

BLACKHEATH STATION CAR PARK

OBJECTION TO PARKING LOSS, SEPTEMBER 2025

1.0 BACKGROUND

- 1.1 Planning application DC/25/139604 has been submitted for the redevelopment of an 162 space car park adjacent to Blackheath railway station for 44 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 The railway station is to the southeast of the car park, Blackheath Village immediately to the northeast, and residential development and John Ball Primary School to the northwest. Users of the car park primarily travel to these destinations.
- 1.3 Blackheath Society is concerned about the impact of the loss of public car parking on Blackheath Village. PEP has been commissioned by the Blackheath Society to review the submitted documentation to confirm whether the concerns warrant an Objection.
- 1.4 Based on the Transport Statement, March 2025, prepared by SLR it has been identified that with the loss of the Blackheath Station car park for most of the day there would be insufficient space on street or elsewhere for the current parking needs of local people. Based on the review the impact on the loss of this public car parking has not been fully assessed and there are issues as to the wider impact of this loss and the impact on the Village. This Objection sets out the issues.

2.0 APPLICATION SUBMISSION

Loss of Parking Proposed

- 2.1 A net loss of 145 public car parking spaces has been identified. However, the full implication of this loss has not been considered by SLR.
- 2.2 Policy T6.1 of the London Plan, 2021 states that 3% of dwellings should have a disabled bay. However, the policy goes on to note that it should be demonstrated how an additional 7% of dwellings could be provided with a disabled parking bay if required, thus providing up to 10% dwellings with a disabled bay. For the site this equates to:
 - 1.35 spaces initially provided, so rounded up to two – currently only one space is provided on site the other being on street so could be used by the general public;
 - Total five disabled bays could be required to be provided, subject to demand. The applicant has suggested that proposed public parking spaces could be converted.

- 2.3 Therefore, after allowing for the potential of 10% disabled parking provision for residents, this would result in only 13 public parking spaces remaining on site. A net loss of 149 public parking spaces. This is the level of loss of parking which should have been addressed.

Mitigation Measures Proposed

- 2.4 PEP has identified 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.
- 2.5 A Car Park Management Plan with options is proposed, however the measures at this stage have not been confirmed. The draft document submitted with the application gives options of permit parking and Pay & Display (P&D) parking. Both options are being considered. However, it is noted the charging structure would aim to deter short stay visitors. Therefore, all Village users of the car park are likely to be displaced because of the existing commuter use, with the management measures to encourage this. Therefore, the loss of parking would have a greater detrimental impact on these users compared to others using the car park. This has not been addressed.
- 2.6 The applicant has also offered to fund the development of a School Travel Plan for John Ball Primary School. However, a Travel Plan has not been submitted with the application and there is no commitment to any sustainable travel measures for the school. There is no independent verification that the school would agree to implement any travel measures put forward and no proposal to secure this as part of the application. This cannot be relied on.
- 2.7 A Delivery and Servicing Management Plan has been submitted to identify how the Sunday market will still be able to operate in the future with the loss of parking. However, this assumes that only one disabled bay for residents would be provided on site. If five disabled bays for residents are provided this would impact on the proposed operation of the market. Consideration as to this scenario should be given as this could have significant implications to the operation of the proposed site.
- 2.8 It is assumed that no new residents or businesses on the site would be able to purchase on street parking permits or parking locally. However, this is not explicitly stated in the reports and should be confirmed.

