

BLACKHEATH STATION CAR PARK

OBJECTION TO PARKING LOSS, DECEMBER 2025

1.0 BACKGROUND

- 1.1 Planning application DC/25/139604 has been submitted for the redevelopment of a 162 space car park adjacent to Blackheath railway station for 45 residential dwellings, a small commercial unit, plus 18 car parking spaces, 17 public and one disabled bay allocated to a residential property. A net reduction in 145 public parking spaces.
- 1.2 Blackheath Society is concerned about the impact of the loss of public car parking on Blackheath Village. PEP was commissioned by the Blackheath Society to review the submitted documentation to confirm whether the concerns warrant an Objection. PEP concluded that there was a concern about the impact of the loss public car parking and provided an Objection Note dated September 2025 which was submitted by The Society in their consultation response on the application.
- 1.3 Since the Objection Note was submitted SLR, the Applicants transport consultants, have provided a response to the objection, dated 28th October 2025. PEP have reviewed this response and set out the following considerations/concerns that still arise as a result of the proposals:
 - Impact on Blackheath Village users;
 - Primary school operation and lack of firm commitment for change;
 - Impact on disabled users;
 - Lack of consideration for visitors; and
 - Lack of consideration for deliveries.
- 1.4 Blackheath Society have also commissioned independent parking surveys of the local area and this note assesses the results of these surveys.

2.0 FURTHER APPRAISAL

2.1 Overall Impact on Existing Parking Demand

- 2.1.1 The SLR approach continues to fail to provide the full picture of displaced vehicles. The response suggests that those currently parking in the car park and not able to in the future would not park elsewhere locally and/or either change travel mode or not travel to the area in any event and park at a different station. Their assessment still confirms that there is a shortfall of parking and this ultimately will affect the operation and sustainability of the Village shops and facilities.

2.1.2 PEP confirm that the mitigation measures proposed do not address the loss of parking, and as some measures are not able to be secured as part of the application in any event, cannot be relied upon.

2.1.3 We have considered the impact on each individual car park user in the following sections.

2.2 Impact on Commuters

2.2.1 The SLR report on a number of occasions notes that commuters are likely to either change travel mode to reach the station or drive to alternative stations for their onward train travel. SLR also state that the Eltham station car park is cheaper than at Blackheath Grove, and so commuters are unlikely to transfer to this car park. However, it must be noted Eltham station car park is also cheaper than the Blackheath station car park. The current daily charge at Blackheath station is £21.50 for 24 hours, and £16 for 12 hours, and rail commuters are still choosing to park in the Blackheath station car park at present.

2.2.2 The cost of a peak time return train ticket to central London is more expensive from Eltham at £10.60 compared to £9.20 from Blackheath so this is not a factor. There are seven trains to central London between 07.00-08.00 and eight between 08.00-09.00, this is in comparison to Blackheath which has nine and 10 respectively.

2.2.3 Eltham station is in a different Borough and around 2.5 miles from Blackheath and it is served by same and one different route. It is unclear why commuters would transfer to another station. There are likely to be other reasons why commuters choose to park at Blackheath rather than at Eltham at present and there is no reason to suggest this would not continue as parking charge is not a factor.

2.3 Impact on Blackheath Village Users

2.3.1 By SLR stating for commuters that existing car park users would either change travel mode or park at another station suggests SLR anticipate that those using the car park to visit local facilities in the Village will also just choose to park elsewhere at other nearby local centres and not visit Blackheath.

2.3.2 The loss of parking would have a greater detrimental impact on these users compared to others using the car park. Across the day on the day of the SLR survey 71 cars parked had a destination of Blackheath Village.

2.3.3 As stated in our previous response of the 55 cars currently parked at the peak time of 12.30 lunchtime, SLR have noted 17 would still be able to park on site (assuming two of these users were making use of the public disabled bays). A detailed review of the split of the destination from these vehicles identifies of the first 17 cars to park in the morning on the day of the SLR survey, and still be on site at lunchtime:

- 41% went to the station;
- 29% Baizdon Road and likely the school:
- 23% to the Village: and
- 7% parked all day destination unknown.

