

SITE OF FORMER TENNIS CLUB, BLACKHEATH PARK, BLACKHEATH, SE3 0HB

**BUILT HERITAGE ASSESSMENT OF
PLANNING APPLICATION 25/0793/F**

MAY 2025



CONTENTS

1.0 INTRODUCTION.....3

2.0 STATEMENT OF SIGNIFICANCE.....7

3.0 ASSESSMENT OF THE PROPOSALS..... 13

4.0 CONCLUSIONS20

APPENDIX 1.0: HISTORIC DEVELOPMENT EXTRACTED FROM SAVILLS HERITAGE STATEMENT

APPENDIX 2.0: ARCHITECTS' JOURNAL ARTICLE DISCUSSING THE PROPOSALS

1.0 INTRODUCTION

- 1.1 Montagu Evans has been instructed by Blackheath Padel Court Action Group, a syndicate of local residents who are objecting to the development of the site at the former tennis club, Blackheath Park, Blackheath SE3 0HB ('the Site'). The Site lies in the administrative jurisdiction of the Royal Borough of Greenwich (the 'Council') and comprises a former tennis club, with four courts, which has been unused for over fifteen years. A clubhouse at the Site was destroyed by fire damage in 2020.
- 1.2 The proposed development comprises the redevelopment of the Site with a padel tennis facility including eight covered courts, a clubhouse, and associated parking and landscaping¹ ('the proposed development').

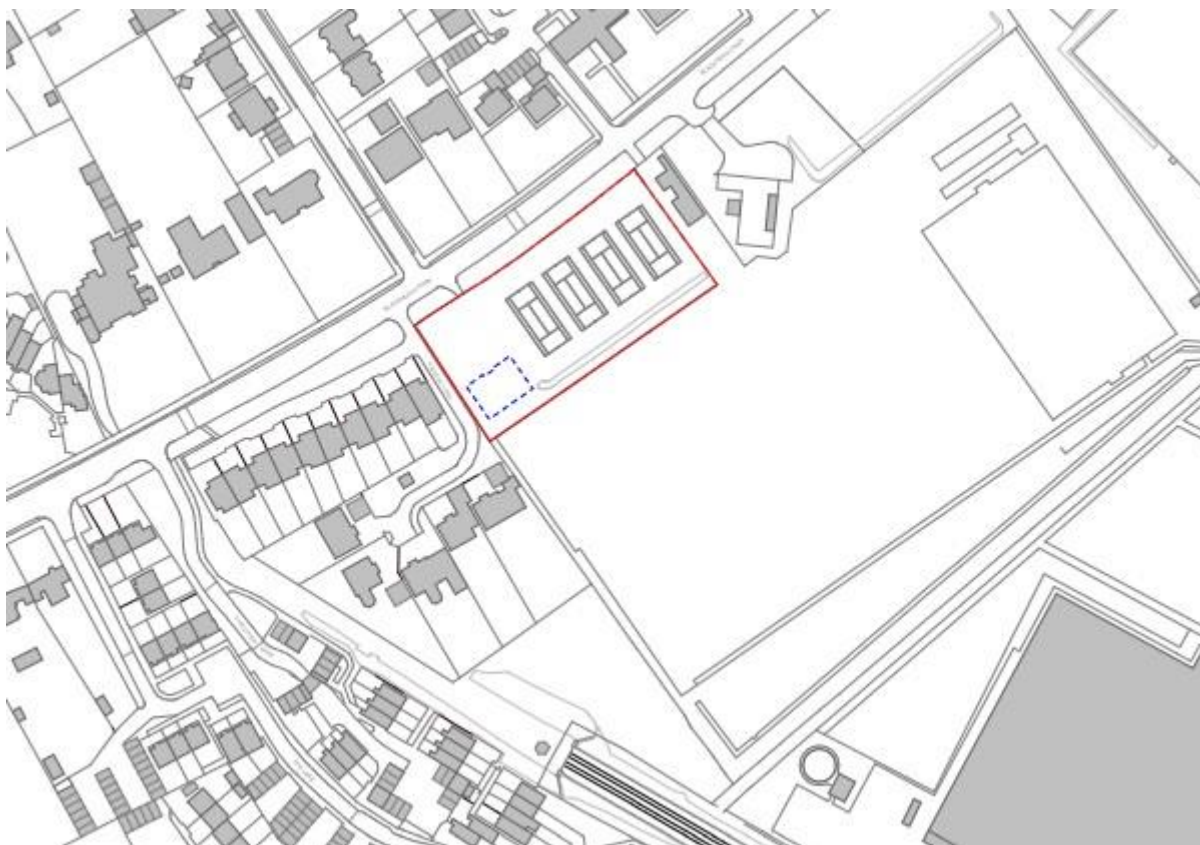


Figure 1.1: Site boundary (not to scale) (source: scheme drawings prepared by DFA)

- 1.3 A more detailed background to the proposals is set out in the Planning Objection Report prepared by DCC Planning, and we do not reproduce that in detail here.
- 1.4 The Site was formerly in use as a tennis club with four courts and a clubhouse, prior to its closure approx. 15 years ago. The clubhouse was destroyed by fire in 2020.
- 1.5 The Site lies to the south of Blackheath Park, one of the principal east-west routes through the area. It lies in close proximity to three heritage assets: Blackheath Park Conservation Area ('CA'), which has boundaries to the north and west of the Site; 103 Blackheath Park (grade II) and 101 Blackheath Park (grade II) also north-west. The listed buildings lie within the CA, forming part of (and deriving their setting from) its suburban character. There is also a locally listed building at 99 Blackheath Road which is a non-designated heritage asset. We have reviewed the Conservation Area Appraisal prepared by the Council and consider that the northern vegetated boundary of the site lies within the CA. It is also on Metropolitan Open Land ('MoL').
- 1.6 The heritage assets comprise sensitive and weighty considerations in planning terms, and considerable importance and weight attaches to the preservation of their special interest, including any contribution made to that interest by their setting².
- 1.7 Our instruction comprises the review of the application submission material as it relates to the historic environment and the conclusions presented in respect of impacts on designated and undesignated assets. Accordingly, in this report we

¹ LPA Ref: 25/0793/F

² National Planning Policy Framework (2024), Chapter 16: The Historic Environment, Paragraph 212

consider the effect of the proposals on the special interest or cultural significance of the assets surrounding the application site.

1.8 To discharge this instruction, we have undertaken:

- 1.8.1 A comprehensive review of the application submission material in respect of the historic environment, the proposed development, and landscape mitigation;
- 1.8.2 Research into the historic development of the area and its constituent landscape and built elements;
- 1.8.3 An extensive site view³ to understand the extent, character and appearance of those constituent elements and the way they relate to their immediate and wider settings.

1.9 This report has been prepared by Alexandra Rowley, a Senior Adviser in the built heritage and townscape team, and Dr Chris Miele MRTPI IHBC, a senior and owning Partner at Montagu Evans LLP.

Conservation Area boundary

1.10 We note here that the application refers to the Site being in the setting of the CA. However, Figure 4.6 (Trees and open spaces) of the CA Appraisal (2013) appears to indicate that some or all of the tree boundary along the north of the Site falls within the CA designation – this plan is included in full at **Figure 2.2** of this document, and an extract is included below for ease of reading. We have tried to definitively ascertain whether part of the Site boundary lies within the CA, but there is no clearer plan of which we are aware.

