AVISON YOUNG

Planning Statement

Blackheath Station Car Park, Hurren Close, Blackheath, SE3 9LE

March 2025

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Date: March 2025

For and on behalf of Avison Young (UK) Limited

1. Introduction

1.1 This Planning Statement has been prepared on behalf of Blackheath Car Park (M & A) Ltd (Acorn Property Group) ('the Applicant') by Avison Young in support of a Full Planning Application at Blackheath Station Car Park, Hurren Close, Blackheath, SE3 9LE ('the Site').

1.2 The full description of development ('the Proposed Development') is as follows:

> *Erection of three buildings, comprising residential (Use Class C3), flexible commercial and learning and non-residential institution space (Use Class E and Use Class F1), the provision of a farmers market and the associated provision of landscaping works, cycle parking, car parking, plant and associated ancillary works.*

1.3 The purpose of the Planning Statement is to assess the planning considerations associated with the Proposed Development in the context of national, regional and local planning policy, guidance and other material planning considerations. The proposal is the outcome of a rigorous design process, including pre-application discussions with the London Borough of Lewisham (LBL) alongside its Design Review Panel (DRP), residents and other local stakeholders. In addition, the design has incorporated specialist technical input on matters such as heritage and townscape, daylight and sunlight, energy and sustainability, fire, flooding and drainage, noise and vibration, and transport amongst others.

1.4 In summary, the planning benefits being realised by this planning application are as follows:

The development of an important 'gap' site, optimising the use of underutilised, brownfield land for residential-led scheme with flexible commercial and non-residential institute space in a highly accessible and sustainable location;

A heritage-led design connecting a modern addition to the immediate area whilst keeping in harmony with the existing streetscape, conservation area and heritage assets of the surrounding area;

Development of 45 high-quality homes, including a significant proportion of family sized homes of which 11% (by unit) will be wheelchair accessible and 91% will be dual aspect;

A much needed entirely social-rented family sized affordable housing provision in high quality, homes, equating to 21.3% affordable housing by habitable room;

All homes will be tenure blind; energy efficient; fire safe; have access to private and communal outdoor amenity space; have access to children's play spaces; meet minimum size standards; receive good levels of daylight/ sunlight; and will provide residents with appropriate privacy;

Delivery of highly sustainable development, featuring homes with Air Source Heat Pumps (ASHPs), photovoltaic panels, energy-efficient lighting, and mechanical ventilation with heat recovery, all contributing to a well-insulated, airtight thermal envelope exceeding Part L 2021 standards;

Replacement of a car-centric environment characterised by poor-quality buildings and surface car parking;

Delivery of a new public square, providing a farmers market and offering safe pedestrian routes to and from school, on-site play space, new street trees and planting to boost local biodiversity;

The creation of new local employment opportunities delivered through both the construction phase and in the proposed commercial floorspace during the operational phases of the development;

Significant enhancement of urban greening, with proposals achieving 0.465 Urban Greening Factor score and delivering a 113.65% increase in Biodiversity Net Gain, substantially exceeding the 10% statutory requirement;

The creation of attractive place to live, work and play, with a focus on positive place-making and integrating landscape design at the heart of the scheme;

Provision of a new pedestrian, safe route to school;

A boost to town centre vitality and viability through new flexible commercial spaces;

Creation of construction stage jobs and operational stage jobs and financial contributions towards local employment which will be secured by S106 obligation;

Supporting local events, including the London Marathon stacking, through the provision of extensive public realm; and

A socially, environmentally and economically sustainable development that supports both residents and the natural environment.

1.5 The Applicant has engaged in extensive pre-application discussions with LBL planning, design, sustainability and transport Officers since July 2021. Discussions have been also held with the Lewisham Design Review Panel and with other key stakeholders, with the proposals updated in response to feedback. The proposals have also been informed by a meaningful public consultation strategy undertaken by the Applicant at pre-application stage.

1.6 Overall, the Proposed Development aligns with the key policy objectives within the London Plan (2021), LBL's Local Development Framework (which comprises the Core Strategy (2011), Site Allocations (2013), Lewisham Town Centre Local Plan (2014), and Development Management Policies (2014)) and generally meets the objectives of associated planning guidance, including London Plan Guidance documents as detailed in Section 6 of this report.

1.7 This Planning Statement demonstrates that the development complies with the development plan when viewed as a whole, and it should therefore be approved without delay as required by Paragraph 11 Part C of the National Planning Policy Framework (20244). Further details concerning these matters are included within later sections of this Planning Statement and within supporting application documentation.

Submission Documents

1.8 In addition to this Planning Statement, **Appendix I**, sets out the documents and drawings that have been prepared and submitted as part of this application. These documents have been prepared in accordance with the LBL's validation checklist and have been agreed with Officers through pre-application discussions.

Structure of the Planning Statement

1.9 This Planning Statement is set out in the following sections:

Section 2 describes the case for redevelopment;

Section 3 describes the site and surrounding area;

Section 4 identifies the relevant planning history of the Site;

Section 5 discusses the stakeholder engagement, including the pre-application engagement process and how this informed the design development of the Proposed Development. As well as any public consultation undertaken;

Section 6 sets out the development proposals in detail;

Section 7 sets out the relevant national, strategic and local planning context;

Section 8 identifies the material planning considerations of the proposal; and

Section 9 provides an overview of intended Planning Obligations (Head of Terms) and Community Infrastructure Levy costs.

2. The Case for Redevelopment

Background

Blackheath Station Car Park

2.1 The Site is in use as the Blackheath Station Car Park, comprising 162 carparking spaces, two Pay & Display machines, a staff cabin and a cycle storage. The car park represents a continuation of the under-utilised nature of the Site dating back to its historic use in the late 19th century as railway sidings, and its use for storage or construction works in the 1960s. The site was only relatively recently opened as a car park in the latter part of the 20th century.

2.2 The Site lies within the Blackheath Conservation Area, and so heritage is a central consideration from the outset. It is important to note that the Site does not conform to the criteria for making a positive contribution to this Conservation Area (per the Conservation Area Appraisal, Designation and Management: Historic England Advice Note 1), and so there is an opportunity to enhance the contribution the site makes to its historic setting.

2.3 The Site comprises long under-utilised brownfield, public-owned land, primarily functioning as a car park for Blackheath Station (although it is not a dedicated station car park and is not part of the lease held for the station by Southeastern Railway). The Site has been identified by Network Rail as a strategic disposal site, with the aim of generating capital to be re-invested back into Network Rail.

2.4 The disposal of the Site to the Applicant provides an opportunity to unlock the development potential of the Site through sensitive heritage-led and highly sustainable redevelopment in line with NPPF, London Plan and Lewisham Local Plan and draft Local Plan policies for increasing housing supply.

The Market and Marathon Stacking

2.5 The Site's existing role extends beyond parking however, accommodating a weekly farmers' market and a stacking area for the London Marathon. These functions, along with several key considerations have helped inform and shape the Proposed Development to accommodate these functions in a much higher quality environment.

2.6 The Blackheath Farmers' market was first established in September 2000 and forms a significant feature of the Site, contributing to the local economy and fostering community connections through access to fresh, local produced goods. Retaining a market as part of the development has been a fundamental consideration, ensuring its continued role in supporting the community. There has been close engagement with the market operator, on the basis that the Blackheath Farmer's Marker intent

to return to the site, throughout the pre-application process to inform the design of the public realm and ensure it meets the markets current needs, and allows space for its future expansion.

2.7 Additionally, the Site serves a pivotal function during the London Marathon, accommodating c.25,000 visitors annually as they prepare for the event. This unique use underscores the importance of providing safe and efficient space and access from the station platform into the Site. There has been close engagement with the organisers of the London Marathon to design the Proposed Development to meet their future requirements.

The Plan-led Approach

2.8 Planning policy and good practice has shifted since the Site was first provided as a car park, with the focus now placed on promoting more sustainable and inclusive patterns of development. Planning policy at all levels now seeks to remove car parking on sites with high public transport accessibility, and particularly those adjacent to stations where the provision of housing as part of residential-led mixed use development should be promoted. This is in the context of a broader shift in public policy and thinking towards giving greater priority towards human wellbeing; environmental sustainability (particularly the climate change and biodiversity emergencies); promoting alternative travel modes to the car; and addressing the housing crisis.

2.9 These shifts in planning policy and good practice are captured in the development plan affecting the Site. London Plan Policies SD7 and H1 establish firm strategic policy support for the redevelopment of existing car parks for housing-led intensification, which is reaffirmed at the local level in Lewisham's draft Local Plan. This must be considered in the context of Blackheath Conservation Area, and the development has been closely informed by a heritage-led approach to delivering this housing intensification, avoiding and minimising harm in line with statutory, NPPF, London Plan, Local Plan and draft Local Plan requirements.

2.10 There is therefore strong support in policy for the highly sustainable and heritage-led redevelopment of the Site to provide new homes, new commercial/educational space and a replacement farmers' market.

Delivery

2.11 The freehold of the entire Site is owned by Network Rail, with Acorn having a Development Agreement to redevelop the Site.

2.12 In making the best use of land, the impacts of a variety of technical constraints on the Site have had to be accounted for. A Thames Water main sewer currently runs through the Site, necessitating its

relocation and a defined 6-meter no-build zone both horizontally and vertically. Furthermore, along the southern boundary, adjacent to the railway line, the Site is subject to a 2-meter no-build zone required by Network Rail along the full length of the platform. Lastly, a number of mature trees have been identified along both the northern and southern boundaries of the Site. These have been carefully considered to inform the design development process.

2.13 Acorn Property Group, the applicant, have significant experience in delivering high quality developments in sensitive heritage locations winning many design awards over the last 30 years. They appoint some of Britain's best architects to design their projects and ensure a consistently high quality both in the homes and the public realm. Acorn Property Group have a focus on sustainable development through their Acorn Green agenda and have delivered a number of zero carbon homes since 2023.

2.14 Acorn Property Group therefore have the capability to deliver the Proposed Development, and have accounted for the Site's complex technical constraints, and has a strong track record of delivery of high-quality developments on other sites similar to Blackheath Station Car Park.

2.15 It is anticipated that the development will commence in early 2026 with completion around Q2 2028.

The Significant Public Benefits

2.16 The delivery of the Proposed Development will achieve the aims and objectives of the Development Plan and draft Local Plan, and therefore the purpose of the planning system which is to contribute to the achievement of sustainable development. The delivery of public policy in this way ensures that the development is in the public interest.

2.17 The delivery of a new highly sustainable and heritage led redevelopment of a long-underutilised brownfield car park site will generate substantial public benefits, including:

The development of an important 'gap' site, optimising the use of underutilised, brownfield land for residential-led scheme with flexible commercial and non-residential institute space in a highly accessible and sustainable location;

A heritage-led design connecting a modern addition to the immediate area whilst keeping in harmony with the existing streetscape and heritage assets of the surrounding area;

Development of 45 high-quality homes, including a significant proportion of family sized homes of which 11% (by unit) will be wheelchair accessible and 91% will be dual aspect;

A much needed entirely social-rented family sized affordable housing provision in high quality, homes, equating to 21.3% affordable housing by habitable room;

All homes will be tenure blind; energy efficient; fire safe; have access to private and communal outdoor amenity space; have access to children's play spaces; meet minimum size standards; receive good levels of daylight/ sunlight; and will provide residents with appropriate privacy;

A development which enhances the significance of the Conservation Area and surrounding heritage assets;

Delivery of highly sustainable development, featuring homes with Air Source Heat Pumps (ASHPs), photovoltaic panels, energy-efficient lighting, and mechanical ventilation with heat recovery, all contributing to a well-insulated, airtight thermal envelope exceeding Part L 2021 standards;

Replacement of a car-centric environment characterised by poor-quality buildings and surface car parking;

Delivery of a new public square, providing a farmers market and offering safe pedestrian routes to and from school, on-site play space, new street trees and planting to boost local biodiversity;

The creation of new local employment opportunities delivered through both the construction phase and in the proposed commercial floorspace during the operational phases of the development;

Significant enhancement of urban greening, with proposals achieving 0.465 Urban Greening Factor score and delivering a 113.65% increase in Biodiversity Net Gain, substantially exceeding the 10% statutory requirement;

The creation of attractive place to live, work and play, with a focus on positive place-making and integrating landscape design at the heart of the scheme;

Provision of a new pedestrian, safe route to school;

A boost to town centre vitality and viability through new flexible commercial spaces;

Creation of construction stage jobs and operational stage jobs and financial contributions towards local employment which will be secured by S106 obligation;

Supporting local events, including the London Marathon stacking, through the provision of extensive public realm; and

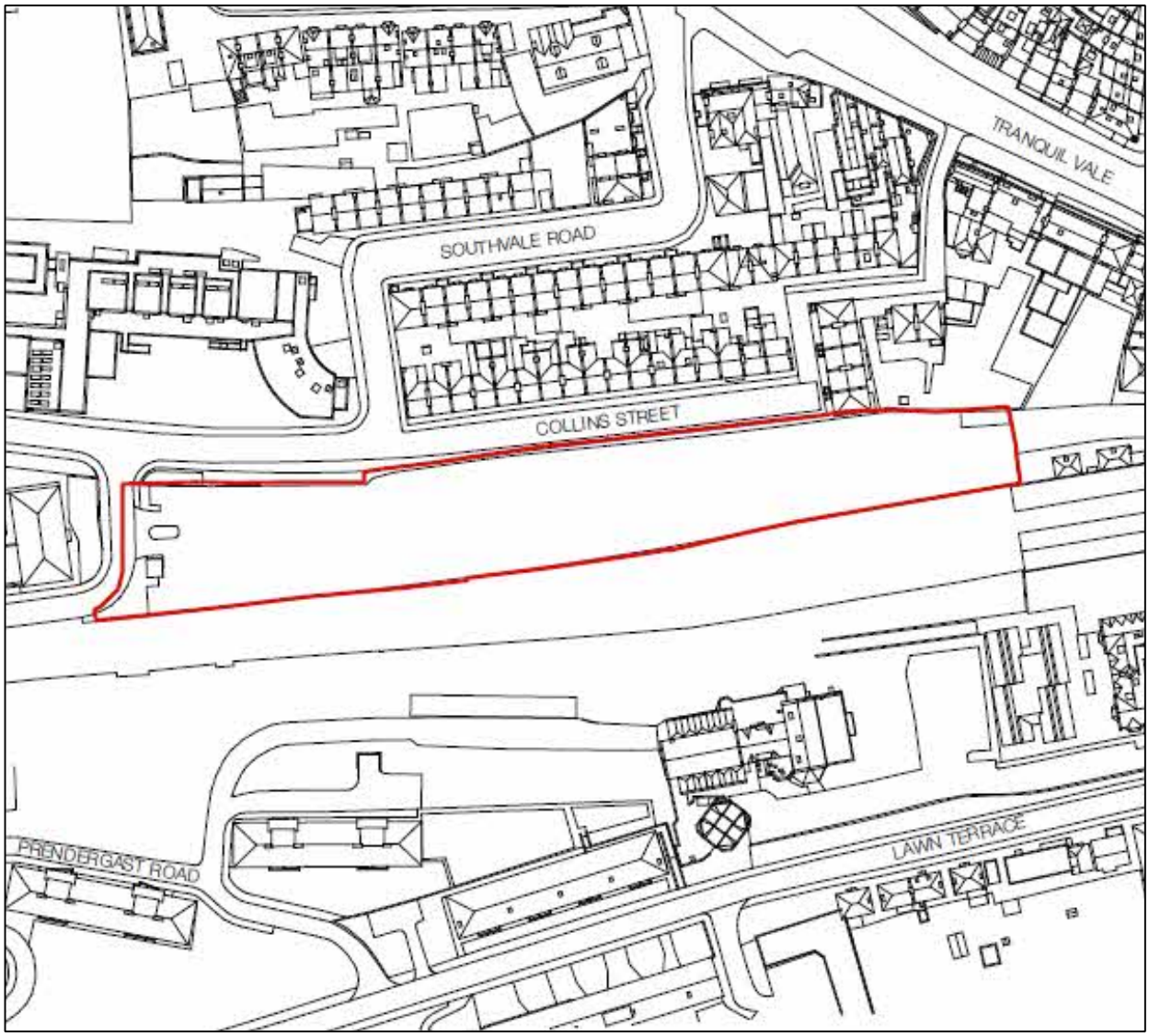
A socially, environmentally and economically sustainable development that supports both residents and the natural environment.