2.3.4 It is assumed these are all commuters either to the station, school or Village and therefore as they still would be able to park in the station car park they would do so. This leaves a shortfall of 38 spaces at the peak lunchtime period assuming the new station car park is not available as only used by commuters. At this time of the remaining 38 cars, 24 (63%) are for the Village. This confirms that users of the car park to visit the Village would be disproportionately impacted by the reduction in parking at the station car park.

2.3.5 The SLR parking survey identified availability of five on street or Grove parking spaces at the peak lunchtime period. On site observations have identified that this is typical of the area. Therefore, other parking opportunities locally are already at capacity.

2.3.6 If displaced commuters choose to park elsewhere in Blackheath then this would adversely affect the ability of the on street and off street parking to accommodate visitors and shoppers to the detriment of the facilities in the Village.

2.4 Impact on Primary School Operation

2.4.1 John Ball Primary School is adjacent to the site. It is agreed by all that there is a parking demand for the adjacent school in the Blackheath station car park.

2.4.2 PEP identified in the previous note that based on the SLR work the percentage of school parent arrivals by car and using the car park is already low, at around 3% of pupils, with around 20 vehicles in the morning and the same in the afternoon. These trips therefore may relate to travelling or learning difficulties the carers or children may have and travelling by other means is not feasible. This should be reviewed by SLR with the school.

2.4.3 It is unlikely that this level of car use to the school at drop off and pick up time could be reduced or removed.

- 2.4.4 In the latest SLR response it is noted that there is *'mutual agreement between the Applicant and the Headteacher that this is not desirable given the potential negative impact on pedestrian safety and air pollution so close to the school.'* No evidence or exchange of correspondence has been put forward to confirm this. Similarly there is no evidence of consultation with those parents and any staff who currently park in the car park and whether they could use alternative transport options to reach the school site. On this basis it should therefore be assumed that this parking is required.
- 2.4.5 Baizdon Road and Hurren Close to the west of the car park are closed at school start and finish times as part of Lewisham's School Streets Programme. Therefore, those that do drive are directed into the station car park. Given that this is closest area for parent to park and that other parking is remote from the school and is used by town centre users and other school parents this may not be an option in event. Because of the Equality impact and potential impact on children this should be reviewed properly.
- 2.4.6 From the SLR parking survey it is also noted that around five long stay cars parked in the station car park are staff at John Ball Primary School, arriving first thing in the morning. Given that these vehicles also arrive early they may still also be able to park in the station car park, reducing capacity for other users. A further eight cars were recorded staying a few hours during the day with a destination of Baizdon Road. Therefore, it is suggested the station car park is used for school staff and visitors. It is not proposed that staff would not be permitted to park in the car park going forward and it would be difficult to enforce this in any event.
- 2.4.7 If parents still choose to drop off/pick up by car the loss of a safe area to do so would result in a road safety issue on Baizdon Road and/or within the new development.
- 2.4.8 The SLR report again notes that the Applicant has offered to fund and produce a School Travel Plan. It is difficult to see how effective this could be if only around 3% of parents drive, however it is clear that staff park in the station car park. The lack of Travel Plan progression indicates that there is not the agreement suggested thus there remains no commitment in place. This reduction in parking demand therefore cannot be relied on.
- 2.4.9 If the school is in agreement with the proposal the applicant should provide the Travel Plan at this stage, including undertaking travel surveys with parents and staff to demonstrate how the school could reduce the already low car travel.