Parking Surveys Undertaken

- 2.9 Whilst it is mentioned that parking surveys were undertaken in January 2018, 2021 (month unknown), 2022 (month unknown), and Wednesday 5th June 2024. Only the parking survey data for 2024 has been made public.
- 2.10 There has been no assessment for seasonal variation in parking demand to identify when the peak parking demand for the Village actually occurs, which is likely to be highest around Christmas rather than mid summer when the most recent surveys were undertaken. Parking demand on a weekend has also not been considered.
- 2.11 Figure 2-1 at Appendix G of the Transport Statement identifies the peak car parking demand for the station car park in June 2024 occurred at 12.30, with 55 cars parked. The graph also shows that demand for around 45-55 spaces occurs from 10.00 through to 15.30. Therefore, there is not just a peak lunchtime demand, but during the whole of the key shopping period for the Village businesses and for users of the station.
- 2.12 Table 5-1 at Appendix G notes that 9% cars stay more than 8 hours. Based on the 171 total arrivals this is 15 cars, suggesting commuters (either working locally or using train). However, a further 15 cars stay 6-8 hours, also likely to be commuters.
- 2.13 The direction of movement of car drivers from their vehicles was identified in table 4-1 at Appendix G, but only total percentage across the day. Noting 22% were to the station, 41% to the Village, 33% to Baizdon Road which is the direction of John Ball Primary School, and 4% other. The raw data confirms that the majority of trips to/from Baizdon Road were at the school drop off/pick up times with short duration of stay identified. During the middle of the day 10.00-15.00, when car parking demand was identified to be highest, 64% of the arrivals were visitors to the Village.
- 2.14 The station car park parking survey was undertaken using cameras at the entrance and an accumulation assessment, therefore the number of disabled bays in use at this time was not identified, future disabled parking demand therefore cannot be determined.
- 2.15 Tables 6-1 and 7-1 at Appendix G provide results from parking surveys on street around the Village and at Grove car park which is 75m to the northeast of the station. The June 2024 survey identified that there remained 2-4 car parking spaces at the Grove car park between 12.00 and 13.00, and between 3-7 spaces available on-street at this time. Essentially nearby car parks are therefore already close to capacity in the middle of the day, with at the peak time only five spaces available.

3.0 APPRAISAL

Impact on Existing Parking Demand

- 3.1 Of the 55 cars parked at the peak time of 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). This leaves a shortfall of 38 spaces at this time. With only around five spaces available locally at this time 33 visitors to the Village/station would either have to change their mode of travel, or just not travel to visit the Village/station.
- 3.2 However taking into account that the level of disabled parking for residents may need to increase to five spaces on site, there would actually be more likely to be a shortfall of 42 spaces, five able to relocate to nearby public car parking, with 37 visitors not able to park elsewhere at the peak lunchtime.
- 3.3 Appendix G Paragraph 5.4 states that 25 arrivals occurred before 08.30, with an average stay of eight hours. If only 17 public parking spaces are provided in the future this would displace eight vehicles currently arriving early, or if 13 public spaces are available, a displacement of 12 vehicles. At this time Grove car park has spaces. Whilst parking charges at Grove car park are higher for long stay parking than the Station car park some long stay vehicles could relocate to this car park rather than choose to change their travel behaviour. Thus, reducing the availability of spaces in this car park for future short stay visitors to the Village.
- 3.4 By not taking into consideration quantum of long stay parking currently taking place the impact of parking availability for short stay visitors to the Village has therefore been underestimated in the SLR assessment. The SLR work confirms there would be insufficient parking provision for the Village as a whole between 10.30 and 16.00. The raw data provided identifies between the hours of 10.00-15.00 64% of arrivals to the Blackheath Station car park were visitors to the Village. Therefore, this group of users of the car park would be disproportionately impacted by the loss of parking spaces as at this time there would be limited if any available parking elsewhere. During this period 22% were accessing the railway station reducing the ability for railway station users to potentially access the station.
- 3.5 The SLR approach does not provide the full picture of displaced vehicles. Across the day it would be a much greater number. The retained public parking on site is likely to be full for most of the day by commuters arriving early in the morning and parking all day. Therefore, based on the 171 arrivals currently taking place to the car park, identified by the survey, 154 to 159 cars would be displaced and need to park elsewhere across the day, change their travel mode, or not visit the Village/station/Baizdon Road. This suggests that there would be a significant impact on visitors to the Village.