3. Site and Surrounding Area

The Site

3.1 The Site is located in Blackheath, within the London Borough of Lewisham. The Site currently comprises Blackheath Station Car Park, comprising 162 carparking spaces, two Pay & Display machines, a parking booth, staff cabin and cycle storage. The Site is roughly rectangular in shape and extends to circa 0.477ha. A Site Location Plan has been prepared and submitted alongside the application, as set out in Section 1 of this Statement and as seen in **Figure 3.1** below.

Figure 3.1: *Site Location Plan*



3.2 The Site is located to the west of the B212 (Blackheath Village), along the station approach and to the northern side of Blackheath Station. To the north, the Site adjoins Collins Street which is separated from the Site by a timber close boarded fence. Two storey residential terraced properties located on Collins Street face into the Site. At the easternmost end of Collins Street, two storey terraced properties with lower ground floor have a flank relationship with the Site. To the south, the Site

adjoins the railway platforms which extends the full southern boundary of the Site and the Station building is located at the eastern part of the Site. At the westernmost end, the Site adjoins Baizdon Road and Hurren Close which are both fronted by buildings that comprise John Ball Primary School.

Accessibility

3.3 The entrance and exit to the car park are both located on Hurren Close to the west of the site, which is accessed from Baizdon Road. The easternmost part of the Site is occupied by hardstanding that is separated from the rest of the Site by a metal fence and gate. This part of the Site is used by the Blackheath Farmers' Market on Sundays between 10am and 2pm. Controlled vehicular access (barrier) to this part of the Site can be taken from Blackheath Village (B212). Pedestrian access can be obtained through the Site from Hurren Close to Blackheath Village.

3.4 The Site Public Transport Access Level (PTAL) score of 4 – 5, indicating a good level of access to public transport. There is a direct pedestrian route from the eastern side of the car park to the Blackheath Station bus stops on the B212 served by routes 380, 54, 89, 108, 202, and N89. These provide access to key destinations such as Lewisham Shopping Centre, Stratford International, Crystal Palace, and Trafalgar Square. Weekday frequencies range from every 8 to 15 minutes during the day, with the N89 offering half-hourly night services between 00:00 and 05:00.

3.5 Blackheath Station, located immediately east of the site with direct access to the eastbound platform, offers convenient rail connectivity. It is served by Southern services with key routes to London Charing Cross (1 train per hour), London Victoria (2 trains per hour), and London Cannon Street (2-3 trains per hour) on weekdays. These connections ensure efficient access to central London and surrounding areas.

Surrounding Context

3.6 The site is located within an established residential location with good access to local green spaces, community facilities and schools. The surrounding area is characterised predominately by the 2-3 storey terraced dwellings along Collins Street to the north of the Site and the John Ball Primary School to the north west, on Baizdon Road. Just beyond this, to the north and east of the Site, are Blackheath High Street and Railway Station. The High Street comprises low density, mixed use properties, populated with a variety of shops, restaurants, cafes and other town centre uses. To the south, the Site is dominated by the railway line, providing services into the centre of London.

3.7 Blackheath and Greenwich Park are located just to the north of the site, and together provide one of the largest expanses of open space within London. The surrounding area also provides substantial

open space including public gardens, play space and recreational facilities for both the local and wider community.

4. Planning History

4.1 A search of the LPA online planning applications register has been undertaken. There have been several applications in relation of the existing use of the Farmers Market on Sundays between 10am and 2pm.

4.2 Planning permission (ref. DC/21/121756) was granted in August 2021 for the use of Blackheath Station Car Park as a farmers market, held every Sunday with trading hours between 10am and 2pm.

4.3 This permission was subsequently amended by a non-material amendment and Section 73 applications (ref. DC/22/128231 and DC/22/125578). The NMA sought to amend the description of development to remove the reference to operating hours. The subsequent Section 73 application then sought to vary the conditions within the permission to allow for the farmers market to open on Saturdays, to remain open until 4pm and extend closing down hours to 6pm. Both applications were granted in September and October 2022, respectively. As a Section 73 application is a new consent, the extant consent for the market is therefore DC/22/125578.

4.4 Looking further back, full planning permission (ref. DC/15/094683) was approved of the 3rd Feb 2016, for use of the Blackheath Station Car Park, Blackheath Village, SE3 as a farmers market, held every Sunday, with trading hours from 10am to 2pm. This permission expired on in 2021, this reasoning the subsequent applications.

4.5 It is also worth noting that a Prior Approval application was granted in March 2012 (DC/12/079502/FT) for the replacement of the signage within the car park and the installation of a cabin for staff operating the car park.

4.6 A full list of the Planning History is contained in **Table 4.1** below:

Table 4.1: *Planning History*

Reference	Address	Decision	Description of Development
DC/12/079502/FT	Car Park, Blackheath Station, Blackheath Village, London, SE3 9LE	No Objection	Notice of permitted development under Part 17 Class A of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 1995 for the replacement of the signage within the station car park at Blackheath Railway Station Blackheath Village SE3 and the installation of a cabin for staff.
DC/15/094683	Car Park, Blackheath Station, Blackheath Village, London, SE3 9LE	Granted	The use of the Blackheath Station Car Park, Blackheath Village, SE3 as a farmers market, held every Sunday. Trading hours will be from 10am to 2pm.

DC/21/121756	Car Park, Blackheath Station, Blackheath Village, London, SE3 9LE	Granted	The use of the Blackheath Station Car Park, Blackheath Village, SE3 as a farmers market, held every Sunday with trading hours between 10am to 2pm.
DC/22/128231	Car Park, Blackheath Station, Blackheath Village, London, SE3 9LE	Granted	Application submitted under Section 96a of the Town & Country Planning Act 1990 (as amended) for a non-material amendment to planning permission DC/21/121756 dated 20 August 2021 to amend the wording of the description o development to remove reference to the operating days and times of the farmers market at Blackheath Station Carpark (Farmers Market), SE3.
DC/22/125578	Car Park, Blackheath Station, Blackheath Village, London, SE3 9LE	Granted	An application submitted under Section 73 of the Town & Country Planning Act 1990 (as amended) for a Minor Material Amendment in connection with the planning permission DC/21/121756 dated 19 August 2021 to allow a variatio of Conditions (2) and (5) to extend the operating hours until 4:00 pm, extend operating days of the market to also include Saturday and to extend closing down and removal hours until 6pm at Blackheath Station Car Park (Farmers Market), SE3.

5. Pre-application Consultation

5.1 This Section of the Planning Statement provides an overview of the design development and engagement process relating to the proposals. It summarises the discussions held with LBH officers, residents and other key stakeholders. In summary, an extensive and robust pre-application engagement process has been undertaken.

5.2 Further details of the public stake holder consultation undertaken can also be found in the Statement of Community Involvement (SCI), prepared by Kanda Consulting and submitted alongside this application.

Summary of Pre-application Engagement

5.3 The Applicant entered into a Planning Performance Agreement (PPA) with the LBL at pre-application stage in July 2024, engaging in pre-application discussions with Officers since prior to this (July 2021) and over the intervening period.

5.4 During the pre-application period, meetings were held with the LBL Planning, Design, Conservation, Transport, and Sustainability officers as part of a comprehensive programme of pre-application consultation. Formal discussions with Officers commenced in July 2021 and have been ongoing, involving 13 total meetings, design review panels, and technical workshops. The feedback provided by Officers has helped scope the content of this planning application and has shaped the Proposed Development.

5.5 Given the Site's location within a Conservation Area and its proximity to nearby listed properties, design and heritage were the key consideration throughout the pre-application process. A number of different iterations for the Site have been discussed with Officers, and the Applicant consulted with the Council's Design Review Panel in July 2023 and April 2024. The feedback received across these meetings has been carefully considered by the Design Team and has influenced the Proposed Development. This is set out in greater detail in Section 7 of the Design and Access Statement, prepared and submitted alongside this application.

5.6 Other key issues covered by the Applicant's pre-application discussions with LBL included:

The approach to height, scale and massing;

The impact on the Conservation Area and the views to be assessed within the application submission;

A reduction in car parking and the impacts on the transport network and highways, including the servicing strategy;

Landscaping and Public Realm, including the provision of market space and accommodation of stacking on marathon day; and

Sustainability and Drainage, including water reuse systems and flood mitigation strategies.

5.7 A total of 5 formal pre-application meetings have taken place with LBL Officers throughout the extensive pre-application period. This has been supplemented by a further 6 technical pre-application meetings and 2 meetings with Lewisham's Design Review Panel. **Table 5.1** below, sets out the schedule of pre-application meetings held to date.

Table 5.1: *Schedule of Pre-application Meetings*

Meeting Title	Date	Primary Discussion Topics
Pre-Application Meeting 01 (Concept Meeting)	21.07.2021	Redevelopment Vision. Planning Policy and Designation Considerations. Operational and Accessibility Improvements. Stakeholder Engagement.
Pre-Application Meeting 02	05.04.2022	Design and Sustainability Update. Parking and Transport Provision. Site Integration and Accessibility (including heritage implications and provision of the market). Affordable Housing and Commercial Use
Pre-Application Meeting 03	03.03.2023	Car Parking and Market Operations. Design and Public Realm. Sustainability and Viability.
Technical Design Meeting	23.05.2023	Site and Market Integration. Design updates on Blocks A, B and C. Public Realm and Parking. Sustainability and Viability.
Design Review Panel 01	19.07.2023	Principle of Development and Layout. Design and Architecture. Sustainability and Infrastructure.
Pre-Application Meeting 04	22.02.2024	Parking and Commercial Use Architectural Design and Heritage Considerations The Mews Street and Accessibility
Design Review Panel 02	17.04.2024	Parking and Public Realm Blocks A, B and C Design and Architecture Sustainability and Landscaping
Technical Highways Meeting	24.07.2024	Car Parking Delivery and Servicing

Technical Sustainability and SUDs Meeting	07.08.2024	SUDs and Water Management Sustainability and Heating Systems
Technical Ecology and Landscape Meeting	08.08.2024	Ecology and Biodiversity Landscaping and Green Corridor Public Realm and Materials
Technical Heritage Meeting	15.08.2024	Heritage and Visual Impacts Design Sensitivity and Scale Considered Views
Technical SUDs Follow Up Meeting	05.09.2024	SUDs and Water Management
Pre-Application Meeting 05	06.09.2024	Design Refinements Parking and Landscape Updates Consultation

Public Consultation

5.8 A fundamental element of the pre-application process was to ensure a clear and meaningful public consultation process is undertaken, which in turn has benefitted the design and quality of the Proposed Development.

5.9 Public Consultation was first undertaken in July 2022 when a letter was issued to neighbouring addresses introducing the emerging proposals and encouraging interested recipients to share their comments and questions. In September 2024 a dedicated consultation webpage was launched. Neighbouring properties were notified of this via newsletter distribution and door knocking was undertaken in the local area to promote the public consultation.

5.10 In September 2024, the first in person event was held as members of the team help a pop-up event on weekly farmers market. A flyer was distributed to approximately 1826 addresses in the local area in October 2024 inviting residents to attend the public drop in consultation event. The drop in consultation event was held on 21st October which gave members of the public an opportunity to view proposals, speak with project team members and leave feedback. A total of 103 people attended the in-person public consultation event.

5.11 Between August 2021 and November 2024 numerous letters and meetings have been issued and held with relevant political and community stakeholders, as set out below, to provide information and progress updates in regard to the proposed development:

[redacted]hen-Blackheath Ward Member
[redacted]then-Blackheath Ward Member
[redacted] – Blackheath Ward Member
[redacted]– Blackheath Ward Member
[redacted]Ward Member for Blackheath
[redacted], Ward Member for Blackheath Westcombe

[redacted], Ward Member for Blackheath Westcombe
[redacted], Ward Member for Blackheath Westcombe
John Ball Primary School
Blackheath Farmers' Market
The Blackheath Society

5.12 A full summary of the consultation approach and feedback received, is provided within the Statement of Community Involvement, prepared by Kanda Consulting and submitted alongside this application.

6. Proposed Development

6.1 This section of the Planning Statement sets out the Proposed Development in greater detail. Full planning permission is sought for the following works at the Site:

> "*Erection of three buildings, comprising residential (Use Class C3), flexible commercial and learning and non-residential institution space (Use Class E and Use Class F1), the provision of a farmers market and the associated provision of landscaping works, cycle parking, car parking, plant and associated ancillary works.*"

Proposed Layout, Height and Massing

6.2 The proposals comprise the erection of 3 no. buildings across the Site as set out below:

Block A;

Block B; and

Block C.

6.3 Block A is located to the east of the Site, fronting onto the proposed market square and existing station entrance, just off the B212 (Tranquil Vale). The building comprises a 4-storey block, with c.123sqm of ground floor flexible commercial and non-residential institution floorspace (Use Class E / F1) and 5 no. residential homes (Use Class C3) in the floors above. The commercial space will front onto both the market square to the east and the mews to the south. Primary access to the residential core is located to the north of the Block, accessed from Collins Street. In addition to the residential homes and commercial floorspace, the block contains ancillary accommodation, bike stores, bin storage and associated plant areas.

6.4 Block B is a located along the centre of the Site and comprises a row of 20 no. terraced houses (Use Class C3). Each unit will be split across three floors, with access to a private balconies and roof-level terraces. The homes will primarily front onto Collins Street to interact with the existing streetscape. Additional access will be located along the south along the proposed mews street.

6.5 Block C will be located to the west of the site, comprising a 5-storey block fronting Baizdon Road to the north and Hurren Close to the west. The ground floor will comprise c.308sqm of flexible commercial and non-residential institution floorspace (Use Class E / F1). The floors above will comprise 20 no. residential homes (Use Class C3), with primary access located along Baizdon Road to the north. In addition to the residential homes and flexible commercial floorspace, the block contains ancillary accommodation, bike stores, bin storage and associated plant areas.

6.6 The primary access to the residential homes within all three blocks will be from the north side of the site, via Collins Street and Baizdon Road. Additional pedestrian and vehicular access will be provided through a proposed mews street along the southern boundary, connecting to Hurren Close to the west. While the eastern end of the mews will be closed, it will still accommodate emergency access, as well as servicing and delivery needs for Block A, with bollard-controlled access to the B212. The site will also feature several pedestrian routes, including pathways between Blocks A and B, as well as between Blocks B and C, aiming to ensure seamless connectivity throughout the development. Furthermore, a new pedestrian route is proposed along the northern boundary, to enhance access between the station and Tranquil Vale to Collins Street and the surrounding residential areas including the John Ball Primary School.

Proposed Residential Homes

6.7 The Proposed Development provides a total of 45 homes (Use Class C3). The proposed unit mix by Block is set out in **Table 6.1** below.

Table 6.1: *Proposed Dwelling Mix*

	Block A	Block B	Block C	Total	Percentage
2B3P	0	0	1	1	2.22%
2B4P	3	0	11	14	31.11%
3B5P	1	20	6	27	60.01%
3B6P	1	0	0	1	2.22%
4B6P	0	0	2	2	4.44%
Totals	**5**	**20**	**20**	**45**	**100%**

6.8 The residential homes will comprise a mix of Market (78.7%) and London Affordable Rent (21.3%), tenures, calculated by habitable room. The unit and habitable room mix broken down by tenure is set out in **Table 6.2** below.

Table 6.2: *Residential Unit Mix by Tenure*

	Units			Habitable rooms		
	Market	London Affordable Rent	Total	Market	London Affordable Rent	Total
2B3P	1	0	**1**	3	0	3
2B4P	14	0	**14**	42	0	42
3B5P	21	6	**27**	106	30	136
3B6P	1	0	**1**	4	0	4
4B6P	0	2	**2**	0	12	12
Total	**37**	**8**	**45**	**155 (78.7%)**	**42 (21.3%)**	**197**

6.9 The proposals notably include 30 family-sized homes (66.67% of the sitewide mix). Further details regarding the residential mix can be found within the Design and Access Statement and Schedule of Accommodation submitted alongside this planning application.