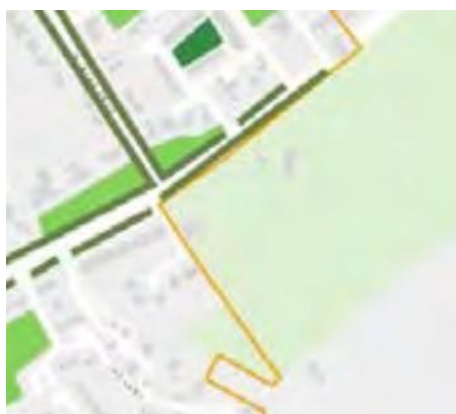


Figure 1.2: Extract from Figure 4.6 of the Blackheath Park Conservation Area Appraisal (p. 120), CA boundary in yellow

1.11 Our judgment on this point is that the trees on the northern boundary of the Site are therefore within the CA, and we have assessed the proposals on this basis. If, however, the decision-maker considers otherwise (that no part of the Site is within the CA), the contribution made by that boundary to the character and appearance of the CA (as a part of its setting) remains significant such that the effect is, for all intents and purposes, the same.

1.12 For brevity, we do not include a full list of the Development Plan policies salient to heritage considerations here. These are identified in the planning report prepared by DCC Planning. We do, however, refer briefly to the applicable statutory designations and national policy.

1.13 Statutory heritage designations are subject to separate and special statutory provision: in this case section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the 1990 Act'), which states that

In considering whether to grant planning permission [or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall 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.

1.14 On the basis that the trees on the northern boundary of the Site fall within the Blackheath Park Conservation Area, then Section 72(1) of the 1990 Act would also be applicable, and states that

³ Undertaken 29th April 2025

In the exercise, with respect to any buildings or other land in a conservation area, of any [F1] functions under or by virtue of] any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

- 1.15 The NPPF requires applicants for development proposals which have an effect upon the historic environment to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the importance of an asset, no more than sufficient to understand the potential impact of a proposal, and should use appropriate expertise where necessary⁴. Local planning authorities should identify and assess the particular significance of heritage assets that may be affected by a proposal, taking account of the available evidence and necessary expertise⁵.
- 1.16 Significance is defined in the National Planning Policy Framework (2024) as *'the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting'*.
- 1.17 The NPPF also states that, when considering the impact of a proposed development on the significance of a designated heritage asset, *'great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'*⁶
- 1.18 The decision-maker will be aware that harm to designated heritage assets (including from development within their setting) is a matter of considerable importance and weight and requires clear and convincing justification⁷. Harm to non-designated heritage assets stands to be considered under paragraph 216 of the NPPF, which requires a balanced judgment to be made, having regard to the scale of any harm or loss and the significance of the heritage asset.

Application Heritage Statement and Summary of Conclusions

- 1.19 The submitted application is accompanied by a Heritage Statement prepared by Savills, which considers the effects on built heritage assets. The Heritage Statement concluded that the proposed development *'would cause no harm to the significance of Blackheath Park Conservation Area or the grade II listed building of no. 103 Blackheath Park, by way of a change to their setting'*⁸.
- 1.20 This does not refer to the adjacent property at 101 Blackheath Park (grade II) which is next door to the west, approximately 67m north-west of the site boundary at nearest extent.
- 1.21 We have undertaken our own assessment of the effects of the proposed development on the identified assets, according to policy, guidance and best practice⁹, and conclude differently, identifying less-than-substantial harm to the Blackheath Park Conservation Area. This would be experienced within a small part of the CA, but would be significant where the proposed development was perceptible, and would affect the kinetic experience of moving through the CA, along Blackheath Park, introducing an uncharacteristic element into this part of the street scene.
- 1.22 This finding is on the basis of an assessment of the contribution made by the Site to the setting of the identified assets, and the way that this would be affected by the change.
- 1.23 We set out our reasoning at **Section 3.0**.
- 1.24 There are no heritage benefits associated with the proposals, and it lies outwith our scope and expertise to undertake a balancing of the planning benefits of the proposals against this identified harm.

Structure of this report

⁴ National Planning Policy Framework (2024), Paragraph 207

⁵ National Planning Policy Framework (2024), Paragraph 208

⁶ National Planning Policy Framework (2024), Paragraph 212

⁷ National Planning Policy Framework (2024), Paragraph 213

⁸ P. 7, Heritage Statement prepared by Savills

⁹ Historic England Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (2015) and Note 3: The Setting of Heritage Assets (2017)

1.25 The report is structured as follows:

- **Section 2.0** sets out Statements of Significance for the Blackheath Park Conservation Area and 103 Blackheath Park (grade II);
- **Section 3.0** sets out our assessment of the heritage effects of the proposals; and
- A conclusion is included at **Section 4.0**.

2.0 STATEMENT OF SIGNIFICANCE

- 2.1 This section provides a summary of the significance of the Blackheath Park Conservation Area, 101 Blackheath Park (grade II) and 103 Blackheath Park (grade II) and the contribution made to their setting by the land at the Site. The reasoning for this is to provide a baseline assessment against which we assess the effect of the proposed development.
- 2.2 As stated in the introduction, the application documents identify the Site as falling within the setting of the CA, though the trees and open spaces plan in the CA Appraisal (**Figure 2.2**) indicates that some or all of this boundary is within the CA. We have set out this assessment on the basis that the boundary is within the CA as illustrated on the plan, however, if the decision-maker considers otherwise, the impact does not materially change as the experience of the boundary from within the CA (and therefore its contribution to the character and appearance of the area) is the same in either case. Notwithstanding, if part of the Site were to fall within the CA, the statutory provision at Section 72 of the 1990 Act would be engaged for that aspect of the proposals.
- 2.3 We have reviewed the Heritage Statement prepared by Savills which was submitted as part of the planning application, and which includes statements of significance for the identified assets. This section is based upon our own professional judgment, and does not seek to replicate or critique their work.
- 2.4 For brevity, we do not reproduce a description of the historic development of the locality, but summarise key phases below where these have contributed to the existing form and character. The Savills Heritage Statement includes a description of the historic development of the area, illustrated with maps. We consider this to be accurate and have included extracts at **Appendix 1.0**.

Statement of Significance for the Blackheath Park Conservation Area

- 2.5 The area now designated as the Blackheath Park Conservation Area was developed on land owned by the Cator family, around a network of private roads which were first laid out in the 1820s under the ownership of John Cator. The earliest villas in the CA date from around this point, and have a genteel character. Post-war infill development is also a key characteristic of its built form, with Span estates developed in the post-war period forming a distinctive and characteristic element of the CA.
- 2.6 The 1860-70s saw the establishment of civic and cultural amenities including a bank and new shop fronts in the environs of Blackheath Station, entrenching the area as the village centre¹⁰, which it remains today. The scale and grain of built development varies, with finer grain housing close to the high street character along Blackheath Village, and larger villas set within generous plots further south and east, including along Blackheath Park.
- 2.7 The private roads and covenants of the Cator Estate were purchased by a residents' association in 1950. The differentiation from the public land beyond is marked by the white gates at the entrances to the estate, and road surfacing that is different from those of the public highways. The Conservation Area Appraisal notes that

'The prevailing character of the present-day Cator Estate is one of wide tree-lined avenues, with suburban villas and houses set back from the road but clearly visible from them. [...]