2.5 Impact on Disabled Car Park Users

- 2.5.1 PEP has raised the issue with the disabled parking provision on and off site.
- 2.5.2 There remains no evidence put forward by the applicant that the provision of two public disabled parking bays for the existing users is sufficient to meet the current disabled parking demand. Parking elsewhere in the car park, whilst not in marked disabled bays could also be being used by those with a need to drive to the school.
- 2.5.3 It has however now been accepted by SLR that there could be temporary impacts on disabled users wanting to park and use the station during the construction phase of development. Reference is made to the two disabled bays on Blackheath Grove that are outside the Post Office. You can also park in the Blackheath Grove car park for free with a disabled badge. However, the majority of spaces are not suitable for disabled use with no safety or access margins. For disabled drivers the use of Blackheath Grove is likely to be too far and requires walking/wheeling up a slope. For those able to walk or wheel then parking in these locations would displace other drivers currently using those spaces. This would especially detrimental to those using the spaces to access the adjacent Post Office. This is considered further in Section 3 when discussing new parking surveys.
- 2.5.4 Reference is also made to provision of disabled spaces at Eltham station car park in the SLR response. However, no evidence has been put forward as to whether there is any capacity at these spaces.
- 2.5.5 The current disabled spaces in the station car park are also adjacent to the platform entrance and the Village centre therefore can also be used for disabled passengers or Village centre shoppers being dropped off. This would not be the case in the future.
- 2.5.6 The impact on disabled drivers and the ability for disabled train passengers to use the station continues to not be appropriately assessed. This remains an issue and contrary to the Department for Transport Inclusive Mobility guidance, December 2021.
- 2.5.7 In addition, the location of one of the new disabled bays for residents proposed on-street on Baizdon Road is an issue. Firstly, as previously noted this could be used by any disabled user and therefore may not be available for the new resident the space is proposed to serve given the limited alternative disabled parking options locally. Secondly whilst the swept path analysis at Appendix E of the SLR Transport Statement notes refuse and delivery vehicles could pass the proposed on-street space, the manoeuvre is shown as extremely tight and would result in vehicle conflict.

2.6 Consideration for Visitors to the Site

- 2.6.1 The SLR response note that visitors are not expected to drive. However, with commercial/café units proposed have disabled staff/visitors been considered for these units.
- 2.6.2 Given that there is some on street and off street parking in Blackheath Village some visitors would arrive by car. These visitors would be competing with existing displaced car drivers to find parking spaces locally. Therefore, there would be an increased parking demand in the future resulting from the new development as all uses on the site are likely to generate additional visitors to the area.
- 2.6.3 Based on Policy visitors could not be prevented from parking in the Village and impacting on the existing demand.

2.7 Consideration for Servicing/Delivery

- 2.7.1 The London Plan states that development should *'take into account the varied operational and servicing requirements of different business uses'* (paragraph 6.2.2). The Lewisham Local Plan policy TR5 reiterates that adequate space for deliveries should be accommodated off-street. SLR has confirmed that servicing vehicles were considered in the Delivery and Servicing Management Plan.
- 2.7.2 In the proposals there are only limited locations that vehicles are able to pull in and service, and these are also the only locations where vehicles on site are able to pass. The vehicle trip rates included in the SLR response note are also lower than identified in the TRICS data at Appendix I of the SLR Transport Statement, March 2025, from which it notes the data was derived. Therefore the assessment both underestimates the potential vehicle conflict and demand for space on the site.
- 2.7.3 Considering the apartments, for the 45 dwellings only five deliveries are anticipated per day as set out in the table 4-2 of the Delivery and Servicing Management Plan, March 2025. This increases to a potential nine deliveries per day when reviewing the raw TRICS data. The TRICS review however included four apartment sites, with only one survey since the Covid-19 pandemic. Since this time there has been a significant rise in supermarket deliveries, couriers for example Amazon, DPD, EVRi etc, and food deliveries for example Deliveroo, UberEATS etc. Therefore, the figures being considered significantly underestimate the likely number of delivery vehicle arrivals.
- 2.7.4 The level of deliveries has not been adequately considered, whilst the time spent on site is low, the higher visitation of these vehicles would result in parking demand outside designated areas and result in general and emergency service vehicle access concerns, and road safety issues. The scheme therefore does not allow for adequate deliveries.

3.0 PARKING SURVEYS

3.1 Applicant Parking Surveys

- 3.1.1 Whilst it is agreed that traffic surveys at a neutral time of year should be generally undertaken. A car park is different and you consider a range of times because of the different functions of the car park including use by commuters, the school, and those visiting the Village. This varies across a year. Given that the applicants are seeking planning consent for the site they should demonstrate the suitability of the provision for all users. It is not down to objectors to undertake the work for the developer.
- 3.1.2 Given that the applicant has surveys going back a number of years this information should be provided. In London that there is also a well-accepted methodology produced by Lambeth which is used across the Boroughs. This for commercial and residential schemes would include day time/overnight and at the weekend. The applicant has failed to do this.