Accessible Housing

6.10 The proposal includes 5 accessible homes (scaled to accord with Building Regulations Part M4(3)). This equates to an overall provision of 11.1% accessible homes within the Proposed Development. These accessible homes are proposed to comprise 5 no. 3-bedroom 5person homes.

Residential Quality and Amenity

6.11 Each residential unit meets or exceeds the relevant minimum space standards for housing (as set out in London Plan Policy D6) and is served by private amenity space, either in the form of a private garden, roof terrace or balcony, that meet or exceed minimum standards.

6.12 The proposed homes have been designed to ensure good levels of internal daylight and sunlight for future occupiers, with further details set out in the Daylight, Sunlight and Overshadowing Assessment submitted alongside this application.

6.13 The scheme has been designed to maximise the number of dual aspect homes, with 41 no. homes (91.1%) being of dual aspect or better (in line with the London Plan (2021) definition). There are no north-facing single aspect homes.

6.14 Further details concerning these matters can be reviewed within the Design and Access Statement submitted alongside this application.

Proposed Non-Residential Floorspace

6.15 The Proposed Development provides a total of 427.7sqm (GIA) of non-residential floorspace. This includes the provision of flexible commercial and non-residential institution floorspace (Use Class E and F1). Table 6.3 below sets out the provision by block.

Table 6.3: Non-residential Floorspace

	Block A	Block B	Block C	Totals
Flexible Commercial and Non-residential Institution Floorspace (Use Class E / F1)	123.4	0sqm	304.3sqm	**427.7sqm**
Totals	**123.4sqm**	**0sqm**	**304.3sqm**	**427.7 sqm**

6.16 The total floorspace will be broken up between the ground floor of Block A and the ground floor of Block C.

6.17 The ground floor commercial units with Block A and Block C are intended for flexible commercial and non-residential institution floorspace (Use Class E / F1) (Use Class E). This is to ensure an active frontage is provided which faces onto the market square and the station approach and throughout the site.

6.18 The Applicant have been in discussions with the adjacent John Ball Primary School for over 12 months who are interested in the commercial units, given this they have been designed in such a way that they would be suitable to be utilised as educational space. Discussions remain ongoing, therefore the scheme seeks permission for flexible use of the commercial spaces (Use Class E / F1).

Public Realm and Landscaping

6.19 The Proposed Development provides a carefully considered public realm and landscaping strategy, which promotes connectivity, supports community cohesion, and creates high-quality spaces for residents and visitors alike.

6.20 The strategy delivers a number of landscaped areas to deliver functional, attractive and flexible environments that meet the needs of the community. These principally comprise the Market Place, the Mews Street, The Play space and the Public Realm route along the north of the Site.

Market Place - designed to provide a dynamic and adaptable space for community activities, particularly the provision of the weekend's farmers' market. High-quality paving seeks to subtly denote the areas around the commercial unit, access to the station platform and the start of public routes to the south and north of the development. A replacement bike hub will offer secure cycle storage, enhanced by a biodiverse green roof to support ecological objectives. Raised planters with flower-rich planting and new trees with integrated seating areas, will provide opportunities for rest and social engagement.

Mews Street - running along the southern boundary of the Site has been designed as a pedestrian-priority area. The street will feature high-quality paving materials, such as PCC

setts and cobbles, which will define the space and contribute to its distinctive character. Paving patterns will delineate the carriageway and parking areas, improving safety while promoting pedestrian movement. Soft landscaping elements, including planting beds, trees, and climbing plants, will soften building facades and enhance visual appeal.

Play Space - a dedicated area between Blocks B and C, designed to provide opportunities for recreation, relaxation, and social interaction. It will feature low-key play equipment, offering a safe and engaging environment for children. The inclusion of sensory planting will create an enhanced experience for users, contributing to the wellbeing of residents. The play space has also been strategically positioned to provide a seamless connection between the Mews Street and the Public Realm Route, integrating it effectively into the wider development.

Public Realm - along the northern edge of the site, which establishes a vital connection between Blackheath Village and the station, to Collins Street and John Ball Primary School on Southvale Road. This route is enhanced by high-quality paving with inlaid patterns that visually reinforce the pathway to the school, making it both functional and aesthetically appealing. The newly designed footway improves accessibility to existing on-street parking along Collins Street, ensuring a safer and more convenient environment for pedestrians. Additionally, the paving within the Market Place has been carefully orientated to intuitively guide pedestrians towards this key public realm route. Further to this, Collins Street will become a more pleasant environment for members of the public with new trees, greenery and a wider footpath to ensure safer pedestrian routes.

6.21 The overall public realm and landscaping strategy adopts a landscape-led approach, ensuring that public realm spaces are flexible, inclusive, and adaptable for a variety of uses. The design prioritises sustainability and supports social interaction, creating a distinct, high-quality environment that will serve both the immediate community and the wider area for years to come.

Farmers' Market and Marathon Stacking

6.22 As set out in Section 2 of this Planning Statement, the existing Site currently supports the weekly Blackheath Farmers Market and serves as an annual 'stacking' area for approximately 25,000 visitors attending the London Marathon.

6.23 With regards to the Farmers Market, planning permission (ref. DC/21/121756) has secured 840sqm of market space for Blackheath Village Farmers Market, supporting up to 40 market pitches. The subsequent permission (ref. DC/22/125578) allows for operating hours between 10am – 4pm on Saturdays and Sundays. The Proposed Development comprises a 70% increase on the currently

approved demise, seeking to deliver 1,425sqm of market space. This expanded area will enable market pitches along the newly created Mews Street to the south, between Blocks A and B, as well as within the designated Market Square to the east.

6.24 The Proposed Development has been designed to safely accommodate the influx of approximately 25,000 visitors on Marathon Day. To facilitate this, parking will be temporarily suspended, and additional temporary steps will be installed at two locations along the southern boundary to enhance access. Furthermore, ongoing coordination with South Eastern Railway and the marathon organisers has ensured the establishment of a 5-7m clear zone along the southern boundary, allowing for the safe and efficient egress of passengers from the station platform.

Highways and Transport

Car Parking

6.25 The Proposed Development will be car-free for the proposed uses with the exception of 2 no. accessible parking spaces for residents. One accessible space will be located in the southwest corner of the Site, with an additional space provided on the southern side of Baizdon Road to provide improved access to the residential entrance in Block C.

6.26 Additionally 17 no. car parking spaces, including the provision of 2 no. accessible spaces will be provided on Site for public use associated with Blackheath Station. Subject to the agreement of the existing operator or a new operator, one of the general spaces will be assigned for Car Club use as per the existing Zipcar space on Site. These spaces will also accommodate van-parking for market traders on market trading days.

6.27 Two passing places are provided along the Mews Street to ensure vehicles can pass without needing to reverse. A turning head is provided between Block A and Block B to ensure that vehicles can leave the Site in forward gear.

Cycle Parking

6.28 The cycle parking requirements for the Proposed Development have been considered in line with the standards set out within London Plan Policy T5 and have been set out in **Table 6.4** below.

Table 7.4: *Cycle Parking Provision*

	Long Stay Spaces		Short Stay Space		Total
	Residential	Non-Residential	Residential	Non-Residential	
Block A	11	0	2	14	**27**
Block B	40	n/a	0	n/a	**40**

Block C	40	0	2	8	**50**
Total	**91**	**0**	**4**	**22**	**117**

6.29 The secure and covered bike hub proposed within the southeast corner of the Site will provide at least 40 additional spaces. This will further bolster the cycle parking provision for the Proposed Development, station users, and visitors of Blackheath.

Delivery, Servicing and Waste

6.30 A Delivery and Servicing Management Plan (DSMP) has been prepared and submitted alongside the application. This provides further and more detailed information on the delivery and servicing strategy for the proposed development.

6.31 Commercial refuse collection for Block A is proposed to occur within the Site boundary. Refuse vehicles will enter via Hurren Close and exit via the B212. Automated bollards on the mews street to the south of Block A will restrict access through to the market square and B212 for refuse collection and emergency vehicles only.

6.32 Delivery vehicles servicing Block A will enter via Hurren Close, reverse within the turning head between Block A and Block B and exit the site via Hurren Close. Further details are provided within the DSMP.

6.33 Individual collections from the houses in Block B will take place from Collins Street, replicating the arrangement currently in place with the terraced properties on the north side of Collins Street. It is proposed to reconfigure the resident permit holder bays on the south side of Collins Street and mark-out individual bays to create appropriate gaps for waste handlers to transfer bins to the refuse vehicle. The 'give way' markings at the western end of Collins Street will be reconfigured to ensure there is no net loss in resident permit holder parking availability.

6.34 Residential and commercial refuse collection for Block C is proposed from Baizdon Road where a refuse vehicle can stop within 10m of the bin store. Delivery vehicles servicing Block C can wait on the double yellow lines on Baizdon Road for up to 20 minutes when loading/unloading.

Energy and Sustainability

6.35 A sustainability strategy has been developed for the Proposed Development which inform the design and construction phases to ensure the integration of sustainable design practices into all aspects of decision making. The Proposed Development incorporates the following sustainable technologies:

An overall on-site reduction of 88% in regulated carbon dioxide emissions over Part L 2021;

Maximum integration of Photovoltaic panels, using all available roof and canopy spaces;

All heating and hot water will be from Air Source Heat Pumps;

The reduction of heat entering the properties, via orientation of glazing, external shading and triple glazed windows with a g-value of 0.45;

Providing passive ventilation, via openable windows and promoting cross-ventilation where possible;

Providing mechanical ventilation with heat recovery, not to replace the passive ventilation, but to provide additional fresh air load to assist primarily with night time ventilation; and

The integration of green landscaping throughout to maximise BNG and UGF.

6.36 An Energy and Sustainability Statement, providing further information on the proposed energy and sustainability strategy, has been prepared by Box Twenty and submitted alongside the application.

7. Planning Policy Context

7.1 This section of the Planning Statement sets out the relevant Development Plan context relevant to the Site, in addition to other key policy considerations.

Adopted Planning Policy

7.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) makes it clear that 'if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the [development] plan unless material considerations indicate otherwise'.

7.3 The adopted Development Plan for the LBL relevant to the Site comprises the following:

The London Plan (2021);

Lewisham Core Strategy (2011); and

Lewisham Development Management Local Plan (2014);

7.4 The National Planning Policy Framework (NPPF) (December 2024) and associated Planning Practice Guidance are a material consideration in the determination of planning applications.

7.5 The London Plan and Lewisham Local Plan are supplemented by numerous Supplementary Planning Documents (SPDs) and Supplementary/London Planning Guidance (SPGs/LPGs), which are also a material consideration. These include the following of relevance to the Proposed Development:

Optimising Site Capacity: A Design-led Approach LPG (June 2023)

Air Quality Positive LPG (February 2023)

Air Quality Neutral LPG (February 2023)

Housing SPG (2016)

Affordable Housing and Viability SPG (2017)

Housing Design Standards LPG (2023)

Urban Greening Factor LPG (February 2023)

Sustainable Transport Walking and Cycling LPG (2022)

London View Management Framework SPG (2012)

Social Infrastructure (2015)

Accessible London: Achieving an Inclusive Environment (2014)

The control of dust and emissions during construction and demolition (2014)

Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy (Updated 2016)

Play and Informal Recreation (2012)

All London Green Grid (2012)

Planning for Equality and Diversity in London (2007)

'Be Seen' energy monitoring guidance (2021)

Energy Assessment (2022)

Characterisation and Growth Strategy (2023)

Small Site Design Codes (2023)

7.6 The Mayor is currently preparing the Draft Fire Safety LPG (2022), Draft Affordable Housing LPG (2023), and Draft Development Viability LPG (2023), which were all scheduled to be finalised and published in late 2023 but have yet to be published in their final form.

Draft Planning Policy

London Plan

7.7 Preparation of a new London Plan commenced in 2024, which (it is anticipated) will need to be prepared in the context of a revised NPPF. An early draft of the new London Plan is expected in early/mid 2025. As no document has yet been produced, this carries no weight at present.

Local Plan

7.8 On the 13th February 2025, the Council launched the public consultation on the Proposed Main Modifications to the Lewisham Local Plan. Given this, the Council will give appropriate weight to relevant policies, and this Planning Statement similarly affords some weight to the policies contained within the draft Local Plan, in line with Paragraph 49 of the NPPF (December 2024).

7.9 In the Regulation 22 Draft Local Plan Policies Map (Jan 2023) the site remains designated within the Conservation Area, and the Major District Centre. The adjacent railway line also continues to be designated at a SINC and a Strategic Open Space.

Site/Area Specific Policies

7.10 The Site is not allocated for development in the adopted Local Plan nor is it located within a London Plan Opportunity Area. It is also not proposed to be allocated in the draft Local Plan.

Policy designations

7.11 The Site is located within the Blackheath Conservation Area and there are a number of listed buildings within the vicinity of the Site. These include;

Grade II Listed “Blackheath Railway Station” to the east;

Grade II Listed “29, 31, 31A, 33 and 35, Tranquil Vale SE3” to the north;

Grade II Listed “23-27, Tranquil Vale SE3” to the north east;

Grade II Listed “11-21, Tranquil Vale SE3” to the east;

Grade II Listed “3-9, Tranquil Vale SE3” to the east;

The Grade II Listed “45 and 47, Tranquil Vale SE3” and “1-3, Collins Square SE3” also lie to the north of the site, beyond Collins Street.

7.12 The site is in Flood Zone 1 and so has a low probability of flooding. Isolated parts of the site are at high risk of surface water flooding.

7.13 The site is also subject to the following planning policy designations:

Blackheath Conservation Area;

Lewisham Air Quality Management Area;

Blackheath Major District Centre; and

7.14 The site also lies directly adjacent to the railway line which is designated as a Green Corridor and a Site of Importance for Nature Conservation (SINC).

7.15 The site is also subject to the following planning designations:

Blackheath Conservation Area;

Lewisham Air Quality Management Area; and

Blackheath Major District Centre.

7.16 The site also lies directly adjacent to the railway line which is designated as a Green Corridor and a Site of Importance for Nature Conservation (SINC).

7.17 The following other designations also apply:

The Site has a PTAL of 4-5; and

The Environment Agency's online flood mapping tool indicates that the Site is located in Flood Zone 1 (low risk of flooding), with parts of the Site at risk of surface water flooding.

8. Planning Assessment

8.1 This section of the Planning Statement provides an assessment of the key planning considerations associated with the Site, paying due regard to relevant policies in addition to key guidance and other material considerations. It is structured as follows:

I. Principle of Development

II. Land Use Matters

- a. Housing
- b. Educational Uses
- c. Main Town Centre Uses
  - i. Flexible commercial floorspace
    - a. Sequential Test
    - b. Retail Impact Assessment
- d. Farmers' Market

III. Housing Delivery

- a. Affordable Housing
- b. Unit Size Mix
- c. Housing Quality
- d. Children's Play

IV. Residential Quality

- a. Accessible Housing
- b. Internal Space Standards
- c. Aspect
- d. Internal Light
- e. Private Outdoor Amenity Space
- f. Communal Amenity Space
- g. Children's Play Space

V. Design

- a. Design-led Approach

b. Quality and Character

c. Layout, Height and Massing

d. Experience

e. Safety and Security

VI. Heritage

VII. Energy and Sustainability

VIII. Biodiversity and Urban Greening

a. Ecology and Biodiversity

b. Urban Greening Factor

IX. Highways and Transport

a. Access

b. Car Parking

c. Cycle Parking

d. Delivery and Servicing

X. Technical Considerations

a. Fire

b. Flood Risk and Drainage

c. Noise and Vibration

d. Daylight and Sunlight on Neighbouring Properties

e. Overshadowing

f. Trees

g. Air Quality

h. Contamination

I. Principle of Development

8.2 The NPPF paragraph 110 sets out that significant development should be focused on locations which are sustainable, through limiting the need to travel and offering a genuine choice of transport modes; this can help to reduce congestion and emissions, and improve air quality and public health.

8.3 Importantly, paragraph 125 requires substantial weight to be given to using suitable brownfield land in settlements for new homes and the approval of such proposals unless "substantial harm" would be caused. It goes on to identify sources of brownfield land and that planning policies and decisions should "…*promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards,* ***car parks,*** *lock-ups* ***and railway infrastructure****)*…". [our emphasis].