*White-painted timber gates and signs mark the entrances into the estate and evoke a semi-rural and private character. While there are no significant public open spaces, communal gardens, front and back gardens and mature street trees create a green and leafy character.'*¹¹

- 2.8 Blackheath Park specifically is described as

*'[one of] the most important sequence of historic buildings in the Conservation Area. Like other principal roads on the estate, Blackheath Park has a spacious, airy character that persists, notwithstanding the courtyard developments tucked in amongst the bigger houses.'*¹²

- 2.9 We agree. The road has a wide, boulevard character, shaded by street trees and set-back gardens with generous pavements. Houses are set within defined plots with off-road parking and established planting. The vegetation to each side of the road contributes to the sense of an established, suburban neighbourhood which is pleasant to move around

¹⁰ P. 6, Blackheath Park Conservation Area Appraisal (2013)

¹¹ P. 13, Blackheath Park Conservation Area Appraisal (2013)

¹² P. 14, Blackheath Park Conservation Area Appraisal (2013)

and has a distinctive character which derives from verdancy, trees, and buildings in traditional materials, set within large plots. As a consequence it has an open and spacious character. Traffic through the area is limited, and we understand a surcharge is required for peak time vehicular access – further differentiating the area as a quiet, domestic enclave.

- 2.10 This is reflected in the CA Appraisal, which says the use of the area is '*almost entirely residential, apart from the point at which it shoulders the village*'¹³, contributing to a '*quiet, undisturbed character, with little through traffic and few pedestrians*'¹⁴.
- 2.11 A natural features plan, included at p.112 of the CA Appraisal, identifies the northern border of the Site as including 'prominent trees or groups of trees', with the accompanying text describing how the tree-lined avenues along the principal roads '*reinforce the gentle arcadian character of the conservation area and bring seasonal variety*'¹⁵¹⁶.
- 2.12 The trees on the northern side of the Site make a positive contribution to the CA as a characteristic boundary treatment which forms part of the mature, leafy environment. Trees are not excessively pruned or manicured, contributing to an air of informality.
- 2.13 Collectively, the above aspects contribute to a character which is quiet, domestic, and framed by mature vegetation.

101 Blackheath Park (grade II)

- 2.14 101 Blackheath Park is positioned to the west of no. 103, comprising a villa built circa 1840 with a hipped slate roof over 2.5 storeys.
- 2.15 The building has an established, vegetated boundary which defines its immediate setting. Blackheath Park contributes positively as part of the experience of arriving at the property, and also through the regular arrangement of villas set within their defined plots which define the wider setting as one of quiet residential character.
- 2.16 The Site does not make a particular contribution to the setting of the listed building in its current configuration. The boundary planting is an attractive feature experienced as part of the approach, and contributes to the verdant character of the wider setting.

103 Blackheath Park (grade II)

- 2.17 103 Blackheath Park is situated on the west side of the junction between Blackheath Park and Morden Road, and comprises an early/mid-19th century villa set over three storeys with a garden to the front. The house is set back from Blackheath Park, within its defined plot, and is accessed via Morden Road to the east.
- 2.18 The primary setting of the building is within its defined garden, which is bounded by mature hedges providing screening from views in and out. In the winter months, however, there would be visibility out from the property, as these are not evergreen, and the wider street scene does make some contribution to its significance through the regular layout, domestic character and other diverse properties within this part of the CA.
- 2.19 The land at the Site makes no particular contribution to the listed building's setting in its current arrangement, except that its lack of built form defines the extent of this part of the neighbourhood and the dense vegetated boundary contributes to the verdant character of the locality.

99 Blackheath Park (locally listed building)

¹³ P. 108, Blackheath Park Conservation Area Appraisal (2013)

¹⁴ Ibid

¹⁵ P. 112. Blackheath Park Conservation Area Appraisal (2013)

¹⁶ 'Arcadia' is a term deriving from the tradition of classical art and literature. It is an idealised place, inhabited by shepherds, where the weather is always clear, and the landscape is bucolic (comprised of hills, woodland and water). It is meant to reflect a mythic, early stage of human history, which was pure and Edenic. 'Arcadian' is a term often applied to the 18th century landscape aesthetic. In this context, it has a metaphorical meaning, reflective of the characteristics of the area.

- 2.20 99 Blackheath Park is a locally listed building approximately 100m north-west of the Site at nearest extent. It is described in the Council's Local List as *'This house was built about 1835. Pleasing proportions and contributes to the general environment of the area. Various distinguished families have occupied this house from time to time.'*¹⁷
- 2.21 It is of local interest as part of the 19th century development in the area, following the characteristic arrangement of houses set within well-defined, verdant plots, and contributes positively to the character of the area.
- 2.22 As with the listed buildings, this character in turn contributes positively to its setting, as part of the attractive suburban context in which it is understood.

¹⁷ P. 35, Royal Borough of Greenwich Local Heritage List 2022



Figure 2.2: Trees and Open Spaces (site location indicative) (source: Blackheath Park Conservation Area Appraisal 2013, p. 112)



Figure 2.3: Blackheath Park, showing the leafy character of the CA



Figure 2.4: Blackheath Park, near the Site

3.0 ASSESSMENT OF THE PROPOSALS

3.1 This Section sets out our assessment of the proposed development on heritage grounds, which relate to the following attributes:

- The intensity of the use;
- Changes to the vegetated boundary; and
- The contrast with the existing character of the street scene and its contribution to the setting of the Conservation Area.

3.2 The salient considerations in heritage terms are

- Whether the proposals will preserve or enhance the contribution made by the Site to the CA; and
- The same with regard to the setting of nearby listed buildings.

ASSESSMENT OF THE PROPOSALS

Intensity of the proposed use

3.3 We understand from the submission materials that the Site has been vacant for over fifteen years, but formerly accommodated a tennis club with four outdoor courts. We understand also that the existing use of the Site is the subject of dispute between the applicant and objectors. For information, there was a previous consent on the Site for the establishment of a bowls club, which was later resubmitted in 2023. The land use of a bowls club has a similar impact on the CA to that which the tennis courts would have – that is, no harm.

3.4 It is not clear from the submission materials when the Site was first used as a tennis club, though the map regression indicates that this was likely the case by 1949. The adjacent land to the east and south-east was at this time indicated as in use as tennis courts and sports grounds.

3.5 The former tennis club accommodated four outdoor courts prior to the cessation of operations. To our knowledge these were not floodlit, and would likely only be used during favourable weather conditions, and used more frequently on weekends and summer evenings.

3.6 The proposed development, by contrast, seeks to introduce eight padel courts to the Site, which are to be accommodated in a 'lightweight canopy structure', and accompanied by seventeen car parking spaces and 20 cycle parking spaces.

3.7 Whilst parking was included next to the tennis court, the scale of operations and nature of the arrangement of the Site, having only four courts, indicates strongly that this was a club for use by local people within the Blackheath area. The maximum number of players on four courts, assuming all were occupied with doubles matches, would be 16 – the padel courts would accommodate double this, and in all weathers, between the hours of 06.00 and 23.00 seven days per week.

3.8 This represents a significant uplift in the intensity of the use of the Site, which would impact the setting of the CA in three ways.