3.2 Blackheath Society Parking Surveys

- 3.2.1 Blackheath Society have therefore commissioned parking surveys for Tuesday 9th December 2025 using the same parking survey parameters as the applicant in order to compare weekday demand at differing times of year.
- 3.2.2 A comparison of the parking survey results is set out below.

Blackheath Station Car Park

- 3.2.3 A total of 181 cars were recorded parked at the Blackheath station car park across the day on the 9th December 2025, this is in comparison to 171 in June 2024 and therefore broadly similar. A comparison of the use of the Blackheath station car park across the day in the summer and winter period is also set out below, again showing similar results:

User	Total % Cars Parked Daily	
	June 2024 Survey	Dec 2025 Survey
Station	22%	17%
Village	41%	38%
Baizdon Road	33%	29.5%
Waiting in car park	1%	2%
Xmas tree purchase	-	7%
Other	3%	6.5%

- 3.2.4 The survey therefore reemphasises the importance of the parking for a range of uses locally and not just as station car park, and with the highest proportion of users visiting the Village.

- 3.2.5 The December 2025 survey recorded a peak car parking demand at 13.00 with 56 cars parked, so again similar to the 12.30 peak time and demand of 55 spaces noted in the June 2024 survey. However, at the peak time it is noted that the proportion of vehicles parked has varied across the times of year:

User	% Cars Parked at peak lunchtime period	
	June 2024 Survey	Dec 2025 Survey
Station	34.6%	23.2%
Village	50.9%	51.8%
Baizdon Road	12.7%	21.4%
Other	1.8%	3.6%

- 3.2.6 In comparison with the SLR survey review, assuming that the first 17 cars parked and still on site at lunchtime could continue to park in the future, a total of 39 cars would be displaced, of which 26 cars, equating to 67% of the displaced cars, would have been visiting the Village. This continues to emphasise the disproportionate impact on users of the Village as a result of the loss of the station car park.
- 3.2.7 The December 2025 parking survey however also identifies a greater proportion of long stay parking associated with trips to Baizdon Road. Whilst there may be other uses on Baizdon Road it is most likely that the majority of these vehicle occupants are going to the John Ball Primary School. Therefore, despite the applicants continued comments about the commitment of the school to Travel Planning measures and reducing car parking demand, the level of usage of the station car park for the school may now be higher than in previous surveys. This does not suggest that the school are committed to reducing car travel further.
- 3.2.8 The December parking survey confirmed that the station car park continues to be used by parents dropping off and picking up from John Ball Primary School, with comparable usage to the June 2024 survey identified. The survey results therefore suggest that the school have either not made any inroads in to reducing their need for parent parking or that the car park is being used by those who are not able to travel by alternative modes. As previously stated there is no reason as to why the proposed Travel Planning measures be implemented at this time.

Blackheath Village On-street Parking

- 3.2.9 The previous survey identified that there were approximately 85 on-street parking spaces within the survey area. PEP have surveyed the same area to compare like for like. The December 2025 survey identified 78 spaces. It is appreciated that parallel on-street parking availability can depend on how cars are parked however it is likely that loading bays were also included in the June 2024 survey as well.

- 3.2.10 Based on the raw parking survey data for June 2024 a maximum of 77 cars were parked on street at 13.00. This is in comparison to a maximum of 74 cars parked at 12.30 in December 2025, with only four available spaces. The results of both surveys identify that the on-street parking around Blackheath Village is likely to be at capacity on most days. Therefore on-street parking availability would not be available for displaced vehicles.

Blackheath Grove Car Park

- 3.2.11 The results of the Blackheath Grove car parking survey are also comparable to those undertaken in June 2024 identifying that only two standard parking bays were available at the peak lunchtime period. Again the December 2025 survey confirms this car park can therefore not be relied upon for displaced vehicles, without impacting on those already making use of this car park.