8.4 The London Plan (March 2021) sets out strategic Good Growth objectives, including making the best use of land by optimising brownfield sites for residential-led development, seeking a modal shift to walking, cycling and public transport use and improving London's air quality. London Plan Objective GG2 requires development to prioritise sites that are well-connected by public transport, particularly for intensifying the use of brownfield and surplus public sector land and delivering additional homes.

8.5 Of key relevance to the Proposed Development, London Plan Policy H1 sets out that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, especially for the mixed-use redevelopment of car parks and sites with PTALs 3-6 within 800 metres of a station. In addition, Policy SD7 (C) recognises the capacity of low density sites, including surface car parks (such as Blackheath Station Car Park), for housing intensification and mixed-use redevelopment.

8.6 This is reflected in the London Plan transport policies, with London Plan Policy T1 seeking a modal shift across Inner London, with 90% of all trips being made by walking, cycling and public transport by 2041. To help achieve this, London Plan Policy T6 sets out that car-free development should be the starting point for all development proposals in places well-connected by public transport. Absence of local on-street parking controls should not be a barrier to new development.

8.7 Spatial Policy 1 of the Lewisham Core Strategy (2011) states that, in line with the over-arching Lewisham Spatial Strategy, provision will be made for an additional 18, 165 net new dwellings and higher density development will need to be compatible with public transport accessibility.

8.8 Of relevance, Policy HO1 of the draft Lewisham Local Plan (2023) states that a carefully managed uplift in the delivery of new housing will be achieved by directing new residential development to well-connected and sustainable locations, consistent with the spatial strategy for the Borough.

8.9 Policy HO2 sets out that development of small sites will play an important role in increasing housing supply and that opportunities should be taken to optimise the capacity of such sites through redevelopment of vacant and underused brownfield sites, for example.

8.10 Policy TR1 of the draft Lewisham Local Plan (2023) states that the integration of land use and transport, along with an effective public transport network, are essential to delivering inclusive, healthy, liveable and sustainable neighbourhoods in Lewisham. It further states that development proposals will be expected to make the most effective use of land, and optimise the capacity of sites, by taking into account connectivity and accessibility to existing public transport.

Assessment

8.11 The existing Blackheath Station Car Park provides 162 spaces. The Proposed Development will result in a reduction in car parking to 17 spaces (including two accessible Blue Badge spaces) available to the public.

8.12 There are no development management policies within the NPPF, London Plan, Local Plan and draft Local Plan that protect existing station car parks. Indeed, as noted above, policies at all levels recognise such underused sites as potential sources of sustainable, brownfield housing capacity to address London's housing needs.

8.13 In redeveloping the existing station car park, the Proposed Development would clearly meet NPPF, London Plan and draft Local Plan policy requirements, including the requirements in the site allocation, to optimise the development of this brownfield and highly sustainable site for residential-led development.

8.14 Notwithstanding this, it is important to consider the impact of the loss of the existing car park. As previous examples of similar development in London, the Inspectors for the appeals at Arnos Grove (ref. APP/Q5300/W/21/3276466) and Wembley Station Car Park (ref. APP/T5150/V/21/3275339) all made reference to the outcome of parking surveys that indicated trips could be better made locally by active and sustainable modes. The Inspectors considered that the benefits and harm arising from the loss of car parking on surrounding streets could be addressed by way of Controlled Parking Zones and considered the residual impacts from the loss of car parking on those unable to use any means

other than car (for example those with mobility issues) in the planning balance. In both cases, the loss of car parking was found to be acceptable on balance.

8.15 Taking this approach, the applicant has carried out four parking surveys over 2018, 2021, 2022 and 2024, with the latest being in June 2024 (as detailed in the Transport Statement, Appendix G). The latest survey in June 2024 demonstrates that 22% of those parking vehicles in the car park were making use of Blackheath Station, 41% for Blackheath Village, 33% for Baizdon Road (the location of John Ball Primary School) and 4% for other purposes.

8.16 Blackheath Station Car Park is located in a highly sustainable location, with numerous bus routes serving the station, including the 54, 108, 202, 89 and N89 providing services from Lewisham, Lee, Catford, Woolwich, Plumstead, Shooters Hill, Bexleyheath, Westcombe Park and North Greenwich, which all with the exception of Shooters Hill also have railway stations or London Underground stations of their own. It is also notable that within a 2km radius of Blackheath Station there are numerous other stations providing services into Central London, including Lewisham, Lewisham DLR station, Elverson Road DLR station, Greenwich, Greenwich DLR station, Maze Hill, Kidbrooke, Lee and Hither Green. Therefore, not only is Blackheath Station readily accessible by public transport, in all directions except there are alternative stations in close proximity providing similarly frequent services into Central London. There is therefore no need to use the private car to reach the station, except for those with mobility issues or disabilities. These trips would be more sustainably made through walking, cycling or public transport to access the station, in line with the London Plan and draft Local Plan requirements to encourage greater use of active and sustainable modes of transport.

8.17 It is recognised that people also use the station to access Blackheath Village District Centre. The parking survey identifies the highest demand for car parking at 12:30pm on weekdays, with 55 car parking spaces used. It is notable that this is far below the number of spaces actually available on the Site, at 163 spaces, demonstrating that this Site is underutilised for its current parking use. With the loss of the car park, the Transport Statement identifies that of these spaces, and accounting for re-provided spaces, 16 spaces would need to be found on surrounding streets or in Blackheath Grove car park for this displaced parking demand at the peak time of 12:30pm. The Transport Statement identifies that 8 of spaces would be available at this peak time. Though this would not meet all of the demand at this time, it is important to note that the intent of the London Plan, Local Plan and draft Local Plan is to reduce vehicle trips, with a 90% modal shift by 2041 in Inner London. The removal of these car parking spaces is entirely consistent with this.

8.18 Although seeking the elimination of car parking entirely from the Site, officers have raised during pre-application discussions the impact of the loss of car parking on the vitality and viability of Blackheath

Village District Centre. Only 8 vehicles would be unable to park during peak hours and when compared to the 45 new homes proposed. Therefore, using a conservative estimate of two people per home and vehicle, as a result of the Proposed Development there would be up to 90 more people living within or adjacent to the town centre on the Site, and therefore spending within the town centre, compared to only 16 people who would have travelled by car. It is accepted that not all of those living in the Proposed Development will be home during the weekday, but it is likewise also possible that every car is only occupied by one person. It is therefore clear by any reasonable estimate that there would very likely be at least as many people living in the development visiting in the town centre compared to the displaced car visitors; indeed, residents would also generally be more likely to spend in the town centre as it will be their closest and most convenient shopping destination. The loss of the car park would therefore not cause harm to the vitality and viability of the Blackheath Village District Centre.

8.19 Finally, the parking survey identifies that people are using the car park to visit Baizdon Road (largely to pick up and drop off children at the John Ball Primary School). It is important to note that this demand has decreased steadily since 2018. The Applicant is committed to working with the John Ball Primary School to implement a School Travel Plan to encourage a modal shift away from private vehicle use for dropping off and picking up schoolchildren, and is agreeable to an obligation to pay for the reasonable costs associated with this. This will further reduce the demand for parking from this user group.

8.20 People with disabilities would still be able to park in the Blue Badge spaces provided on-site. For those unable to use the Blue Badge spaces and who find it more difficult to access the station by other means (including for example people with mobility issues and pregnant people), 15 standard spaces would remain on the Site that can be used by this group of people. These spaces can also be used to meet the evidenced general residual demand for parking on the Site as set out in the Transport Statement.

8.21 Residents would be prevented from parking on nearby streets through the use of existing Controlled Parking Zones, as they will be ineligible for applying for a residents parking permit. They will be made aware of the car parking free proposals through the use of a welcome pack, which will set out the car park management procedures and systems in place. The entirety of Blackheath falls within Zone BHA, in which parking is restricted to permit holders only between 9am and 7pm Monday to Saturday.

8.22 As such, the loss of the car parking would encourage more people to walk, cycle or take public transport to access the station, as a result of being unable to easily park to access the station. This would concurrently result in a reduction in trips by car to the station, based on weekday arrival

activity alone between 07:00-20:00, it is envisaged that the redevelopment will result in the reduction of 39,520 vehicle trips directly to the site annually. Overall, significantly reducing congestion on surrounding roads, as well as improving air quality. This would all help to meet the modal shift and air quality policy objectives set out in the London Plan. People who need to access the station by car – for example those with mobility issues – would still be able to do so by making the use of Blue Badge spaces, the remaining 15 car parking spaces, or drop-off facilities. The new residents would also be more likely to spend money in Blackheath Village District Centre than existing car drivers accessing the car park.

8.23 The Proposed Development specifically seeks to implement the policies set for this site in both the London Plan Lewisham's Local Plan and Draft Local Plan in the removal of all non-essential station car parking provision except for 17 essential spaces whilst mitigating the impact of this through additional controlled parking measures and access improvements to the station by sustainable travel modes.

8.24 Therefore, in the overall planning balance the redevelopment of this brownfield car parking site, and associated loss of car parking, would be wholly compliant with national, strategic and local planning policies that seek the optimisation of brownfield sites for development. The proposed heritage-led and sustainable redevelopment of the Site would result in significant public benefits in terms of encouraging walking, cycling and use of public transport, reducing congestion and improving road safety, improving air quality, supporting the viability and vitality of town centres, maintaining inclusive access to the station and prioritising brownfield development opportunities.

8.25 Therefore, in line with the NPPF, London Plan and local planning policies the principle of this highly sustainable, heritage led, redevelopment of an underutilised brownfield car park site is acceptable and the Proposed Development should therefore be approved.

II. Land Use Matters

Housing

8.26 Chapter 11 of the NPPF directs that policies and decisions should promote an effective use of land in meeting the need for homes and other uses. In achieving this, substantial weight should be given to the value of using suitable brownfield land within settlements for homes and other identified needs.

8.27 Paragraph 125 of the NPPF is clear that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Planning policy and decisions to give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be regarded as acceptable in principle.

8.28 Under the provisions of paragraph 226 of the NPPF, LPAs are required to demonstrate an up-to-date 5 year housing land supply (FYHLS).London Plan Policy H1 sets Lewisham an annualised housing target of 1,667 homes per annum between 2019/20 and 2028/29. The draft Lewisham Local Plan targets 2,212 homes per annum to achieve 11,060 homes over the initial 5 year period of the draft Local Plan.

8.29 London Plan Objective GG2 supports development of brownfield land and seeks to intensify the use of land to support additional homes and workspaces, promoting higher density development. London Plan Objective GG4 supports provision of homes for Londoners, taking into account strategic affordable housing targets and creating mixed and inclusive communities.

8.30 London Plan Policy H1 supports proactive use of brownfield land for residential-led development, including car parks adjacent to stations, and sets LB Lewisham a ten year housing target of 16,670 homes between 2019/20 and 2028/29.

8.31 Policy SD7 also requires that Boroughs should realise the full potential of existing car parks to deliver housing intensification through redevelopment and ensure such locations become more sustainable in transport terms, by securing improvements to public transport, cycling and walking.

8.32 Draft Local Plan Policy HO1 states that the Council seek to ensure that all development makes the best use of land and optimise the capacity of housing sites in line with DLLP QD6.

8.33 Draft Local Plan Policy QD6 states that consideration must be given to the appropriate development density to establish the optimum capacity of a site having regard to, in particular to PTAL levels.

Assessment

8.34 The principle of residential development on this brownfield station car park is strongly supported by the London Plan, the Local Plan and the draft Local Plan.

Educational Uses

8.35 London Plan Policy S1 states that developments that provide social infrastructure that meets a local or strategic need should be supported. London Plan Policy S3 specifically supports the provision of good quality education and childcare facilities, which should be located in areas of identified need, in accessible locations linked to footpath and cycle networks, and that are accessible and inclusive for a range of users, among other requirements.

8.36 Lewisham Local Plan DM Policy 42 sets out that proposals for the education of children to consider traffic volumes and the effect on congestion, accessibility by walking, cycling and public transport, movement through the site- including for disabled users – the impact on local residential amenity and the need for suitable space for outside play areas.

8.37 Lewisham's Draft Local Plan Policy CI1 sets out that consideration should be given to the delivery of new or enhanced community infrastructure on site. Draft Policy CI2 sets out further requirements for the provision of new community infrastructure, including similar requirements to the London Plan with respect to accessibility, as well as ensuring flexibility and adaptability of space is maximised, that the use is sufficiently functional and viable for its intended use, that it is available for use by the public as much as reasonably possible and that it does not result in a significant adverse impact on the amenity neighbouring uses and properties.

8.38 The Proposed Development includes the provision of flexible floorspace falling Use Class F1/Use Class E. This flexible floorspace has been designed such that it could be utilised for educational use. The applicant has been in discussions with the nearby school, John Ball Primary School, over the past 12 months noting the need for additional floorspace to enable the school to expand its facilities which confirmed a clear local need for the space, satisfying the requirement of London Plan Policy S3.

8.39 The uptake of the proposed non-residential floor space by the school has not been confirmed at the point of submission and therefore, to ensure units are not vacant at the point of delivery, the flexible non-residential floorspace would revert to being used as Use Class E (the provision of which is considered in further detail below).

8.40 The London Plan, Local Plan and draft Local Plan all require educations floorspace to be in an accessible location, with access to walking and cycling routes and inclusive access for people with disabilities. The Proposed Development is in a highly sustainable location next to Blackheath Station, with direct access to surrounding footpaths and cycle routes, both off and on site. In any case, the

floorspace will be used by the John Ball Primary School, meaning any associated trips will already form part of the School's existing travel patterns. As such, it is not expected to generate trips of its own.

8.41 As set out in Section 8 of this report, the educational floorspace is also not expected to result in any negative impacts on residential amenity either within or outside of the development, for example with respect to noise. The space is designed to be flexible and adaptable to the school's needs. It would not have any outdoor space associated with it, but the floorspace would be directly linked to providing additional educational needs, potentially for John Ball Primary School which already benefits from outdoor play areas.

8.42 The flexible educational floorspace therefore meets the requirements of London Plan Policies S1 and S3, Local Plan Policy DM42 and draft Local Plan Policies CI1 and CI2.

Main Town Centre Uses

8.43 Specifically, paragraph 85 supports planning policies and decisions which help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

8.44 Chapter 7 of the NPPF sets out the principles to ensuring the vitality of town centres.

8.45 Paragraph 90 of the NPPF requires planning policies and decision to support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.

8.46 In achieving this, Paragraph 91 directs that LPAs should apply a sequential test to planning applications for main town centre uses (including retail and office uses) which are neither in an existing centre nor in accordance with an up-to date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered. Paragraph 94 goes onto require an impact assessment to be undertaken for retail and leisure proposals outside town centres which are not in accordance with an up-to-date plan if the proposal is over a locally set floorspace threshold. Paragraph 95 confirms that where an application fails to satisfy the sequential test or is likely to have a significant adverse effect on tow centres, it should be refused.

8.47 London Plan Policy SD7 stipulates that when considering development proposals, boroughs should take a town centres first approach, discouraging out-of-centre development of main town centre

uses. SD7 requires that where proposals involve the redevelopment of existing out-of-centre retail/leisure parks, this should not result in a net increase in retail or leisure floorspace unless the proposal is in accordance with the development plan or can be justified through sequential and impact assessments.

8.48 Local Plan DM Policy 13 adopts a town centres first approach. However, a sequential test and impact assessment are only required for retail floorspace provision over 1,000 sqm in size where these fall outside of a town centre.

8.49 Draft Local Plan Policy EC12 also adopts a town centres first approach and applies a sequential test to all main town centre uses that fall outside of a town centre. A Retail Impact Assessment (RIA) is applied where more than 500 sqm of gross floorspace or more at edge-of-centre or out-of-centre locations is proposed.

8.50 Notwithstanding the town centres first approach, it is important to recognise that strategic policies do allow Main Town Centre Uses to be located outside of town centre where sequential and impact policy tests (where applicable) are satisfied.

Flexible commercial floorspace

8.51 The proposed development includes 427.7 sqm of 'flexible' commercial accommodation to be used for Use Class E(a-g).

8.52 Of this 123.4 sqm of accommodation would be located within Block A, which is located within Blackheath Village District Centre. The proposed flexible commercial floorspace within a town centre is wholly acceptable in line with the town centres first approach set out in the NPPF, London Plan, the Local Plan and the draft Local Plan.

