented the 'implemented' development repeatedly referred to includes a number of proposed transport features, for example the residential car parking, and the proposed servicing and deliveries arrangement involving larger delivery vehicles reversing into the service yard from Blackburn Road, which do not comply with the London Plan or the latest Local Plan in transport terms.

For the above reasons we currently object to the application, though we remain engaged in pre application and LU station upgrade engagement discussions with the site owner and are happy to continue negotiation and meetings in order to ensure a viable and optimal solution for the long-term future of the site, considering its complex planning history and potential essential role in creation of a new step free station entrance at West Hampstead, potentially with a new public square at the corner of Blackburn Road and West End Lane.

Please feel free to share my comments with the applicant team and contact me if helpful for further discussions about this application.

Kind regards,

**Gavin McLaughlin MSc; MA; MRTPI**

**Spatial Planning | City Planning**

Construction Logistics Planning (CLP) - Advanced, CIHT/TfL-accredited course

**PLEASE CONFIRM ALL MEETINGS BY CALENDAR**

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