3.9 First, the increase in visitor numbers would correspondingly increase the number of vehicles passing through and adjacent to the CA in order to access the Site. Assuming maximum occupation of all courts, for all of the 17 hours of operation, this could lead to 272 visitors to the Site in one day, plus staff; an intensity of use that is out of character with the suburban context comprising the CA and listed building.

3.10 It is notable that the Site is approx. 0.8km from the nearest station (Blackheath), and the nearest bus stop is 1km walking distance to the south¹⁸. The PTAL for the immediate environs of the Site is 0¹⁹. Given the number of courts and the hours in which they are available, it follows that many users would be arriving from outwith the immediate area, and therefore would require car or other transport to reach the Site.

¹⁸ P. 6 of the Framework Travel Plan prepared by Magna Transport Planning Ltd (March 25) submitted with the application

¹⁹ P. 7 of the Framework Travel Plan prepared by Magna Transport Planning Ltd (March 25) submitted with the application

- 3.11 Second, the intensity of the use would likely be consistent through the winter, and during hours of darkness, as the courts are accommodated within the tent structures. This would be a significant increase in the hours and seasons of operation from that of a local outdoor tennis club.
- 3.12 These structures are described as ‘semi-transparent’, with a published article in the Architects’ Journal stating that the *‘Two curved lightweight canopy structures will cover the eight padel courts, which Downen Farmer says provides ‘functionality and aesthetics’. The design and materiality will, meanwhile, allow for natural light to filter through, ‘maintaining a bright and open atmosphere’ while protecting users from the weather.’ (Appendix 2.0)* It follows that a material that would allow natural light in, would also allow artificial light to spill out during hours of darkness. This would be perceived as an uncharacteristic and urbanising element in the setting of the identified heritage assets.
- 3.13 Third, the area of a tennis court (for doubles) is typically 260.9sqm – the proposals describe each of the eight padel courts at 200sqm each. The current character of the Site, including its vegetated nature, would be altered to accommodate the number of courts and form of development proposed.
- 3.14 These facilities are increasingly common and popular, with padel noted as one of the fastest growing sports in Europe, and we have included aerial imagery showing the context of a number of padel courts in Greater London. We return to these in a later section.
- 3.15 We consider that this increased use would be incongruous in the setting of this part of the CA, which is domestic in nature, and outwith the village centre character at Blackheath Village and in the environs of the station.

Landscape buffer

- 3.16 As discussed in the preceding section, the dense vegetated boundary to Blackheath Park makes an important contribution to the CA, reflecting its leafy, suburban character and defining the extent of the residential development in this area, and this is reflected in the CA Appraisal, which states at page 1 that *‘a signature quality of Blackheath Park is the harmonious relationship between dwellings and landscape on the long and broad tree-lined avenues that run through the area’*. The land beyond is read as a landscape buffer at the edge of the neighbourhood, and whilst there are views through to Blackheath High School, a school serving a local need is accepted as part of a local area.
- 3.17 We understand from the submission materials that the proposals include the removal of three low-quality Category ‘C’ trees, described as having a *‘moderate impact on wider public visual amenity due to their location, species characteristics and condition’*, and three Category ‘B’ trees²⁰. The DAS identifies ‘trees categories C or below’ as having ‘potential for removal’²¹.
- 3.18 The arboricultural report includes a number of plans illustrating the tree retention and removal strategy, which we have reviewed in preparing this report.
- 3.19 We note that the dense understorey which forms much of the boundary at street level is ringed in grey, indicating ‘Category C in the Appendix to that document (unpaginated), and we include below the tree protection plan which indicates the removal of the ‘group/ hedge’ edged in red. The area we understand to be ‘Category C’ extends beyond this, though there is no commitment in the application to retaining Category C vegetation on our reading of the documentation.

²⁰ P. 12, Arboricultural Impact Assessment prepared by Chartwell Tree Consultants Ltd (dated 6.1.2025, uploaded to RBG website 28.4.2025),

²¹ P. 20, Design and Access Statement prepared by Downen Farmer Architects

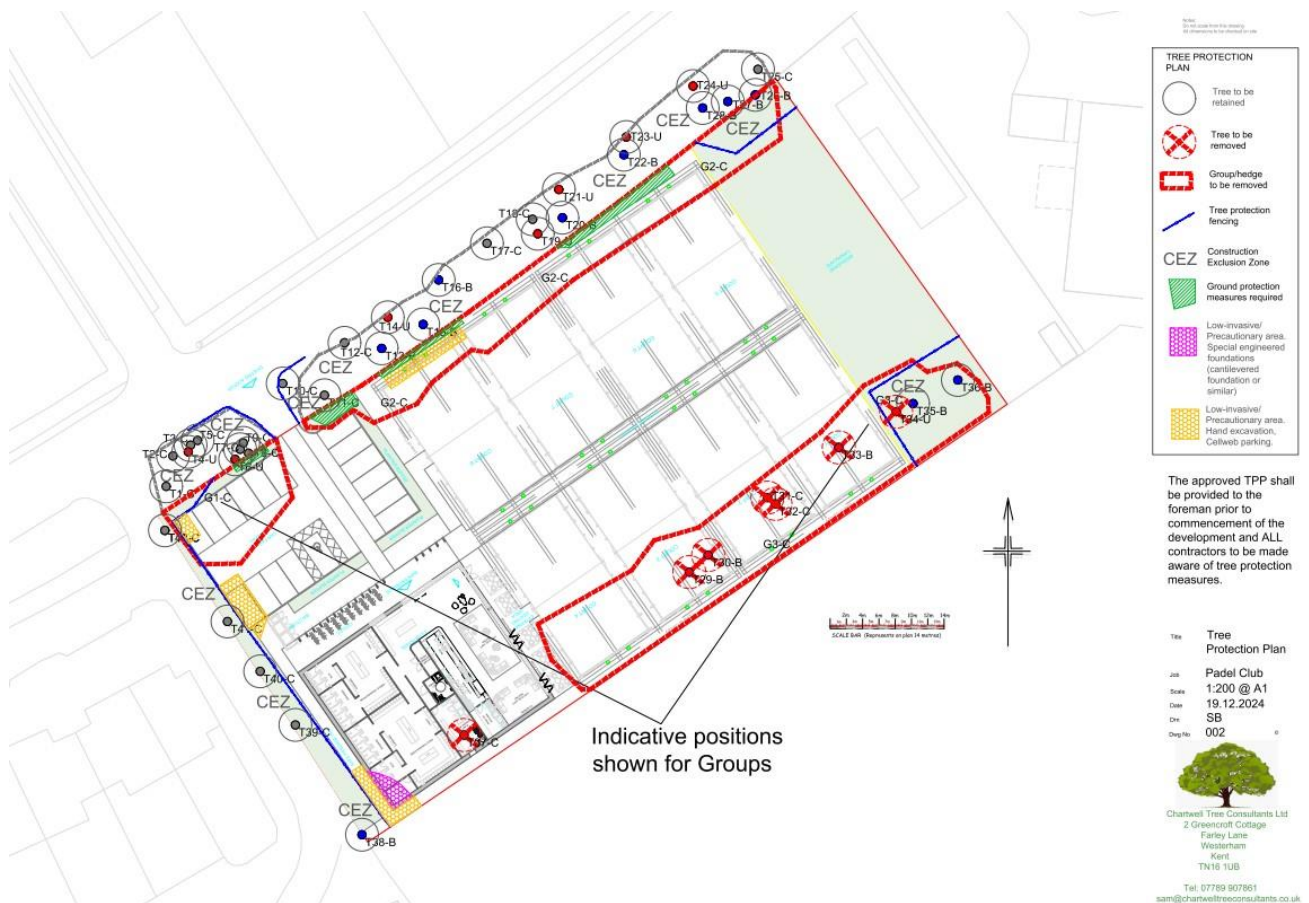


Figure 3.1: tree protection plan, illustrating trees and hedges to be removed as part of the proposals (source: arboricultural assessment)