8.53 The remaining 308.2 sqm of floorspace is located outside of the town centre boundary in an edge of centre location. This Applicant has been in discussions with the neighbouring John Ball Primary School for use of the space as an educational facility and so this floorspace is proposed as flexible Use Class F1 and E floorspace. However, it is acknowledged that in the event the school does not take up this floorspace, then this would revert to Use Class E floorspace.

8.54 In line with the London Plan, the Local Plan and the draft Local Plan, a sequential test is therefore required.

Sequential test

8.55 It is important for reasons of practical use that the flexible educational/commercial floorspace is located adjacent to the John Ball Primary School, to facilitate its use by the school. This floorspace therefore cannot be disaggregated from its proposed location and must be provided in the western part of the Site. Therefore, this floorspace cannot be located within a town centre and, given that the closest town centre boundary to the school is within the site itself, no other alternative sites are capable of being suitable.

8.56 Therefore, there are no other sequentially preferable locations for the flexible educational/commercial floorspace if it is to appropriately meet the needs of the school.

Retail Impact Assessment (RIA)

8.57 Development Management Policy DM13 sets out that proposals for retail provision of 1,000 square metres gross floorspace or more on the edge or outside of the major and district centres will require an impact assessment. Draft Local Plan Policy EC12 Part E also outlines that a RIA will only be required for development proposals of main town centres uses of 500 square metres gross floorspace or more at edge-of-centre and out-of-centre locations.

8.58 As the flexible educational/commercial floorspace outside of Blackheath Village District Centre, at 304.3 sqm, is less than 1,000 sqm (per Local Plan DM Policy 13) and 500 sqm (per draft Local Plan Policy EC12) in scale, an RIA is not required.

Market

8.59 London Plan Policy E9 support London's markets in their full variety, including street markets, covered markets, specialist and farmers' markets, complementing other measures to improve their management, enhance their offer and contribute to local identity and the vitality of town centres.

8.60 Lewisham Draft Local Plan Policy EC20 sets out that development proposals must protect and seek to enhance existing markets and market spaces. The draft policy gives priority to retaining markets as part of the town centre offer and ensuring appropriate re-provision of market space where there is demonstrable demand.

8.61 The provision of a farmers' market is a fundamental and intrinsic part of the Proposed Development on the Site from the outset, which has been informed by extensive and ongoing engagement with the operator of the market, on the basis that they will return. The Proposed Development will provide a Farmers' Market, with space for 40 market pitches provided and 9 parking spaces for vans associated with the market. This represents a 70% increase on the currently approved demise of the market.

8.62 The Proposed Development proposes to retain the same opening hours for the market as approved in DC/22/125578, with the market operating from 10am to 4pm on Saturday's and Sundays, with a closing down period until 6pm. The delivery and servicing arrangements have resulted from information provided by the Market Operator's and are set out in detail in the Delivery and Servicing Plan.

8.63 The market would operate within the square to the east of Block A, extending along the Mews Street to the south of Block B alongside the northern station platform at Blackheath Station. The provision of street markets is a common feature of town centres across London, with the nearest example being in Lewisham Town Centre. The provision of markets on streets with a residential character is also not uncommon and would be similar to markets such as Columbia Road Flower Market in Bethnal Green, which also has homes directly fronting into the market space. The market would operate during the day and is not expected to result in adverse impacts on existing and new residents, for example with respect to noise. Overall, this represents a much higher quality space for the market to operate in that will support the wider vitality and viability of the town centre.

8.64 As such, the provision of a farmers' market with room to expand is entirely in accordance with the London Plan and draft Local Plan and represents a significant benefit of the Proposed Development.

III. Housing Delivery

8.66 There is a chronic shortage of housing in the UK and London is experiencing a well-documented housing crisis.

8.67 NPPF para 61 makes it clear that the Government's objective is to significantly boost the supply of homes and that one of the overall aims of the planning system should be to meet as much of an area's housing need as possible. NPPF paragraph 125 advises planning policy and decisions to give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be regarded as acceptable in principle.

8.68 This principle is carried forward into London Plan Objective GG4 (delivering the homes Londoners need) and Policy H1 (increasing housing supply) that sets housing targets for each borough. The housing targets set by Policy H1/Table 4.1 seek to deliver 52,300 new homes per annum, which is significantly short of the need for 66,000 new homes per annum identified in the London-wide Strategic Housing Market Assessment (SHMA) undertaken in 2017 to inform the London Plan. The targets are based on estimates of capacity (as identified in the London-wide Strategic Housing Land Availability Assessment (SHLAA) (2017)), as opposed to meeting the needs of Londoners in full.

8.69 London's actual housing need is almost 88,000 new homes per year following the current Standard Method for calculating housing need, as set out by the NPPF (December 2024). It is clear is that the current London Plan annual new home targets (including the requirement for LBB) fall substantially short of actual needs.

8.70 Worse still is that recent annual London-wide completion rates have fallen significantly short of the targets set by the London Plan, with an average completion rate of 37,000 new homes per annum over the past 3-years (2020-23). This is less than half the number of homes that Londoners need and around one-third of the most recent assessment of the actual needs of Londoners referred to above.

8.71 Recent data published by the Ministry of Housing, Communities and Local Government showed that LB Lewisham's Housing Waiting List has 11,008 households in 2024 placing significant pressure on Lewisham and other councils across London to find both temporary and permanent accommodation to meet this need.

8.72 Lewisham's draft Local Plan sets out at Table 7.1 that to address this need, 45% of social or London Affordable Rent homes need to be three or four bedroom homes. As a consequence, there is a significant and urgent need for developers, local communities, and planning authorities to do everything they can to boost the supply of new homes of all tenures across London, including in

Lewisham. The planning policy response to this is clear. The capacity of sites to accommodate new homes should be optimised following a design-led approach (NPPF para. 129, 135, 146; London Plan Objective GG2 and Policy D3; Core Strategy Policy 1 and draft Local Plan Policies HO1, HO3) and that planning applications that accord with an up-to-date development plan should be approved without delay.

8.73 In the context of the above significant and urgent need to boost the supply of homes, the Proposed Development seeks to make the best use of this brownfield site for the delivery of homes. The proposed quantum of development of 45 homes has been fundamentally informed by the support for the redevelopment of brownfield sites to deliver highly sustainable development and by a design-led approach to optimising site capacity within a sensitive heritage context. On this basis the quantum of development is acceptable in line with the NPPF, London Plan Objective GG2, and Policy D3 and draft Local Plan Policies CDH01 and GSS11.

Affordable Housing

8.74 Planning policies seek to secure the maximum reasonable level of affordable housing as part of major development proposals.

8.75 London Plan Policy H4 states that the strategic target is for 50% of all new homes delivered across London to be genuinely affordable. To achieve this, major developments are required to provide affordable housing in accordance with the threshold approach described under Policy H5. The Policy adds that affordable housing should be provided on Site. Off site, or cash-in-lieu contribution is only accepted in exceptional circumstances.

8.76 London Plan Policy H5 sets out the threshold approach to affordable housing delivery. Where the application does not meet the requirements of the threshold approach, the application must follow the Viability Tested Route in which, a detailed supporting viability assessment will be submitted as part of the application, as is the case with the forthcoming application. The Proposed Development seeks to balance the delivery of much needed homes, with achieving a deliverable scheme in a sensitive heritage context, and maximising the delivery of affordable housing. In the context of the significant and urgent need to boost the supply of homes, the Proposed Development seeks to make the best use of this highly sustainable, underutilised, brownfield car park for the delivery of homes. The viability testing exercise has demonstrated how a balance can be achieved to ensure the viable delivery of affordable housing, The Proposed Development directly addresses the Council's housing waiting list by prioritising family-sized homes that would address this urgent need, and so 21.3% affordable housing provision as 100% high-quality London Affordable Rent three bedroom five person and four bedroom six person homes proposed as representing the maximum amount of affordable

housing on the site. This proposal will provide significant benefits to the community by addressing the growing need for affordable housing, particularly considering the constraints of the site, including the sensitive heritage context, and in the context of a London-wide collapse in starts of new affordable homes.

8.77 The viability assessment, which has been subject of assessment with the Council's independent viability consultant, therefore demonstrates that the affordable housing provision within the Proposed Development, responds directly to the urgent need for family-sized social rented homes and is the maximum amount that can be provided, in line with London Plan Policies H4 and H5, Core Strategy Policy 1 and draft Local Plan Policies HO1, HO3.

IV. Residential Quality

8.78 London Plan Policies D6 to D7 (read in conjunction with the Mayor's Housing Design Standards LPG), Core Strategy Policy 1 and draft Local Plan Policy QD8 set extensive policy requirements to ensure new homes are built to an appropriately high standard. Details of the Proposed Development and its compliance with these standards is set out below. It should be read in conjunction with the DAS and the Accommodation Schedule submitted with the application.

Accessible Housing

8.79 11% of homes (measured by unit) are designed to meet Building Regulation requirements for M4(3) 'wheelchair user dwellings'. The affordable rent units are designed to M4(3)(2)(b) standards (wheelchair accessible) while the market units are designed to M4(3)(2)(a) (wheelchair adaptable) standards.

8.80 Details are included in the DAS that demonstrate how the layout of M4(3)(2)(a) homes can be adapted in the future to meet the needs of a wheelchair user.

8.81 This accords fully with the requirements of London Plan Policies D5, D6 and D7, Local Plan Policy DM02 and LBB draft Policy CDH01.

Internal Space Standards

8.82 All of the homes meet or exceed the following internal space standards:

- 1-bed/1-person – 39sqm
- 1-bed/2-person – 50sqm
- 2-bed/3-person – 61 sqm
- 2-bed/4-person – 70 sqm
- 3-bed/5-person – 86 sqm
- 3-bed/6-person – 95 sqm
- 4-bed/5-person – 103 sqm
- 4-bed/6-person – 112 sqm

8.83 Some homes exceed these standards (as encouraged by London Plan para 3.6.2), including M(4)(3) units.

8.84 All homes accord with the following minimum size standards for the combined area of living, dining and kitchen spaces as set out within the GLA Housing Design Standards LPG:

- 2-bed/3-person – 25 sqm

- 2-bed/4-person – 27 sqm
- 3-bed/5-person – 29 sqm
- 3-bed/6-person – 31 sqm
- 4-bed/six person – 31 sqm

8.85 All homes have been designed to have a main sitting space of at least 3m wide (1B1P/1B2P homes) and 3.5m for all other homes.

8.86 All homes include built-in storage spaces.

8.87 Refer to the DAS for further details which includes fully furnished floor plans to demonstrate that all homes are functional and fit for purpose.

8.88 The above aligns with the Nationally Described Space Standards and accords with the requirements of London Plan Policy H6 (including Table 3.1), Lewisham Core Strategy Policy 1 and LBL draft Local Plan Policy QD8.

Aspect

8.89 91% of the homes are dual aspect across the development. Of this, 58% are dual aspect, 29% are triple aspect and 4% are quadruple aspect.

8.90 London Plan Policy D6 states that single aspect homes should be avoided, particularly for homes that are north-facing, contain three or more bedrooms or are exposed to noise levels with significant adverse effects on health and quality of life are expected to occur. Only four homes within the development are proposed to be single aspect and all four are south facing and are not family homes. All homes would generally have good outlook, would avoid overheating as set out in more detail within the Thermal Comfort Report submitted with the application, and the distances between buildings will ensure appropriate levels of privacy within homes.

8.91 London Plan Policy D3 requires the optimisation of site capacity through making the best use of land, having regard to the site's character, context and capacity for growth. Making. Making the best use of land includes ensuring buildings are efficiently designed and sustainable, and includes the need to provide efficient building cores and ensuring an efficient building form factor to reduce heat loss from buildings. These considerations mean that it is impractical to provide 100% dual aspect homes on the Site, and therefore dual aspect homes have been maximised in line with London Plan Policies D3 and D6.

Internal light

8.92 The Daylight and Sunlight Report prepared by CHP Surveyors submitted with the application sets out details on the internal light levels received within the Proposed development.

8.93 With regards to daylight, the results demonstrate that 124 of 126 rooms, 98%, would receive compliance levels of internal daylight in accordance with BRE guidelines. The two rooms that do not meet the target level of daylight are less than 13 sqm and therefore are not considered habitable rooms. Given this, it can be taken that the proposed development receives adequate levels of internal daylight.

8.94 With regards to sunlight, the results demonstrate that of 27 homes analysed, 26 have at least one room that enjoys 1.5 hours of sunlight internally on 21st March, aligning with BRE guidelines.

8.95 Considering the sites orientation, the proposed development will provide accommodation with good access to daylight and sunlight relative to BRE guidelines and in keeping with national and local planning policy.

Private Outdoor Amenity Space

8.96 Policy D6 of the London Plan sets London-wide standards for the provision of private outdoor amenity space. A minimum of 5sqm should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant. Space must achieve a minimum depth and width of 1.5m.

8.97 Lewisham Core Strategy Policy 15 sets out that that development should provide a high level of amenity space. Furthermore, draft Local Plan Policy QD8 stipulates that outdoor amenity space provision should align with the standards described in London Plan.

8.98 The proposed development delivers a policy compliant amount of private and communal amenity space as follows:

- All four-bedroom, six person homes will have access to a minimum of 9 sqm of private amenity space in the form of balconies.
- Al three-bedroom, five person homes will have access to a minimum of 8 sqm of private amenity space in the form of balconies/ terraces.
- All two-bedroom, four person homes will have access to a minimum of 7 sqm of private amenity space in the form of balconies/ terraces.
- All two-bedroom, three person homes will have access to a minimum of 6 sqm of private amenity space in the form of balconies/ terraces.

8.99 Access to private balconies/ terraces will be step-free and from the main living areas. These spaces have been designed and located to optimise their useability with a balance of openness and protection for the particular characteristics of each home.

Communal Amenity Space

8.100 A total of 936.8 sqm private outdoor amenity space is provided in the form of private balconies terraces, and communal gardens.

Children's Play Space

8.101 Play areas for future residents have been calculated based on the GLA calculator for child yield and population yield. As set out in Table 8.2 below, 276.9 sqm of play is required for the development.

Table 8.2: *Play space provision by age group*

Age group	Play space requirement (sqm)	Proposed provision (sqm)	Balance of provision (sqm)
Ages 0-4	108	106.5	-1.5
Ages 5-11	90	106.5	+16.5
Ages 12-18	78	0	78
Total	**276**	**213**	**63**

8.102 A total of 213 sqm of play space is proposed. This is an 63 sqm under provision.

8.103 For full details relating to the play space provision, please refer to the landscape strategy within Section 14 of the Design and Access Statement.

V. Design

Design-led Approach

8.104 The NPPF sets out the overall aim to meet as much of an area's identified housing need as possible and supports making "as much use as possible" of brownfield land. Paragraph 129 supports the effective use of land, taking into account factors such as: the identified need for housing; viability; the capacity of infrastructure and services; the desirability of maintaining an area's prevailing character and setting; and the importance of securing well-designed, beautiful, attractive and healthy places.

8.105 The NPPF, Section 12, further states that the creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Paragraph 139 of the NPPF emphasises how significant weight should be given to development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes as well as outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

8.106 The Government's National Design Guide was published in October 2019 (updated in January 2021). The guide sets out the characteristics of well-designed places and demonstrates what good design means in practice comprising of ten characteristics including 'context', 'identity', 'built form', 'movement', 'nature', 'public spaces', 'uses', 'homes & buildings', 'resources' and 'lifespan'.

8.107 London Plan Objective GG1 suggests that development should help deliver strong and inclusive communities by ensuring new buildings and spaces are designed to reinforce or enhance the identity, legibility, permeability and inclusivity of neighbourhoods.

8.108 London Plan Policy D3 requires development to optimise Site Capacity through the design-led approach. This can be achieved by ensuring the most appropriate form and land use for the site. This approach considers design options that respond to a site's context, capacity for growth, and existing or planned infrastructure.

8.109 Core Spatial Policy 15 of the adopted Lewisham Local Plan states that the Council must ensure any development conserves and enhances the borough's heritage assets, and the significance of their settings, such as conservation areas and listed buildings.

