

Alfie Williams  
Principle Planning Officer  
Lewisham Council  
Laurence House  
1 Catford Road  
London  
SE6 4RU

Our Ref: 2506.1748

Your Ref: DC/25/139604

23 December 2025

Dear Alfie,

**Heritage Response Letter regarding Planning Application DC/25/139604 | Reconsultation for design changes and technical responses to representations received as part of the initial consultation.** The design changes include a redesign of the top storey and lift overrun for Block A and associated amendments to the layouts, amendments to the rear elevation of Block B and layout clarifications for Block C. The technical responses include reports and drawings addressing heritage, flood risk (including a sequential test), daylight and sunlight, privacy, BNG and UGF, transport and parking, urban design, sustainability, the Farmers' Market and other planning matters including a Health Impact Assessment. Construction of three buildings ranging between 3 - 5 storeys, comprising 45 residential units (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 landscaping works including public square, cycle parking, car parking, plant and associated ancillary works at Car Park, Blackheath Station, Blackheath Village SE3.

CAR PARK, BLACKHEATH STATION, BLACKHEATH VILLAGE, LONDON, SE3 9LE

#### Context

I have been instructed on behalf of our client, a local community group, to produce a response letter with regards to heritage matters and continued objection to the above application.

This letter follows an earlier Objection Heritage Statement (OHS) and cover letter, dated 30<sup>th</sup> June 2025, that was confirmed as received by yourself (Alfie Williams) on 2<sup>nd</sup> July 2025. It is understood that the OHS and the points it raised were consulted and used in a public meeting held on 3<sup>rd</sup> July 2025. Following this, various response letters, document addendums, and design amendments were also produced by the applicant and their consultants, such as the 'Response to Heritage Objection' by Montagu Evans dated 6<sup>th</sup> August 2025.

The initial conservation officer response by Joanna Ecclestone was dated 2<sup>nd</sup> May 2025 (prior to the OHS), since which time a further four revised comments have been provided (9<sup>th</sup> July, 29<sup>th</sup> August, 7<sup>th</sup> November, 11<sup>th</sup> December 2025), each responding to further information and/or design changes made.

Whilst we appreciate efforts to amend the design, it is considered that the changes have been limited and ineffective and do not address or overcome the serious concerns raised regarding potential harm to the historic environment of Blackheath which would result from the proposed development. For further details and assessment, we request that the OHS be read in conjunction with this letter, as the matters raised within it continue to be relevant.

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### Rebuttal

First and foremost, we maintain our position that the proposed development would be inappropriate and detrimental to the historic environment of Blackheath, harming a multitude of heritage assets and their settings, such as Blackheath Conservation Area, the listed train station, and the numerous other listed and locally listed buildings in the vicinity. The design of the three large blocks of development appears overly dominant and of a generic, modern character which has no sense of place and detracts from Blackheath's historic, village-like character.

This negative impact is compounded by the fact that the proposed development is located adjacent to the train station - a key entry point into the area - and as such would fundamentally alter, dominate, and block the attractive views on arrival which make Blackheath recognisable and unique.

The height and length of the proposed development, particularly Blocks A and B, which are four storeys and three storeys plus roof terrace respectively, appear overly dominant and do not respect the established 'stepped' roofscape created by the historic development on the ascending hillside to the north. This effect is demonstrated by many of the CGIs uploaded to the planning portal, including 'Block A Market View', 'View N From S Platform', 'View NE Between Block B-C', and 'Roof Terrace Views 1 and 2', all of which show the development to have an overbearing presence relative to Collins Street – an important positive contributor to the character and appearance of the conservation area.

The close proximity of the proposed development to the station platform – noting also that the station is a listed building – means that even at three storeys (plus roof terrace), Block B has a looming effect and entirely screens the historic environment located beyond. We do not share the opinion presented by supporting document and acknowledged to some extent by the conservation officer that the trees lining the station platform provide screening as this is negligible and seasonal at best with development (existing or proposed) still readily visible from many points and at any time.

It is interesting to note that the CGI images produced are based primarily upon views from the south platform. As this is the platform on the opposing side of the tracks to the proposed development, the overbearing impact described above would be even greater when viewed from the north platform due to the closer position and steeper viewing angle.