- 3.20 Notwithstanding the categorisation of this boundary landscape, it makes an important contribution to the character and appearance of the CA, reinforcing and complementing the landscape characteristics of the CA.
- 3.21 The removal of much of the understorey as well as some of the trees would remove an element which positively contributes to the CA or its setting, and would also open views into the Site, where the new tented structures would be an urbanising and alien addition.
- 3.22 The introduction of a more closely-managed landscaping scheme along the boundary would inevitably introduce a degree of formality which this part of the CA's setting lacks presently. As noted in the preceding section, the Site forms part of a landscape buffer marking the boundary of the CA, and the dense boundary contributes to this through its unmanicured character. The formalisation and close management of this boundary would extend the perception of the settlement into the Site (which we note is also MoL). The tree boundary is, on our reading, within the CA boundary, and should be considered as such, but even if this were considered to fall within the setting, the effect on character and appearance would be practically the same.
- 3.23 We also consider that the removal of this boundary would have a detracting effect on the setting of no. 103 Blackheath Road (grade II) and 101 Blackheath Road (grade II) for the same reasons – it would erode the verdant character of an important boundary in the locality. No. 99 (locally listed) is not a designated heritage asset. Nevertheless, the proposals would affect the experience of the property within its setting in the same way.

Contrast with the existing character of the street scene

- 3.24 Whilst not within the CA, the land to the south is read as a landscape buffer which defines the enclave of residential development along Blackheath Park. The Site in its present condition is redundant, with areas of hardstanding and a closed-off access point. The existing condition within the Site does not make a meaningful contribution to the setting of the CA, though its unobtrusiveness and lack of built form and verdant boundaries are positive aspects which contribute to the sense of openness to the south.
- 3.25 The Site, experienced in conjunction with the adjacent playing fields associated with the school, provides a visual break from the built-up environment, and contributes to the village character of Blackheath. The introduction of a sports complex on this land would erode this sense of openness, replacing it with built form and an intensive activity, which would be

perceptible through increased vehicular movements (including service vehicles such as bin collection) and notably lightspill during hours of darkness.

- 3.26 The principle of the Site and its environs being used for outdoor sport is long established, including the sports fields to the south-east which are now part of Blackheath High School. There is a marked difference in character, however, between school playing fields and a commercial enterprise such as that proposed.
- 3.27 First, as part of the school complex, the playing fields contribute to an ancillary feature which is consistent with (and supportive of) the predominantly residential character of the locality. The use of school facilities is likely to be limited to the school day, and within the parameters of afterschool clubs – significantly less than seven days per week between the hours of 6.00 and 23.00.
- 3.28 Second, the land of the playing fields remains open in character (i.e. not built upon) to the south of Blackheath Park, thus maintaining the sense of openness in views through the tree boundary.
- 3.29 The proposed padel courts have a materially and demonstrably greater urbanising impact than tennis courts or sports fields due to their enclosed nature and the requirements for supporting infrastructure. While tennis courts are open and low-profile (with the net forming the highest point), padel courts have enclosed playing areas to contain the ball. The proposal for a semi-transparent tent amplifies this urbanising effect, creating a substantial enclosed volume that would be visually intrusive in a way that open tennis courts would not, even assuming they were lit and fenced. This enclosed form introduces a visually intrusive land use, which would extend to 10m at its tallest point; a significant alteration from the existing open character of the space, and in materials that are obviously not traditional.
- 3.30 The sloping topography would contribute further to this visibility, as from the north (along Morden Road and Sweyn Place), viewers would be looking 'down' out of the CA toward the Site and the courts therein, diminishing the sense of openness and the perceived tranquillity – or 'quiet, undisturbed character, with little through traffic and few pedestrians', described in the CA Appraisal²².
- 3.31 We note that the applicant states in the DAS that 'following a site visit at the end of November, we observed that the leaves remain on the trees even in winter, providing a natural buffer around the site throughout the year. Most houses along the street benefit from this natural shielding, which fosters a serene, organic atmosphere while offering occasional glimpses of the site'. Notwithstanding the above tree and understorey removal, we dispute that the trees in the locality are evergreen – and therefore they would lose their leaves in winter, resulting in greater visibility into the Site.
- 3.32 This is illustrated in winter images provided by our client, which show some of the surrounding trees in their winter condition.

²² P. 108, Blackheath Park Conservation Area Appraisal (2013)



Figure 3.2: Winter view of the trees along the northern boundary of the Site (source: photography by our client, oriented south towards the Site laterally over Blackheath Park)

- 3.33 Additionally, we consider that the reliance on visual screening would not in this case be sufficient to mitigate the adverse effect on the character and appearance of the CA. While vegetation may offer a partial and seasonal visual barrier, it would not address the inherent incompatibility of the proposed development with the quiet, suburban character of the CA, or the effect of the increased intensity of the use. Additionally, this does not mitigate the potential for noise and light spillage which would be incongruous in this location.

Other installations: Appropriateness and context

- 3.34 In preparing this response, we have undertaken a desktop review of locations in Greater London where padel tennis courts have been accommodated, and include a few examples below.
- 3.35 Canary Wharf, which is discussed in the DAS, is a unique location and this is not an appropriate comparison for obvious reasons. It appears that the applicant is inviting the LPA to treat that court as similar to this one. Our desktop study indicates that padel courts are generally located either in urban centres (where the intensity of the use would not be an incongruous element), or in out-of-centre locations that are of limited sensitivity, such as adjacent to industrial parks.
- 3.36 A few examples are included below with an aerial view illustrating the surrounding context. None of these lies adjacent to a CA notable for its tree-lined avenues and relationship between dwellings and landscaping²³.

²³ Conservation Area Appraisal, p. 1 – ‘A signature quality of Blackheath Park is the harmonious relationship between dwellings and landscape on the long and broad tree-lined avenues that run through the area and in the post-war estates.’