8.110 Lewisham Draft Local Plan Policy QD1 states that development proposals must follow a design led approach to contribute to delivering high quality, inclusive, safe, healthy, liveable and sustainable

neighbourhoods in Lewisham and that development proposals must demonstrate an understanding of the site context and respond positively to Lewisham's local distinctiveness by providing for buildings, spaces and places that reinforce and enhance local character.

8.111 Lewisham Draft Local Plan Policy QD3 states that development proposals must use the design led approach to secure a high quality public realm. They must respond positively to the role of the public realm in contributing to local distinctiveness and supporting inclusive, safe, accessible, attractive and well connected places and spaces.

Assessment

Quality and Character

8.112 The applicant has positively and proactively engaged with LBL planning officers and key stakeholders engaging in extensive pre-application discussions, amending proposals in line with design comments following a number of pre-application meetings and Quality Review Panel discussions. The design has been scrutinised through this process which has positively influenced the high-quality design, the heritage of the surrounding streetscape have informed the overall design, incorporating high quality, well considered buildings which seek to enhance the character and appearance of the Proposed Development in its setting.

8.113 As set out within the DAS, the design maximises housing on the Site, a new public square, enhanced Farmer's Market, on-site play, safe pedestrian routes and increased biodiversity. The Proposed Development has been designed to the highest quality, ensuring a positive impact and contribution to the local surroundings, creating a true sense of place and an inclusive community where occupiers and nature can grow and flourish, in line with local, regional and national planning policy.

8.114 The quality and character of the Proposed Development therefore accords with the NPPF, London Plan, Local Plan and draft Local Plan with respect to heritage

Layout, Height and Massing

8.115 As a fundamental starting point, the highly sustainable redevelopment of this underutilised brownfield car park is supported by all levels of policy and the proposed land use, in the form of a residential led mixed-use development and provision of a farmers market, being the most appropriate use of the site in line London Plan Policy H1.

8.116 The proposed layout of the site with the development along the northern boundary and access along the south with the public square to the east has been informed primarily by the constraints within the site including pedestrian route to school, existing trees, existing farmer's market and associated

vendor parking, Marathon ‘stacking’ o an annual basis, existing sewer with a 10m no build zone and Network Rail no build zone adjacent to the railway line.

8.117 The three block built form is separated with spaces and play space between offering views across the site to break up the massing of development, massing articulation responding to context, scale and local heritage.

8.118 The proposed form of buildings responds positively to the character of the existing built form in the surrounding area, with a range of building footprints, massing, and heights reflective of their position, function and townscape function (including interaction/integration with the immediate surroundings adhering the relevant planning policies in relation to design.

Experience

8.119 The Proposed Development, through the delivery of residential homes, flexible commercial units and farmers marker, provide active surveillance throughout the Site. Buildings have been designed to create a safe, secure and inclusive community that can be enjoyed equally by all users. All three proposed blocks fit into the surrounding streets with active frontages, high quality design and materials which are in keeping with the unique character of the conservation area in which they are located.

8.120 Design of the scheme promotes healthy lifestyle including walking to school, the station and surrounding streets providing excellent links to the village and its facilities.

8.121 Opportunities to increase the permeability for pedestrians and cyclists through the Site have been maximised in a safe manor, providing access through the site and the provision of a new public square, creating a true sense of place and inclusive community.

8.122 The Proposed Development encourages and facilitate active travel with convenient and inclusive pedestrian and cycling routes and legible entrances to the buildings, which have been aligned with people’s anticipated movement patterns through the Site.

Safety and Security

8.123 The Proposed Development would make extensive use of overlooked streets and spaces to provide passive surveillance as well as the existing train station. The commercial units within Block A and C would provide active frontages onto the public road and the proposed homes which will make up Block B along the centre of the site will have home working space facing onto mews street offering passive surveillance.

8.124 The proposed public square has been designed with all users in mind, and the site itself has been designed to ensure a safe pedestrian route to and from school.

8.125 As demonstrated in the Design and Access Statement, the development is well designed, with high quality architecture complemented by extensive landscaping and areas of public open space. The development therefore achieves the national, regional and local policies and objectives on design.

VI. Heritage

8.126 The Planning (Listed Buildings and Conservation Areas) Act 1990 describes the statutory tests which deal with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. If it is judged that harm to the heritage asset(s) would arise from the proposed development, considerable importance and weight must be attributed to that harm, in order to comply with the statutory duties.

8.127 Chapter 16 of the NPPF guides the conservation and enhancement of the historic environment.

8.128 Paragraph 200 requires applications which impact heritage assets to describe the significance of any heritage asset affected. The level of which should be proportionate to the asset's importance.

8.129 Paragraph 203 adds that in determining applications, local authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.

8.130 When considering the impact of a proposal, paragraph 205 directs that that where a proposed development would lead to 'substantial harm' or total loss of heritage significance of a designated heritage asset, consent should be refused, '..unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss', or all of a number of specified criteria apply, including that the nature of the heritage asset prevents all reasonable uses of the site.

8.131 Paragraph 207 adds that where a development proposal will lead to 'less than substantial' harm to the heritage significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

8.132 Paragraph 213 acknowledges that not all elements of a Conservation Area will necessarily contribute to its significance.

8.133 London Plan Policy HC1 requires development proposals affecting heritage assets, and their settings, to conserve their significance by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm

and identify enhancement opportunities by integrating heritage considerations early on in the design process.

8.134 Local Plan DM Policy 36 requires that where the significance of heritage asset may be harmed or lost through physical alteration or destruction, or development within its setting, the Council will require clear and convincing justification, which will be considered alongside the wider public benefits which may flow from the development.

8.135 Draft Local Plan Policies HE1 and HE2 relate to Lewisham's historic environment, and designated heritage assets. Policy HE1 seeks to preserve or enhance the significance of Lewisham's historic environment and its setting, including through heritage-led regeneration and urban renewal, and requiring proposals to demonstrate that all reasonable measures have been investigated to avoid harm to heritage assets. Policy HE2 further sets out that development within Conservation Areas will only be supported where proposals preserve or enhance the character and appearance of the Conservation Area, and that proposals that detract from the special characteristics of a Conservation Area will only be supported where they will complement and positively impact on the character and significance of the area. Policy HE2 sets out that that development proposals that would result in substantial harm to the significance of a Listed Building and its setting will be strongly resisted in line with the NPPF.

Assessment

8.136 The BHTVIA considers the impact of the Proposed Development on a number of heritage assets within the Site's wider context, the full list of which is summarised in Section 8 of the BHTVIA. A summary assessment of the impacts on statutory designated assets and key locally designated assets within the immediate locality of the Site is set out below.

8.137 For the Grade II listed Blackheath Railway Station, there will be intervisibility between the new buildings on the Site (notably Block A) and the station building in views looking west along the access road between the station building and Tranquil Vale terraces to the immediate north. However, the scale and materiality of the development is sympathetic to the station building, and Block A has been purposefully set back though the creation of a new market square, with these improvements to the public realm and landscaping improving the setting of the listed building. As such, the Proposed Development Proposed Development, through the provision of high -quality, contextual architecture and associated public realm improvements is considered to enhance the setting and appreciation of the significance of the Grade II listed Blackheath Railway Station.

8.138 For the Grade II listed 3-9 Tranquil Vale, the Proposed Development will introduce three new buildings to the rear of these designated heritage assets. However, due to the falling topography of the Site, the Proposed Development – Block A – would only be visible with the principal front elevation of No. 3 Tranquil Vale. Block A would remain subservient to the listed terrace, and would demonstrate a high quality of design and materiality that is sympathetic to this heritage asset, and the provision of landscaping and public realm improvements will be of benefit to the setting of the terrace. As such, the Proposed Development will enhance the appreciation of the significance of the Grade II listed 3-9 Tranquil Vale.

8.139 For the Grade II listed Blackheath Quaker Meeting House, the Proposed Development will introduces three new buildings of up to five storeys within the immediate setting of the listed building. However, the Site bears no historic or functional relationship with the building, and therefore the Proposed Development will not be located within an element of the listed building's setting that contributes to an understanding of its significance. Notwithstanding this, there will be limited intervisibility between the Site and the Quaker Meeting House, due to topography, intervening development and vegetation present even in the winter. Any intervisibility is mitigated by high quality design that references the prevailing Neo-Classical style and terraced character of its surroundings, and through measures that have reduced the perception of the mass of the building, such as bronze-coloured cladding on Block A. The Proposed Development will not impact on the significance of the Grade II listed Quaker Meeting House, and thus its special interest is preserved.

8.140 For the Blackheath Conservation Area, the Proposed Development introduces three buildings of up to five storeys into the Conservation Area. Overall, the Proposed Development will enhance the character and appearance of the Blackheath CA, through the implementation of high-quality and contextual architecture which repurposes a large car park that is at odds with the village like character of its surroundings. The proposed market square references the lively, shopping environment of Blackheath, whilst the provision of residential accommodation through a terrace like typology mitigates this transitional zone between the centre of Blackheath and its quieter, residential surroundings. Retaining a farmers market, within a newly proposed market square will maintain and enhance a key character of the Conservation Area. It is thus considered that the Proposed Development will enhance the character, appearance and significance of the Blackheath Conservation Area.

8.141 For the locally listed Winchester House, the Proposed Development would introduce three new buildings within the setting of this building. However, the Site bears no functional or historic relationship with this building, and it is not located within an element of the building's setting that contributes to an understanding of its significance. Notwithstanding this, there would be some

intervisibility between the buildings on the Site and Winchester House, though this would be limited by intervening development and the extent of vegetation even in the winter. The architectural design of the Proposed Development, and references to the prevailing Neo-Classical style in the surrounding area would further contextualise the Proposed Development. Therefore, no harm is caused to the significance of the locally listed Winchester House.

8.142 Fundamentally, the Proposed Development seeks to achieve the sensitive heritage-led regeneration of a brownfield car parking site that is ultimately at odds with the surrounding village-like character of Blackheath, achieving this through a high quality of architecture and materiality that is sympathetic to its context. This therefore wholly accords with the requirements of London Plan Policy HC1 and draft Local Plan Policies HE1 and HE2 which support sensitive heritage-led regeneration.

8.143 Furthermore, in line with the NPPF, the London Plan, the Local Plan and the draft Local Plan, the development would enhance the significance of several heritage assets including the Grade II listed Blackheath Railway Station, the Grade II listed 3-9 Tranquil Vale and the Blackheath Conservation Area. It would preserve the special interest of the Grade II listed Blackheath Quaker Meeting House, and would cause no harm to the significance of the locally listed Winchester House. No harm is therefore identified to any heritage assets.

8.144 Even if this were not the case, in line with NPPF paragraph 215, any less than substantial harm to the heritage significance of a designated heritage asset identified should be weighed against the public benefits of the proposal. This harm would be clearly and convincingly outweighed by a substantial package of public benefits, including but not limited to:

Regeneration of brownfield land

- The heritage-led regeneration of this highly sustainable underutilised brownfield car park site, to which NPPF paragraph 125(c) attaches **substantial weight,** and sets out that development proposals for which should be approved unless substantial harm is caused;

Housing delivery

- The delivery of 45 new homes on a brownfield site;
- Of which 8 homes (21.31% by habitable room) will be affordable, comprising wholly of London Affordable Rent family sized homes, exceeding the target size mix proportion of 32% set out in draft Local Plan Table 7.1;
- Provision of a mix of sizes and types of homes to meet a broad range of housing needs including 29 (64%) family sized homes (three bedroom homes) in line with draft Local Plan Policy HO1;

- 11% (by unit) will be wheelchair accessible or adaptable;

- 91% will be dual aspect; and

- All will be tenure blind; energy efficient; fire safe; have access to private and communal outdoor amenity space; have access to children's play spaces; meet minimum size standards; receive good levels of daylight/ sunlight; and will provide residents with appropriate privacy.

Quality of Place

- Replacement of a car-centric environment characterised by poor-quality buildings and surface car parking.

- A heritage-led design that provides series of distinctive new buildings that are design complement the character of Blackheath Village and be sympathetic to the character of Blackheath Conservation Area and nearby heritage assets, and which has been subject to extensive design scrutiny.

- 2,247sqm of new public realm within the site which will be accessible to all and designed to be welcoming to all, which will include:

    a range of areas for sitting/relaxing;

    areas for children to play; and

    significant 'greening' including new trees and lawns (complemented by 788 sqm of green roofs), which will contribute to the achievement of a bio-diversity net gain of 113.65%%, an Urban Greening Factor of 0.446, and improvements to local air quality.

- A pedestrian and cyclist favoured environment that provides:

    Car-free development, except for Blue Badge parking spaces and 17 spaces for general needs parking and van parking during market days, secured throu management plans.

- Supporting local events, including the London Marathon stacking, through the provision of extensive public realm.

Local Economy

- Provision of a farmers market on the Site, with space for the market to expand in the future within along high quality and purpose-built public realm, secured through a management plan, supporting the vitality and viability of Blackheath District Centre.

- A further boost to town centre vitality/viability through new flexible commercial spaces.

- Creation of construction stage jobs and operational stage jobs and financial contributions towards local employment which will be secured by S106 obligation.

- Providing local labour opportunities and businesses secured through a Local Labour and Business Strategy.

- Supporting local supply chains through a Local Procurement Plan.

Education

- Flexible space within Block C designed to be utilised for educational purposes, enhancing local educational facilities.

Environmental Sustainability

- Net zero carbon emissions (operational stage), including maximising the provision of renewable energy.

- Biodiversity net gain of 113.65%.

- Achieving a more sustainable pattern of development with less reliance on the car, encouraging active travel modes such as walking and cycling, and the use of public transport.

8.145 The Proposed Development therefore accords with the NPPF, London Plan, Local Plan and draft Local Plan with respect to heritage.

VII. Energy and Sustainability

8.146 London Plan Policy SI2 (Minimising Greenhouse Gas Emissions) sets out an energy hierarchy (be lean, be clean, be green, be seen) which development proposals must comply with. Policy SI2 requires major developments to meet minimum targets for carbon dioxide emission reductions, where a minimum on-site reduction of at least 35% beyond Building Regulations is required. Residential development should achieve 10% and non-residential development should achieve 15% savings, through energy efficiency measures alone. London Plan Policy SI4 (Managing Heat Risk) states that major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy.

8.147 Core Strategy Policy 7 (Climate Change and Adapting to the Effects) Part 1(c) sets out that the Council will achieve a reduction in Lewisham's CO2 emissions by applying the London Plan policies relevant to climate change. Policy 8 (Sustainable Design and Construction and Energy Efficiency) also sets out the Councils commitments to prioritising the reduction of the environmental impact of all new developments , including maximising energy and water systems; as well as integrating renewable energy generation into the design of buildings. Development Management Policy 22 (Sustainable Design and Construction) outlines that the Council will require all developments to maximise the incorporation of design measures to maximise energy efficiency, manage heat gain and deliver cooling.

8.148 Draft Local Plan Policy SD3 (Minimising Greenhouse Gas Emissions) requires development proposals to be designed to reduce greenhouse gas emissions and minimise energy demand in accordance with the London Plan Energy Hierarchy. Policy DS5 (Managing Heat Risk) also sets out that development proposals must be designed to reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the London Plan cooling hierarchy.

8.149 The energy strategy for the Proposed Development follows the energy hierarchy of 'Be Lean, Be Clean, Be Green and Be Seen' as set out in Policy S12 of the London Plan.

8.150 An Energy and Sustainability Statement and Thermal Comfort Report have been prepared by BoxTwenty and submitted alongside this planning application. As set out in the Energy and Sustainability Report, the Proposed Development achieved an overall on-site reduction of 88% in regulated carbon dioxide emissions over Part L 2021, exceeding the GLA minimum target of 35% and the benchmark target of 50%.

8.151 With regard to the ‘Be Lean’ stage of the hierarchy, energy demand has been significantly reduced. The Proposed Development achieves a reduction of 25% in regulated carbon emissions over Part L 2021, exceeding the GLA target of 10%, through passive design and energy efficiency measures.

8.152 With regards to ‘Be Clean’ stage of the hierarchy, there is no proposed District Heating network in the vicinity of the Site, with the nearest proposed network some 1.3km away and the closest existing network just over 1km away.