Disabled Parking

- 3.2.12 PEP have raised concerns with regards the discrimination against those using the disabled bays at the station. The SLR response suggests disabled drivers would be able to park on street on Blackheath Grove or at the Blackheath Grove car park. The parking surveys undertaken in December 2025 have confirmed that the two on-street disabled bays on Blackheath Grove are already well used, with one space in use on and off during much of the day, and both spaces in use between 12.00-15.00. Of the four disabled bays in the Blackheath Grove car park all were occupied for the majority of the day, with only one space available on occasion. If displaced disabled commuters were to use these spaces this would mean the displacement of existing disabled users. This is especially of concern with regards the disabled parking bays on Blackheath Grove as these are outside of a Post Office. Therefore the use of these spaces for long term parking would have a negative impact on disabled users accessing Post Office services.
- 3.2.13 It has also been observed that disabled bays at the station are used for short term parking. This use has not been allowed for in the proposals and therefore it is not just about parking but drop off/pick up for those unable to travel to the station by other means.

Parking Along Montpellier Vale

- 3.2.14 We understand that it has been suggested that the location for the Sunday farmers market during the construction phase of the development could be to make use of the perpendicular and parallel parking spaces on Montpellier Vale. On Sunday 14th December 2025 the Blackheath Society therefore undertook a snapshot survey of the car parking usage of this parking area. A total of 22 parking spaces are provided in this area, of which one is a disabled bay. Hourly snap shot surveys from 10.00-14.00 identified all spaces were occupied throughout the period. Vehicles were also observed waiting to occupy spaces as they became available. In addition it was observed that nearby streets were also at capacity during this time. A photo taken during the survey is shown below:



- 3.2.15 The snap shot surveys further highlights the concern that displacement of uses within the station car park would have a significant knock on impact on the operation of the Village. The loss of a further 22 car parking spaces, which are used to capacity on a Sunday, would mean even greater displacement of visitors to the Village. Lack of available parking to the extent proposed could in turn deter visitors to both Blackheath and the market.
- 3.2.16 It would be normal practice as part of the Lambeth parking methodology to undertake parking surveys at different times including a weekend, even for temporary displacement of parking. The developer should be asked to provide surveys at this time to demonstrate the suitability of the redevelopment both during construction and in the long term.

4.0 CONCLUSION

- 4.1 The SLR assessment continues to rely on the feedback from London Borough of Lewisham officers to reduce parking on the site, rather than consider the wider implications. It is unclear why the developer has not provided the earlier surveys. In any event surveys should be undertaken in line with the Lambeth methodology and include the weekend when the Sunday market operates.
- 4.2 The SLR response confirms there would be insufficient parking provision for the Village as a whole between 10.30 and 16.00. It would be short stay visitors to the Village who would be most disproportionately impacted by the loss of parking spaces at the Blackheath station car park, with limited available car parking available locally beyond the station car park. The Blackheath Society independent surveys confirm the developer survey results, the shortfall and lack of capacity.
- 4.3 The December 2025 parking surveys identify a higher proportion of users of the Village would be impacted at certain times of year than originally identified by the June parking surveys.
- 4.4 There would be a material impact on disabled users and other users of the station referenced by the Equality Act, in both the construction period and once the development has been completed. This still has not been fully considered.
- 4.5 It is stated that visitors to the residential scheme would all travel by alternative means. This cannot be guaranteed. Therefore, the impact of visitors especially to commercial uses has not been considered, further increasing future parking demand on local on street parking spaces and Blackheath Grove car park.
- 4.6 The traffic impact or parking for adhoc deliveries by smaller delivery vehicles has not been accurately assessed and these type of trip has increased significantly since the pandemic. This means that delivery vehicles will park inappropriate locations leading to potential road safety issues and issues for access for emergency services.
- 4.7 Based on our review there are issues with the scope of assessment undertaken. The assessment carried out to date has confirmed that there would be an impact on those travelling to Blackheath by car. This is confirmed by the Blackheath Society independent surveys. Therefore, it is unclear how London Borough of Lewisham can determine the application without a full and thorough assessment.