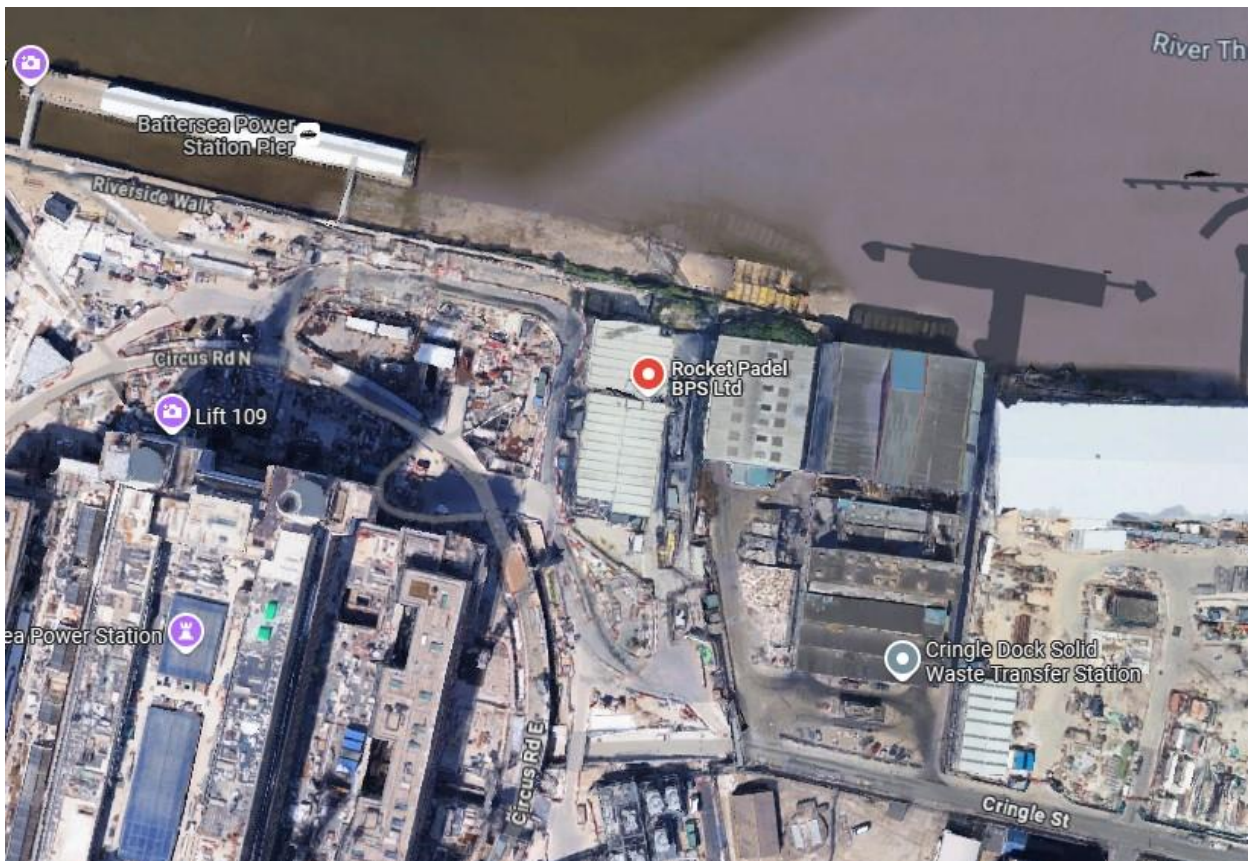


Figure 1: Aerial view of Battersea Power Station (source: Google)

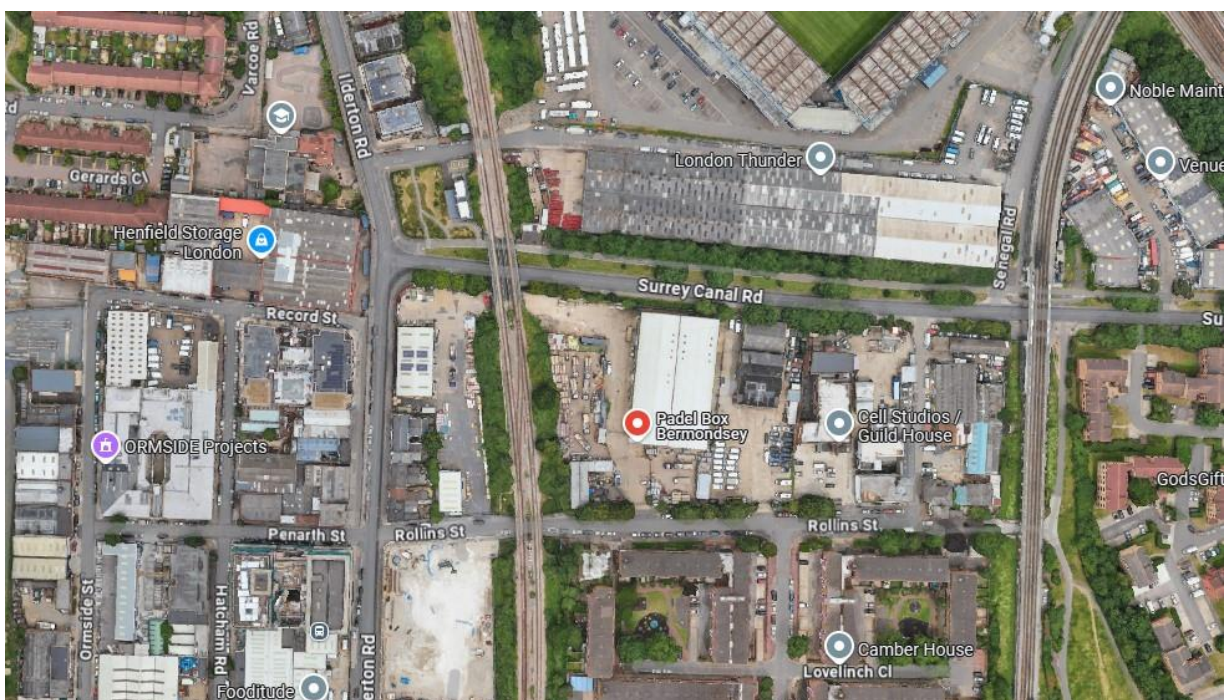


Figure 2: Padel Court in Bermondsey (source: Google)



Figure 3: Padel Court in Stratford (Source: Google)



Figure 4: Padel Court in Wandsworth (Source: Google)

4.0 CONCLUSIONS

- 4.1 In summary, the proposal causes harm to the character and appearance of the Blackheath Park Conservation Area as an area of special architectural and historic interest, for the following reasons.
- 4.2 First the intensity of the use in itself, through numbers and hours of operation, and car movement which would be harmful and challenging.
- 4.3 Second, the removal of boundary vegetation along the south side of Blackheath Park, which makes a positive contribution to the character and appearance of the CA (either directly, or through contribution to its setting).
- 4.4 Third, through visual intrusion, by the introduction of an incongruous form, using materials alien to the area, and introducing elements such as lighting which would affect the character of the area.
- 4.5 We also find a lower order of less than substantial harm to 103 Blackheath Park (grade II) and 101 Blackheath Park (grade II) as a result of the change to their wider setting. We also find a low degree of harm arising from the change to the setting of 99 Blackheath Park (locally listed building), which stands to be considered under paragraph 216 of the NPPF.
- 4.6 The harm affects one part of the CA and comprises a low order of less-than-substantial harm. The heritage assets comprise sensitive and weighty considerations in planning terms, and considerable importance and weight attaches to the preservation of their special interest, including any contribution made to that interest by their setting²⁴.
- 4.7 The proposals are also incongruous in the setting of the nearby listed buildings at 101 and 103 Blackheath Park, causing a low order of less than substantial harm by reason of change to character and intrusion.
- 4.8 For the same reasons, the proposals would cause some harm to the locally listed building at 99 Blackheath Road, though this limited due to the separating distance and the local significance of the non-designated heritage asset. Harm to non-designated heritage assets stands to be considered under paragraph 216 of the NPPF, which requires a balanced judgment to be made, having regard to the scale of any harm or loss and the significance of the heritage asset.
- 4.9 In our judgement, therefore, the adverse impact of the proposals is demonstrably greater than previously assessed in the Savills Heritage Statement. This arises because that analysis does not undertake a detailed assessment of the contribution made by the Site to the CA. Likewise the report appears not to have identified that the northern boundary lies within the CA boundary, and on that basis, the harm we identify stands to be considered under section 72(1) of the 1990 Act.
- 4.10 Harmful impacts on designated assets comprise weighty material considerations, which stand to be weighed in the planning balance by the decision maker.