8.153 In terms of the ‘Be Green’ stage of the hierarchy, an assessment of feasibility of on-site renewable energy has been carried out. The Proposed Development aims to bring forward Air Source Heat Pumps and Photovoltaic panels, contributing to the achievement of a 64% reduction in regulated carbon emissions over Part L 2021 for this stage.

8.154 In total carbon savings of 88% are achieved on-site. The applicant proposes to off-set the remaining carbon emissions to reach net zero carbon through a cash-in-lieu contribution of £18,500 to the London Borough of Lewisham.

8.155 With regard to the cooling hierarchy, as set out in Policy SI4 of the London Plan, the Proposed Development seeks to reduce the amount of heat entering each building through a combination of measures including; orientation of glazing, external shading, optimisation of window g-values, avoid heat distribution in closed corridors, positive ceiling heights and passive and cross ventilation. However, whilst passive measures have been maximised, this is insufficient on its own to address overheating in the DSY1 weather file scenario with windows open due to security and noise constraints and so additional mechanical ventilation with heat recovery are proposed.

8.156 It is therefore considered that the Proposed Development meets London, Local and Draft Local Plan policies in relation to energy and overheating.

VIII. Biodiversity and Urban Greening

Ecology and Biodiversity

8.157 London Plan Policy G6 sets out that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

8.158 Core strategy policy 12 states that development should enhance or preserve the local biodiversity and draft Local Plan Policy GR3 state that development proposals must seek to avoid harm to biodiversity and should seek to secure Biodiversity Net Gain enhancements in line with London Plan policy G6.

8.159 A Biodiversity Net Gain Assessment prepared by Avondale Ecology has been submitted with the planning application. Based on the proposals, the post-development site value will be 1.25 habitat units, a 113.65% gain in habitat units, with 0.38 hedgerow units i.e. a 15.32% gain. This is as a result of creation of living roofs, green walls, garden habitats/planting beds and additional tree planting, including extension of the tree line to the south.

8.160 The BNG Assessment states that if there are potential concerns raised around vegetation on green walls, they may be removed from the calculations. In this eventuality, the site would still achieve 1.17 habitat units i.e. a 100.20% net gain. Given this, the proposed development would be above the 10% statutory requirement.

Urban Greening Factor

8.161 London Plan Policy G5 requires major development to contribute to the greening of London, whereby the Mayor's recommended target Urban Greening Factor (UGF) score is 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses).

8.162 A robust biodiversity strategy has been developed in order to maximise and enhance biodiversity on the Site. This application is supported by an Urban Green Factor Assessment prepared by Avondale Ecology. The report identifies the biodiversity proposals, which includes additional trees, living roofs, green walls and planting.

8.163 The Urban Greening Factor target score of 0.4 is applicable to the application, as it is predominantly residential. The Site achieves a score of 0.465 when including green walls and 0.412 without – both of which exceeds the requirement.

8.164 The development therefore maximises urban greening on-Ste in line with London Plan Policy G5.

IX. Highways and Transport

Access

8.165 The Proposed Development has been designed to support delivery of the strategic target of 80% of all trips in London being made by foot, cycle or public transport set out in London Plan Policy T1, with priority to pedestrians and cyclists which is incorporated into the landscape and public realm strategy.

8.166 The Proposed Development seeks to increase pedestrian permeability within the Site and beyond as the new public realm will create a series of connected spaces where pedestrians and cyclists will be able to travel through the Site.

8.167 As per the existing arrangement, vehicular access to the Site will be provided via Hurren Close. The access will be moved further towards the southwest corner of the Site to align with the proposed mews street.

8.168 No access to the site will be provided from B212 to the east of the site. The existing barrier-controlled access to the station forecourt will be retained and new access control bollards will manage access between the Site and the station forecourt. Only refuse vehicles collecting from the commercial unit in Block A will be permitted to exit the site via these controlled points, as well as emergency service vehicles.

Car Parking

8.169 London Plan Policy T6 states that car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport. London Plan Policy T6.1 states that disabled persons parking should be provided for new residential developments, with one designated disabled persons parking bay per dwelling is available from the outset for 3% of dwellings. Developments should also demonstrate how additional spaces could be provided for a further 7% of dwellings.

8.170 At the local level, both Lewisham Core Strategy Objective 9 and draft Local Plan Policy TR1 suggests that development proposals must make the most effective use of land and optimise the capacity of sites by taking into account connectivity and access to existing and planned future public transport. Policy states that priority should be given to reducing car use and both promoting and enabling movement by walking, cycling and the use of public transport.

8.171 Additionally, draft Local Plan Policy TR4 states that in line with London Plan, car-free development should be the starting point for all development proposals in places that are well-connected by public transport. This policy further states that development proposals must make adequate provision for

residential and non-residential disabled persons parking, recognising that car-free development has no general parking but should still provide disabled persons parking.

8.172 The Site falls within a PTAL rating of 4-5 which is classified as 'good'. Given this, the development is proposed to be car-free with the exception of one accessible parking space to be provided within the southwest corner of the site. One additional accessible parking space will be provided on the southern side of Baizdon Road to provide improved access to the residential entrances in Block C.

8.173 Additionally, 17 car parking spaces, including two accessible spaces, will be re-provided on site for public use, to meet residual demand as identified by the parking surveys. One of the proposed spaces will be assigned to a car club use, as per the existing Zipcar space on site.

8.174 In line with Lewisham Draft Local Plan Policy TR4, the Proposed Development proposals include the provision of a car club space on-street. The detail of this is to be discussed and agreed further with LBH.

8.175 The loss of parking spaces from the existing use have been assessed, surveyed and discussed with Lewisham's Highways officers. Latest surveys undertaken in June 2024 identified maximum parking demand within the station car park at 12:30pm with a total of 55 vehicles and therefore the maximum potential number of vehicles displaced at one time is 38. Analysis demonstrates that other parking opportunities including Blackheath Grove Car Park and on-street pay and display have capacity to accommodate the majority of this parking demand.

8.176 It is understood that the existing demand for the car park is long-stay commuter and employment parking with analysis showing 25 arrivals between 07:00-08:30. The re-provision of 17 parking spaces within the site are likely to be occupied from early in the morning and throughout the day.

8.177 It is understood that the loss of the car park will have an impact on existing users however, it should be noted that the proposed development will mitigate the loss of publicly available car parking through the provision of a secure and covered cycle hub within the site and public realm enhancements, including a new route from Collins Street to increase the permeability of the site improving safety and attractiveness of the site to encourage active modes of travel through. As outlined in Section 2 of this Statement, the Proposed Development seeks to support a shift in travel behaviour away from car dependency, especially given the Sites accessible location. Overall, the emphasis on promoting more sustainable and inclusive patterns of travel, is consistent with both local and London-wide planning policy objectives.

8.178 The full detail of parking surveys and associated analysis has been submitted with the application within the Transport Assessment prepared by SLR Consulting.

Cycle Parking

8.179 Cycle parking will be provided for all uses in line with the standards set out in London Plan Policy T5 which are reiterated in Lewisham core strategy and draft local plan. The required number of spaces being provided within the development across the development are set out within **Table 8.3** below.

Table 8.3: *Cycle Parking Provision (Per Building)*

Building (Use)	Long Stay Spaces	Short Stay Spaces
Block A (Residential)	10	2
Block A (Commercial)	1	14
Block B (Residential)	40 (individual cycle stores for each property)	0
Block C (Residential)	36	2
Block C (Commercial)	4	0
Total	**91**	**18**

8.180 The above cycle parking requirements for Block C commercial units have been established based on an office use. Should the space be used for learning and non-residential institution space. If provided as educational floorspace, this will likely be occupied by the John Ball Primary School and pupils/staff will continue to park bikes within the existing school.

Delivery and Servicing

8.181 London Plan Policy T7 and LBL draft Local Plan Policy TE5 require adequate provision for servicing to be made. A delivery and Servicing Management Plan prepared by SLR Consulting has been submitted as part of the application.

8.182 Residential refuse collection for Block A will take place from the eastern end of Collins Street. Commercial refuse collection for Block A is proposed internal to the Site. Vehicles will enter via Hurren Close and exit via the B212. Automated bollards on the mews street to the south of Block A will restrict access through to the market square and B212 for refuse collection and emergency vehicles only.

8.183 Individual waste collections from the houses in Block B will take place from Collins Street, replicating the arrangement currently in place with the terraced properties on the north side of Collins Street.

8.184 Residential and flexible commercial and non-residential institution refuse collection for Block C is proposed from Baizdon Road where a refuse vehicle can stop within 10m of the bin store.

8.185 Delivery vehicles servicing Block A will enter via Hurren Close, reverse within the turning head between Block A and Block B and exit the site via Hurren Close. Delivery vehicles servicing Block C can wait on the double yellow lines on Baizdon Road for up to 20 minutes when loading/unloading.

8.186 The Site is accessible by vehicles via Hurren Close and also on-street along Collins Street and Baizdon Road to assist with delivery, servicing and waste collection which is considered appropriate and in keeping with regional and local policies.

X. Technical Considerations

a. Fire

8.188 London Plan Policy D12 aims to ensure the highest standards of fire safety are achieved in all development proposals, safeguarding the well-being of building users. The policy emphasises the need to identify unobstructed outside spaces, ensure developments incorporate features that mitigate the risk of fire-related harm, minimise the potential for fire spread, and provide suitable means of escape. It also encourages the development of a robust and adaptable evacuation strategy. Furthermore, for major development proposals, the policy requires the preparation of a fire statement, providing details of the strategies to ensure the safe use of the development.

8.189 Furthermore, London Plan Policy D5 states that all development should be designed to incorporate safe and dignified emergency evacuation for all building users.

8.190 The Lewisham Adopted and Draft Local Plan does not include any specific policies relating to fire safety.

8.191 A Fire Statement, prepared by B-First Fire Safety, accompanies the planning submission and has been prepared in accordance with this requirement. The Fire Statement confirms compliance with London Plan Policy D5 and D12.

8.192 It is considered that adequate measures are provided to meet the functional requirements of the Building Regulations and all the relevant legislation and requirements of London Plan Policies D12 and D5(B5).

b. Flood Risk and Drainage

8.193 NPPF Chapter 14 sets out that inappropriate development in areas at risk of flooding should be avoided. It sets out that applications above one hectare in size should be supported by a site-specific flood risk-assessment that demonstrates that flood risk is not increased elsewhere.

8.194 London Plan Policy SI 12 (Flood Risk Management) states that development proposals should ensure that flood risk is minimised and mitigated. Flood management methods should be employed in development proposals due to their benefits including flood storage and creating recreational areas and habitat.

8.195 Lewisham Core Strategy Policy 10 (Managing and Reducing the Risk of Flood) outlines that development will need to demonstrate that the proposals will deliver a positive reduction in flood risk to the borough, whether that be by reducing the frequency or severity of flooding or by reducing the

impact that flooding may have on the community. Lewisham Draft Local Plan Policy SD7 (Minimising and Managing Flood Risk) also sets out that a Flood Risk Assessment (FRA) will be required for all major development proposals in Flood Zone 1. Draft Policy SD8 (Sustainable Drainage) sets out that development proposals should be designed in accordance with the London Plan drainage hierarchy, achieving greenfield runoff rates and managing surface water as close to its source as possible and that SuDS should be prioritised, integrating green and blue measures where feasible.

8.196 A Flood Risk Assessment and Sustainable Drainage Report has been prepared by Pell Frischmann and submitted alongside this application.

8.197 The FRA states that the site is located within Flood Zone 1 (Low Probability) and is far removed from the extents of Flood Zones 2 & 3, therefore considered to be at low risk of flooding from Main Rivers and the Sea. Local documentation and geology suggest the site is at low risk of groundwater flooding with low/deep groundwater levels. Mapping from the Local SFRA has the site in an area of low risk from groundwater flooding.

8.198 The site is shown to have an associated surface water flood risk, this flood risk is assumed to be associated with an overland flow route with areas of high risk forming where impermeable obstructions are found on site. This flood risk can be mitigated through layout and level considerations; including routing surface water flooding away from proposed buildings and ensuring a suitable freeboard of finished floor level above surrounding ground.

8.199 It should be noted that there are various public combined water sewers running through the site. Most significantly a 1050mm diameter Thames Water asset that runs through the site from east to west joining a 600mm asset and flowing west from the site in a 1200mm asset. These assets will be subject to a diversion within the site boundary and thus the risk of flooding from these assets is deemed to be low as Thames Water must ensure capacity of these assets through their role at Statutory Undertaker.

8.200 Mapping provided by the EA suggests the site falls outside of any modelled flood extents from reservoir flooding and as such is at low risk of flooding from this source.

8.201 The FRA recommends finished floor levels and external level design to manage the residual risk of overland flows by conveying water away from buildings and towards positively drained areas are considered appropriately. In accordance with relevant planning policy, it can be demonstrated that the development could proceed without being subject to significant flood risk and complies with relevant local plan policies.

8.202 The Sustainable Drainage Report states that the existing runoff rate of the existing site is 69.5l/s. As set out within the LBL Drainage Design and Evaluation Guide, an allowable discharge rate equivalent to the greenfield runoff rate should be targeted for all surface water discharging from development sites. The QBAR Greenfield runoff rate value of 2.1l/s for the site is considered too restrictive for any flow control features to be utilised on site.

8.203 The Proposed Development has been designed in accordance with the drainage hierarchy however, while water reuse should be considered through the detailed services design of the site, it does not provide an effective wholesale outfall method. Given the prevailing ground conditions and the lack of surface water bodies or sewers, it is proposed that the combined sewer within the site remains the most appropriate location of outfall.

8.204 As a runoff rate restriction is required, surface water attenuation and blue-green roofs are proposed to balance the excess volume in a safe manner. Sufficient storage is proposed for events up to the 1 in 100-year storm with 40% allowance for climate change.

8.205 The proposed development reduces peak runoff rates from 69.5 l/s to 12 l/s which is the minimum feasible discharge rate for surface water providing an 83% betterment on the existing surface water runoff rate.

8.206 The Proposed Development therefore meets the requirements of the NPPF, London Plan Policies SI 12 and SI 13, Local Plan Policy 10. Whilst the Proposed Development does not wholly comply with draft Local Plan Policy SD8, all measures have been considered to reduce the greenfield runoff rate and when compared to the existing state, the development would represent a significant improvement to drainage in the surrounding area. On balance, it can therefore be considered that the proposed drainage strategy is acceptable.

c. Noise and Vibration

8.207 The London Plan, at Policy D14 (Noise) requires development to reduce, manage and mitigate noise to improve health and quality of life.

8.208 In addition to Policy D14, Policy D13 (Agent of Change) sets out the Agent of Change principle. This places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses of the proposed new noise-sensitive development. Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.

8.209 Lewisham Local Plan DM Policy 26 requires new noise sensitive development to be located away from existing or planned sources of noise pollution.

8.210 The emerging Local Plan further supports the Agent of Change principle, noting that it will be applied in accordance with the London Plan. In addition, emerging Policy QD7 (Amenity and Agent of Change) supports avoiding and minimising the harmful impacts of noise and vibration at all stages the development.

8.211 Given the scheme's proximity to the nearby railway line, a Noise Impact Assessment and a Vibration Assessment have been prepared by Hann Tucker Associates and submitted alongside this application. The Noise Assessment concludes that the impact of noise on the proposed dwellings has been assessed against Building Regulations and national and local planning policies, with appropriate internal noise levels identified as achievable using conventional mitigation measures. Preliminary specifications for the acoustic performance of external building elements have been recommended for planning purposes, with detailed specifications to follow at the design stage. Limits for plant noise emissions and operational noise for amenity and commercial units have also been proposed. Overall, the assessment demonstrates that, with suitable mitigation, the site is appropriate for residential development in terms of noise.

8.212 The Vibration Assessment confirms that a detailed survey has been undertaken to establish existing levels of train-induced vibration. The survey results were used to predict the potential impact of train-induced noise and vibration on the proposed development. The assessment concludes that the predicted vibration levels fall within a category deemed to have a 'low probability of adverse comment' and are therefore considered acceptable. Predicted levels of ground-borne noise are below the generally accepted criteria for residential and retail properties and are likewise considered acceptable. It is therefore considered that the Proposed Development complies with the London Plan, Local Plan and draft Local Plan in relation to noise and vibration.

d. Daylight and Sunlight on Neighbouring Properties

8.213 Policy D6 of the London Plan requires the design of new development to provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space

8.214 The external daylight and sunlight assessment has been set out within the Daylight and Sunlight Report prepared by CHP Surveyors.