Impact on Disabled Car Park Users

- 3.6 As disabled drivers are permitted to park for free in P&D bays on street and are charged to park in the Station car park it is likely that disabled drivers to the Village are already making use of on street bays. The disabled bays in the station car park are therefore more likely to be used by commuters. The number of public disabled parking spaces is to reduce from five spaces to two, with these spaces further from the platform entrance. The applicant has provided no evidence to confirm if the proposed number of public disabled spaces can accommodate the existing demand. The current spaces are also adjacent to the platform entrance and therefore can also be used for disabled passengers being dropped off. This would not be the case in the future.
- 3.7 The impact on disabled drivers and the ability for disabled train passengers to use the station has therefore not been appropriately assessed. This is of concern and contrary to the Department for Transport Inclusive Mobility guidance, December 2021.
- 3.8 It has also been suggested that during the construction period no public car parking will be available. This is an issue for disabled/or rail passengers with mobility issues wanting to park and use the station. On street parking locally is permit holder only or double yellow lines. Therefore, not available for disabled drivers wishing to park all day to access the station.

Impact on Primary School Operation

- 3.9 John Ball Primary School is adjacent to the site. It is understood that parents park in the car park at the start and end of the school day. However, the raw survey data suggests the following:
- The occupants of five of the cars parked in the car park early and stay all day, head towards Baizdon Road suggesting the car park is also used for school staff parking. Others arrive later in the morning and stay for half days, they could also be part time school staff. It has not been indicated what Travel Plan measures, if any, would be put in place be acceptable for school staff and how this would be secured through the planning permission. Therefore, a reduction in school staff car movements cannot be relied upon;
 - Around 20 parents park in the car park in the morning to drop off their children, and in the afternoon to pick up. This is low in comparison with the 655 children that attend the school and may relate to travelling difficulties the carers or children may have and should be reviewed. Therefore, the ability to reduce the level of car travel to the school further could be difficult;
 - Whilst a Travel Plan in principle would aim to reduce the car movements it may not remove many, especially as the percentage of school arrivals by car is low already based on the SLR work, and to date there has been no confirmation as to the Travel Plan measures to be provided and how these could be secured.

- 3.10 There are therefore potential safety issues that 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.
- 3.11 The accident records reviewed by SLR in the local area suggests pedestrians and cyclist are vulnerable locally.

Consideration for Visitors to the Site

- 3.12 There has been no consideration as to where visitors to the site, either to visit residents or the commercial/cafe units proposed, would park, if they needed to drive. Any visitors would also 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.

Consideration for Servicing/Delivery

- 3.13 Whilst servicing/deliveries for larger vehicles has been considered there has been no consideration for the typical quantum of smaller deliveries that now occur to residential developments including supermarket deliveries, couriers for example Amazon, DPD, EVRi etc, and food deliveries for example Deliveroo, UberEATS etc. The traffic generation assessment has discounted vehicle movements to the residential dwellings on the basis that these are car free. However, vehicle movements by these small delivery vehicles would still take place. This has not been considered in the assessment.

4.0 CONCLUSION

- 4.1 Only limited car parking survey data has been made available by the applicant and this is one for day in June 2024. Other data is available but this this has not been provided. There is no consideration of the parking demand on different days of the week, including the weekend, or consideration of peak trading periods for the Village businesses. This should be considered and is a fundamental flaw in the approach.
- 4.2 The extent of displaced car drivers particularly commuters has not been appropriately considered by the SLR assessment, with the report relying on the feedback from London Borough of Lewisham officers to reduce parking on the site.
- 4.3 The SLR work confirms there would be insufficient parking provision for the Village as a whole between 10.30 and 16.00. During this 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 displaced commuters making use of the limited remaining car parking available locally.

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- 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 has not been fully considered.
 - 4.5 Visitors who need to drive to the development have not been considered, further increasing future parking demand on local on street parking spaces and Grove car park.
 - 4.6 The traffic impact or parking for adhoc deliveries by smaller delivery vehicles has not been considered. As the volume of these movements to residential developments is continuing to increase the lack of assessment is an issue.
 - 4.7 Based on our review there are issues with the assessment undertaken and that the impact of the loss of parking on the wider area has not been fully considered. Therefore, it is unclear how London Borough of Lewisham can determine the application without a full and thorough assessment.