With regards to the gaps between the proposed blocks and the height of Block B, we disagree with the following conservation officer's Rev 4 comment:

*Rev 4: New CGIs have been provided which illustrate the effect of the development on these views, and the new framed views through the gaps between C&B to the west and B&A to the east. These confirm that the view will be substantially altered as one arrives by train. In considering whether reducing the height of Block B would avoid or minimise the harm, I conclude this is not a realistic option as development above a single storey would likely result in this view being obscured. However, the new framed views do create attractive opportunities to appreciate the historic pattern of development on Collins Street and Southvale Road as its steps up the hill and I consider that this is a mitigation of the impact.*

Whilst we are glad to see that the officer has acknowledged that “*the view will be substantially altered as one arrives by train*”, we do not agree that the framed views allow for adequate appreciation of the historic pattern of development, as this is of key importance to the significance, character, and appearance, and ability to appreciate the conservation area. As these views are of such importance and would be so greatly restricted (if not entirely blocked) by the proposed development, we absolutely disagree that the limited gaps equate to mitigation of impact.

It is unclear what point the conservation officer is making with regards to their consideration of a reduction in scale of Block B and conclusion that anything above a single storey would not be a realistic option due to unavoidable impact – this reads as though the officer therefore sees the three storeys plus roof terrace as somehow unchangeable, when in reality it highlights that the development is simply not appropriate for the site and setting.

In a similar point to the above, the redesign of the top floor of Block A results in no real change to its negative impact, especially the most pressing concern of how it would be an overbearing and incongruous presence in the immediate setting of the listed train station and character areas 9 and 9a of Blackheath Conservation Area.

Continued concern is also raised with regards to the fact that the materiality of the proposed development does not match the material palette established by the historic environment of Blackheath. For example, the proposed use of grey and off-white tone brick and bronze metal cladding as shown in the DAS (October 2025) and CGIs will appear cold and incongruous compared to the traditional use of yellow London stock with red brick and/or stucco detailing in the area. As discussed at length in previous objection documents, this and the overbearing scale of the proposed development casts considerable doubt on the supposed ‘heritage-led’ design process.

Similarly, an earlier conservation officer’s comment is also disputed:

*Rev 2 - With reference to the applicant’s attribution of the site to character area 8 rather than 9, I consider that the development has clearly taken its design cue for blocks A and B from the immediate character area 9 and 9a context – being the station buildings, houses and terraces on Tranquil Vale and to the north in Collins Street. In this way their attribution of the site to character area 8 has not impacted inappropriately on the design approach for these two blocks.*

For the aforementioned reasons, the links between the proposed development and the historic development within character areas 9 and 9a are highly tenuous, differing in scale, architectural style, form, and materials, resulting in an incongruous appearance. The south elevation of Block B is considered particularly poor and unsympathetic as it has a highly modern character which neither reflects nor harmonises with the historic terrace on Collins Street that defines the existing northward views from the station and car park.

In their final comment (Rev 4), the conservation officer concludes that “there remains a low degree of harm to the CA, which is regrettable” – this is a great understatement given the fundamental change to the character, appearance, and views through Blackheath. In this regard, the officer’s summary of a “low degree of harm (less than substantial) to the character and appearance of the BCA” falls well short of the major level of negative impact calculated from a high level of change to assets of high importance.

Furthermore, there is no comment upon the high level of cumulative harm when accounting for the settings of the numerous other listed and locally listed buildings in the area, including the listed train station itself.

In summary, the proposal fails to preserve the aforementioned heritage assets and their settings as required by Section 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the heritage policies of the NPPF, London Plan, and local plan.

Where development would result in harm to a designate heritage asset or its setting, paragraphs 212-215 of the NPPF require that this be weighed against the public benefits of the proposal, which can include optimum viable use of an asset. Whilst it is acknowledged that creation of housing is a public benefit, it is argued that this is insufficient when compared to the high level of harm to multiple heritage assets. Moreover, whilst not strictly heritage matters, the impact to the popular market currently held at the site (which many fear would not be able to return) and loss of parking facilities are considered by many at the local community group to not be in the interests of the area and therefore not consistent with the optimum viable use of the application site/Blackheath Conservation.

We hope that the above comments have provided further clarity on the matter. For these reasons, we therefore request that the planning application be refused.

Yours sincerely,



**Shaun Moger** MSc Historic Building Cons.  
Senior Heritage Consultant