²⁴ National Planning Policy Framework (2024), Chapter 16: The Historic Environment, Paragraph 212

APPENDIX 1.0

EXTRACT FROM SAVILLS HERITAGE STATEMENT



George Duffield
E: george.duffield@savills.com
M: +44 (0) 7813 997 165
T: +44 (0) 2074 098 092

33 Margaret Street
London W1G 0JD
savills.com

February 2025

HERITAGE STATEMENT: Blackheath Padel, Blackheath Park, London, SE3 0HB

Savills Heritage and Townscape have been commissioned by Vfund (hereafter 'the client') to provide a Heritage Statement in relation to a planning application for a proposed development at a vacant tennis court in Blackheath Park (hereafter 'the Site', shown on **Figure 1**). The Site is situated in the Local Planning Authority (LPA) of Greenwich, located immediately north of Blackheath High School Sports Grounds, towards the junction of Paddock Close and Blackheath Park Road.

The proposals comprise the conversion of the Site into padel tennis facilities including courts, a clubhouse and associated parking. A pre-application has been undertaken, with feedback from the LPA received on 2nd October 2024 (planning ref. 24/1849/PRE1). The proposals were received positively from the LPA, stating that the principle of development is generally considered acceptable.

The Site is not listed nor within a conservation area, but is located immediately south of Blackheath Park Conservation Area and No.103 Blackheath Park, a Grade II listed building (**Figures 1-3**). A Heritage Statement is therefore required for the full application to assess the impact on the setting of these identified heritage assets.

The heritage assets scoped in for assessment are limited to the aforementioned Blackheath Park Conservation Area and No.103 Blackheath Park Road, a Grade II listed building. The Grade II listed building of No.101 Blackheath Park Road, situated adjacent-west to No.103, will be assessed as part of the conservation area due to its location and heavily vegetated boundary, resulting in a lack of inter-visibility with the Site. This scoping exercise is based upon pre-application advice from the LPA and professional opinion with regard to the setting of the relevant heritage assets and the proposals' impact within this setting.

Historic background:

Wricklemarsh was recorded as a formal estate or manorial holding during the Domesday survey of 1086. Until the 18th century, Blackheath Park was largely open countryside and common pasture, with the hamlet of Lee to the

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southwest being the main development. Exceptions include Morden College, founded in 1695 as almshouses by Sir John Morden, and Wricklemarsh Manor, which became part of the Morden estate. In 1721, Gregory Page, a local landowner and brewer, acquired Wricklemarsh and commissioned architect John James to construct a grand Palladian mansion. Completed in 1723, the house stood on elevated ground between the Upper and Lower Kid Brook, with formal landscaped avenues and ornamental ponds. The Morden Estate is shown on the John Rocque map of 1746 (**Figure 4**) with Wricklemarsh Manor to the centre with its surrounding formal landscape, and Morden College situated to the north-east. At this time, the Site was part of Ridley Marsh to the east.

By 1783, Page's descendants sold 280 acres of the estate to timber merchant John Cator, who dismantled the mansion in 1787 and leased plots for development. The mansion site corresponds to today's crossroads of Blackheath Park Road, Pond Road, and Foxes Dale.

The first new house in the area, built in 1787 on the western edge of the estate, reused materials from Wricklemarsh ruins. This building is still extant, now part of Our Lady, Help of Christians Roman Catholic Church. Development in the area was shaped by the Cator family, who issued leases throughout the 19th century. Initial construction near Blackheath village included semi-detached houses on Cresswell Park and terraced houses on Lee Road. Located at the junction of Blackheath Park Road and Pond Road, St Michael and All Angels' Church was built in 1830. It was designed by George Smith, Surveyor to the Morden College Trustees.

By the 1840s, substantial villas had been constructed on Lee Road and Pond Road. As shown on the Tithe map dating to 1844 (**Figure 5**), Blackheath Park Road was built during this period, and also laid out with villas. This includes Nos. 103 and 105 which are still extant, lying immediately north-west of the Site and separately designated as Grade II listed buildings. The surrounding area was still characterised by its rural landscape with a series of farms associated with Kidbrook to the east. The North Kent railway was constructed in 1849 underneath Morden College in a tunnel, ensuring uninterrupted access to the Heath. Another tunnel was added in the 1890s for the line to Bexleyheath.

By the late 19th century, the village area underwent major changes, with the construction of banks, cultural buildings, and shopfronts. The layout of Blackheath was mostly established by the end of the century, with the core of the development shown on the Ordnance Survey map dating to 1895 (**Figure 6**). Blackheath Park Road is shown on the 1897 Ordnance Survey map (**Figure 7**), laid out with its mid-19th century villas. At this time, the Site remained an empty piece of open land. By the 1930s, Blackheath Park Road was connected to Blackheath Grove.

Minimal changes occurred in the early 20th century, with only a few Edwardian houses added before World War I. By the 1930s, larger estates were subdivided for middle-class housing, creating more distinct sections in the Blackheath Park area. Detached homes lined roads like Parkgate, Foxes Dale, and Manor Way. Some older mansions were converted into flats or replaced by denser housing developments. The area escaped significant wartime destruction, though some damaged houses were rebuilt.

As shown on the 1949 Ordnance Survey map (**Figure 8**), the Site and its surrounding area to the south and east was used as sports grounds from the mid-20th century, including several tennis courts and pavilions. The area has remained in this use ever since, now comprising two athletics fields, several tennis courts and an astro turf, all of which are associated with Blackheath High School.

In the 1950s, post-war reconstruction began with the development of public housing. This included Brooklands Park Estate which was laid out in point blocks, built by London County Council in 1955. Post-war development also included the 1960s/70s blocks known as “The Plantation” and Sweyn Place, located to the north of the Site.

Private housing developments in the 1950s and 1960s were dominated by Span estates, which were characterised by small, tightly planned enclaves often hidden behind existing structures. These estates mixed flats and houses, used various materials, and were designed to blend with the landscape while minimising the impact of cars. Four major Span schemes were completed in the 1950s, with another four in the 1960s. These larger schemes introduced small access roads, creating modern, open communities within older areas. Examples include the Priory, Hallgate (Grade II listed) and Corner Green.

In the 1970s and 1980s, the development continued with additional Span projects, one by Barrett Homes, and others like Guy Barnett Grove. Individual houses, often designed by architects such as Peter Moro and Patrick Gwynne, also pushed the boundaries of architectural design. Since the mid-1980s, due to limited space and multiple landowners, larger developments have been limited, with changes mainly occurring through the addition, replacement, or extension of existing properties.