8.215 The assessment considers the properties to the north of the site on Collins Street, John Ball Primary School and John Ball Nursery.

5, 6 and 7 Collins Street

8.216 With regard to VSC, assessment confirms that 14 of the 16 windows achieve BRE standards, despite the urban context. The two windows which fail under the BRE guidance, are within a door, located beneath the main front and currently enjoy very limited access to natural light and therefore, any loss will appear as disproportionate.

8.217 With regard to daylight, it should be noted that the existing access to sunlight is restricted for these properties. The results of the analysis, demonstrate that all nine rooms analysed will achieve the annual sunlight numerical targets specified in the BRE guidelines. Given this and despite the urban location and orientation of the properties, they will retain good access to daylight and sunlight.

14-29 Collins Street

8.218 With regard to VSC, 53 windows serving habitable rooms, 36 will achieve the numerical values set out in BRE guidelines. The outcome for the remaining windows the retained VSC is above 25% which, given the current baseline and urban location of the site is considered acceptable with regard to retaining good access to daylight.

8.219 With regard to daylight, an assumption has been made on the internal configuration of the properties. Further to this, of 35 rooms analysed, 30 will achieve target BRE guidelines with the remaining achieving at least 74% of their area in NSL.

8.220 it should be noted that the existing access to sunlight is restricted for these properties. The results of the analysis, demonstrate that all nine rooms analysed will achieve the annual sunlight numerical targets specified in the BRE guidelines. Given this and despite the urban location and orientation of the properties, they will retain good access to daylight and sunlight.

8.221 The results on the analysis demonstrate that these properties will retain good access to daylight and sunlight as a result of the Proposed Development, taking into consideration the urban location and existing baseline.

John Ball Primary School and Nursery

8.222 An assessment has been undertake of both John Ball Primary School and John Ball Nursery which confirms that both the school and the nursery will retain a good access to daylight and sunlight.

8.223 The details of all assessments carried out are presented in the Daylight and Sunlight Report prepared by CHP Surveyors, submitted with this application.

e. Overshadowing

8.224 An analysis has been undertaken of the rear gardens of 5-7 Collins Street and playground to John Ball Primary School, to establish the level of sunlight that will be enjoyed by these areas on 21st March, as recommended within the BRE guidelines

8.225 The assessment confirms that, with the exception of one property, 7 Collins Street, all areas will achieve the relevant targets within BRE guidelines.

8.226 With regards to the rear garden of 7 Collins Street, it should be appreciated that the garden is located to the west of the property and therefore the property itself casts a shadow over its garden for a significant portion of the day. Further to this, the garden enjoys an exceptional level of sunlight for such an urban location due to the undeveloped nature of the application site. The assessment confirms that, should a structure of similar height to No7 Collins Street be erected within the application site, it would have the same effect as the Proposed Development.

8.227 In view of the above, a transient shadow analysis for the 21st March and 21st June in both the existing and proposed scenarios have been carried out which confirms that in June the proposals cast no shadow over the garden of No7.

8.228 Given this, and taking into account the urban location and undeveloped nature of the site, it is considered the results of the analysis demonstrate that the neighbouring amenity space will retain appropriate access to direct sunlight.

8.229 The Daylight and Sunlight Report prepared by CHP Surveyors assesses the Proposed Development, the impacts on existing development and amenity spaces in detail it can be concluded that the Proposed Development is consistent with national, strategic and local planning policy with respect to Daylight, Sunlight and Overshadowing.

f. Trees

8.230 London Plan Policy G7 (Trees and Woodlands) sets out that proposals should ensure that, wherever possible, existing trees of value are retained. It goes on to state that if permission necessitates that the removal of any trees, there should be adequate replacement based on the existing value of the benefits of the trees removed.

8.231 Lewisham Core Strategy Policy 12 (Open space and environmental assets) Part 2(g) outlines the Council's intentions to protects trees, particularly street trees and those with amenity value, whilst seeking to replace trees where loss does occur. Development Management Policy 25 (Landscaping and Trees) similarly sets out the intention for the retention of trees and their replacement.

8.232 Draft Local Plan Policy GR5 (Urban Greening and Trees) Part E also confirms that development proposals should seek to retain existing trees and mitigate for any loss.

8.233 A Preliminary Arboricultural Assessment (PRA) and Arboricultural Impact Assessment (AIA) have been prepared by Middlemarch and submitted alongside this planning application. The PRA sought to provide an assessment of the existing trees on site, categorising them to ensure the retention of the highest quality trees. The AIA then goes on to review the proposed development and any impacts on the existing trees, providing details of the mitigation strategy where required. The AIA sets out that the Proposed Development will ensure the retention and incorporation of the vast majority of trees across the Site alongside new tree planting as part of the wider landscape strategy. However, the Proposed Development will require removal of two individual trees, two groups of trees and two hedgerows, all of which are considered to be of low retention value (Category C). Therefore their removal should be considered acceptable as new tree planting of higher quality trees more suited to the new development will make a lasting contribution to the overall visual quality and canopy coverage of the tree stock across the site.

8.234 It concludes that the proposed development is unlikely to significantly impact the visual amenity of the local area as a result of the proposed tree removal, and that whilst some works are to be undertaken within the RPAs of retained trees, the nature of those works are such that they can be completed without causing significant impact. It is therefore considered that the Proposed Development complies with the London Plan, Local Plan and draft Local Plan in relation to trees.

g. Air Quality

8.235 London Plan Policy SI1 (Improving Air Quality) supports development proposals which do not lead to further deterioration of existing air quality; create new areas that exceed air quality limits or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits; or create unacceptable risk of high level of exposure to poor air quality.

8.236 Lewisham Core Strategy Policy 7 (Climate Change and Adapting to the Effects) supports developments that contribute to reducing the borough's carbon dioxide emissions. Similarly, Development Management Policy 23 (Air Quality) requires major developments to submit an Air Quality Assessment and address potential impacts on air quality. The Draft Local Plan Policy SD6 (Improving Air Quality) reinforces this by requiring all developments to achieve Air Quality Neutral, further promoting the enhancement of air quality within the borough.

8.237 An Air Quality Assessment has been prepared by Delta Simons and submitted alongside this planning application. This includes an Air Quality Neutral Assessment that has been undertaken in accordance

with the requirements of the relevant guidance. The assessment finds that following the implementation of the proposed mitigation measures during the construction phase, the Proposed Development complies with the London Plan, Local Plan and draft Local Plan and will be air quality neutral therefore, there are no air quality constraints considered to restrict planning consent.

h. Contamination

8.238 Lewisham Local Plan Policy DM28 (Contaminated Land) states that land should be fully investigated and remediated to minimise and mitigate any harmful effects to human health and the environment. This is applicable wherever development is proposed on contaminated land, land suspected of being contaminated, or if sensitive uses are proposed. Lewisham Draft Policy SD11 (Ground Conditions) sets out that development proposals must demonstrate that any risk associated with land contamination need to be adequately addressed. The draft Policy goes on to confirm that planning conditions may be used to remedial measures will be implemented prior to occupation.

8.239 A Land Contamination Preliminary Risk Assessment (PRA) has been carried out by Pell Frischmann and submitted alongside this application. The report concludes by recommending a generic quantitative risk assessment (GQRA) is undertaken, including the design and implementation of a site-specific land contamination investigation to gather data for human health and controlled waters risk assessments. It also states that while no specific ground gas sources have been identified within 250m of the site, site investigation is advised to assess the depth of Made Ground, with ground gas monitoring required only if significant depths are found. Additionally, a detailed Unexploded Ordnance (UXO) desk study is necessary to evaluate risks during construction, with its findings incorporated into the site investigation design. The applicant is willing to accept a suitably worded planning condition to implement any remediation strategy required.

8.240 The Proposed Development would therefore meet the requirements of Local Plan Policy DM28 and draft Local Plan Policy SD11.

9. Planning Obligations (Heads of Terms) and Community Infrastructure Levy

9.1 The NPPF (2023) states planning obligations must only be sought where they meet all of the following tests, as set out in Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 (as amended):

a) Necessary to make the development acceptable in planning terms;

b) Directly related to the development; and

c) Fairly and reasonably related in scale and kind to the development.

Heads of Terms

9.2 The following Heads of Terms are proposed based upon the London Plan (2021), Core Strategy (2011), Development Management Local Plan (2014), Lewisham Draft Local Plan and Planning Obligations SPD (2015).

9.3 These, and any further Heads of Terms, will be subject to further discussion with LBL Officers during the application determination period.

Affordable Housing

- 21.3% affordable housing by habitable room
- Early stage review mechanism

Biodiversity Net Gain

- Biodiversity Net Gain Plan
- Implementation Scheme in line with statutory requirements
- Monitoring for 30 years

Transport

- S78 and/or S38 agreements as required to facilitate highways works
- Residential and Commercial Travel Plans, Travel Plan Incentives, and monitoring
- No access of future residents to parking permits
- TfL financial contributions to public transport facilities

Energy

- Carbon Offset Payment
- Be Seen Energy Monitoring

Local Employment

- Local Labour and Business Contribution
- Local Labour and Business Strategy
- Local Procurement Plan

Public Realm

- Maintain accommodation as stacking area for the London Marathon
- Play space short fall contribution
- Public access to the public realm

Cost Recovery

- Monitoring and cost recovery obligations

Community Infrastructure Levy (CIL)

9.4 In addition to S106 planning obligations, the Proposed Development will be subject to both Mayoral CIL and LBL CIL.

9.5 Mayor CIL2 was adopted and came in effect on 1 April 2019. It is charged on all residential, office, retail and hotel developments across London. LBL is located within Band 2. The latest Mayoral Annual CIL Rate Summary (2025) sets out the charging rates for all planning permissions granted in 2025 as £71.09 (indexed from a base rate of £60 at 1st April 2019).

9.6 LBL introduced its own CIL Charging Schedule in 1 April 2015. The relevant rates (2025 CIL Rate Summary) are £70.00 per sqm for residential, £0 per sqm for Use Class B and £80.00 per sqm for all other uses.

10. Summary and Conclusions

10.1 The Proposed Development seeks to bring forward an opportunity to unlock the development potential of the existing Site, under-utilised brownfield, public-owned land, primarily functioning as a car park for Blackheath Station, through sensitive heritage-led and highly sustainable redevelopment in line with NPPF, London Plan and Lewisham Local Plan and draft Local Plan policies for increasing housing supply.

10.2 Planning permission is sought for the following

> *Erection of three buildings, comprising residential (Use Class C3), flexible commercial and learning and non-residential institution space (Use Class E and Use Class F1), the provision of a farmers market and the associated provision of landscaping works, cycle parking, car parking, plant and associated ancillary works.*

10.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless other material consideration indicate otherwise. For the reasons set out in this statement, the Proposed Development generally in accordance the Development Plan affecting the Site when read as a whole. Therefore, in accordance with the presumption in favour of sustainable development set out in paragraph 11 of the NPPF, the Application should be approved without delay.

10.4 The granting of planning permission will enable the aims and objectives of the development plan to be achieved, which will in turn deliver the overarching purpose of the planning system which is to contribute to the achievement of sustainable development.

10.5 The delivery of a new highly sustainable and heritage led redevelopment of a long-underutilised brownfield car park site will generate substantial public benefits, including:

> The development of an important ‘gap’ site, optimising the use of underutilised, brownfield land for residential-led scheme with flexible commercial and non-residential institute space in a highly accessible and sustainable location;
>
> A heritage-led design connecting a modern addition to the immediate area whilst keeping in harmony with the existing streetscape and heritage assets of the surrounding area;
>
> Development of 45 high-quality homes, including a significant proportion of family sized homes of which 11% (by unit) will be wheelchair accessible and 91% will be dual aspect;

A much needed entirely social-rented family sized affordable housing provision in high quality, homes, equating to 21.3% affordable housing by habitable room;

All homes will be tenure blind; energy efficient; fire safe; have access to private and communal outdoor amenity space; have access to children's play spaces; meet minimum size standards; receive good levels of daylight/ sunlight; and will provide residents with appropriate privacy;

A development which enhances the significance of the Conservation Area and surrounding heritage assets;

Delivery of highly sustainable development, featuring homes with Air Source Heat Pumps (ASHPs), photovoltaic panels, energy-efficient lighting, and mechanical ventilation with heat recovery, all contributing to a well-insulated, airtight thermal envelope exceeding Part L 2021 standards;

Replacement of a car-centric environment characterised by poor-quality buildings and surface car parking;

Delivery of a new public square, providing a farmers market and offering safe pedestrian routes to and from school, on-site play space, new street trees and planting to boost local biodiversity;

The creation of new local employment opportunities delivered through both the construction phase and in the proposed commercial floorspace during the operational phases of the development;

Significant enhancement of urban greening, with proposals achieving 0.465 Urban Greening Factor score and delivering a 113.65% increase in Biodiversity Net Gain, substantially exceeding the 10% statutory requirement;

The creation of attractive place to live, work and play, with a focus on positive place-making and integrating landscape design at the heart of the scheme;

Provision of a new pedestrian, safe route to school;

A boost to town centre vitality and viability through new flexible commercial spaces;

Creation of construction stage jobs and operational stage jobs and financial contributions towards local employment which will be secured by S106 obligation;

Supporting local events, including the London Marathon stacking, through the provision of extensive public realm; and

A socially, environmentally and economically sustainable development that supports both residents and the natural environment.

11. Appendices

APPENDIX I

Application Submission Documents and Drawings

Application Documents	
Document Title	**Prepared By**
Application Forms and Certificates	Avison Young
CIL Form	Avison Young
Planning Statement	Avison Young
Design and Access Statement (including Designing Out Crime Statement, Landscaping Plan and UGF Statement)	John Pardey Architects and Matthew Wigan Associates
Market Management Plan	Acorn Property Group
Schedule of Accommodation	John Pardey Architects
Air Quality Assessment	Delta Simons
Construction Logistics and Environment Management Plan	SLR Consulting
Outline Site Waste Management Plan	SLR Consulting
Daylight and Sunlight Report	CHP Surveyors
Delivery and Servicing Management Plan	SLR Consulting
Ecological Assessment and Surveys (including Biodiversity Net Gain Report and Calculations)	Avondale Ecology
Energy and Sustainability Statement	Box Twenty
Thermal Comfort Report	Box Twenty
Fire Statement	BFirst Fire Safety
Flood Risk Assessment	Pell Frischmann
Sustainable Drainage Report	Pell Frischmann
Heritage, Townscape and Visual Impacts Assessment	Montagu Evans
Noise Impact Assessment	Hann Tucker Associates
Vibration Assessment Report	Hann Tucker Associates
Car Park Management Plan	SLR Consulting
Preliminary Risk Assessment (Land Contamination Risk Assessment)	Pell Frischmann
Statement of Community Involvement	Kanda Consulting
Transport Assessment	SLR Consulting
Travel Plan	SLR Consulting
Arboricultural Impact Assessment	Middlemarch
Preliminary Arboricultural Assessment	Middlemarch
Viability Assessment	Turner Morum

Planning Drawings	
Title	**Reference**
Site Location Plan	2209-100
Aerial Location Plan	2209-101
Existing Block Plan	2209-150
Proposed Block Plan	2209-155

Existing Street Elevations	2209-160
Proposed Street Elevations	2209-165
Site Survey	2209-170
Proposed Site Plan – Ground	2209-200
Proposed Site Plan – First	2209-201
Proposed Site Plan – Second	2209-202
Proposed Site Plan – Third	2209-203
Proposed Site Plan – Fourth	2209-204
Proposed Site Plan – Roof	2209-205
Bay Studies 1	2209-500
Bay Studies 2	2209-501
Block A Proposed Floor Plans	2209-A-300
Block A Proposed Elevations	2209-A-400
Block B Proposed Floor Plans	2209-B-300
Block B Proposed Elevations	2209-B-400
Block C Proposed Floor Plans	2209-C-300
Block C Proposed Elevations	2209-C-400

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