Significance of relevant heritage assets:

103 Blackheath Park (Grade II listed building)

103 Blackheath Park was designated as a Grade II listed building on 8th July 1973. The building is an early to mid-19th-century villa, featuring two storeys and a three-window arrangement on its main garden-facing front. Constructed of greyish-yellow brick, it has a low-pitched slate roof punctuated by two shallow, pediment-like gables facing the road, with overhanging eaves and a console-bracketed cornice that steps back over the recessed central bay. The sash windows, fitted with glazing bars, sit beneath gauged, shallow segmental brick arches. On the ground floor, the outer windows are adorned with console-bracketed cornices, while the stuccoed central bay has a cornice above and an additional window fitted with external louvered shutters. The north-facing entrance front, opening onto Morden Road, features irregularly placed windows of similar style and a reproduction classical doorcase.

Significance

The significance of 103 Blackheath Park is derived from being a good example of a Regency style villa. This is illustrated through its symmetrical proportions, classical elements, louvered shutters, low-pitched roof and front-facing garden, as well as the use of exposed brick and stucco. This results in a refined and elegant architectural style,

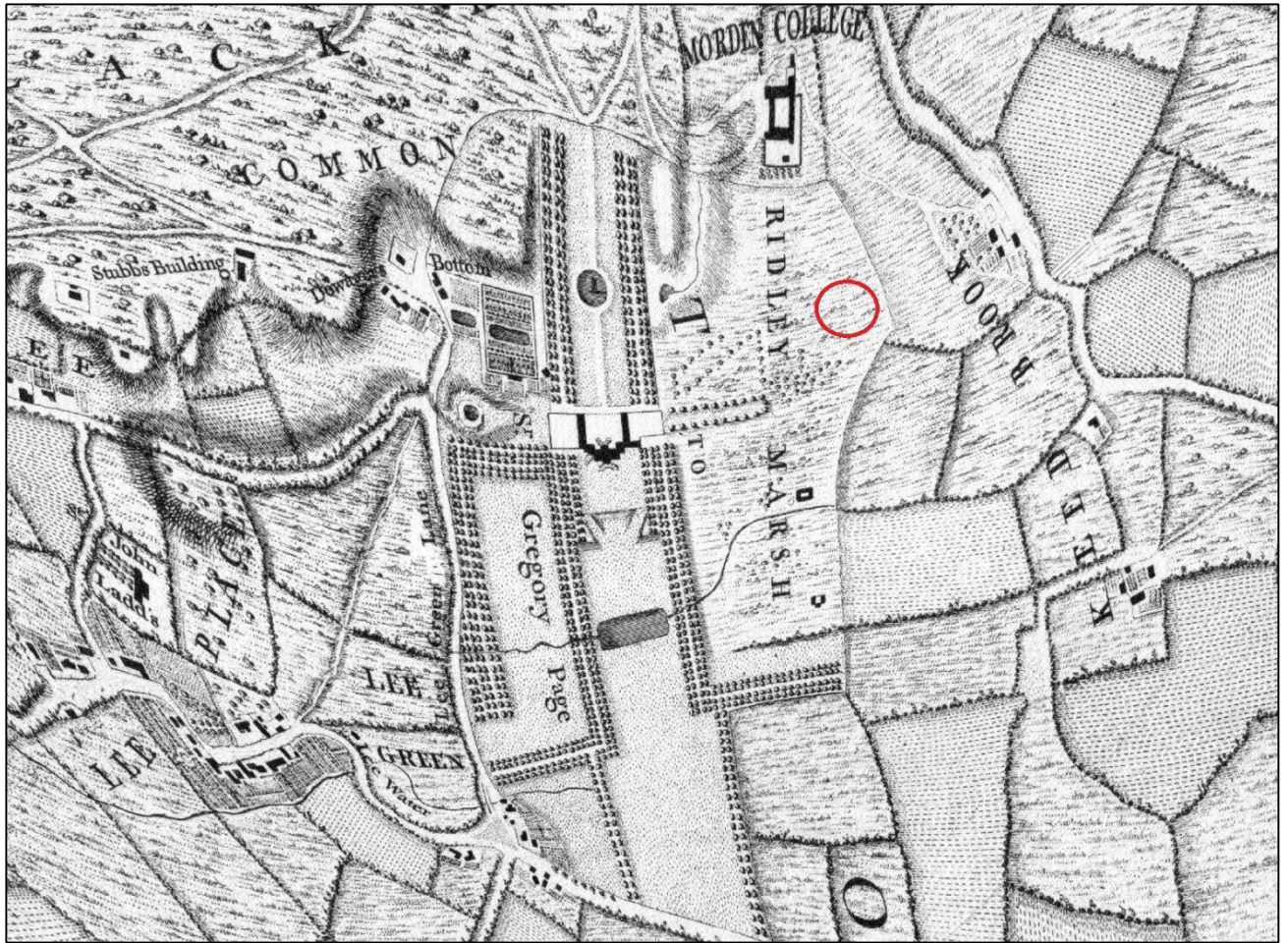


Figure 4 - 1746 John Rocque map with the approximate Site location highlighted in red

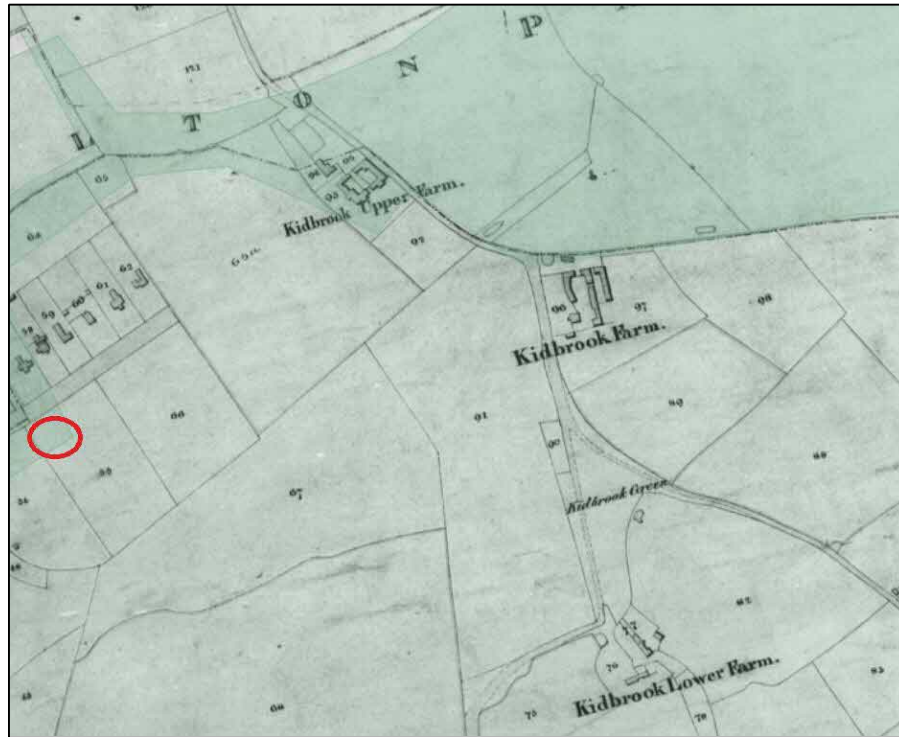


Figure 5 – 1844 Tithe map with the approximate Site location circled in red

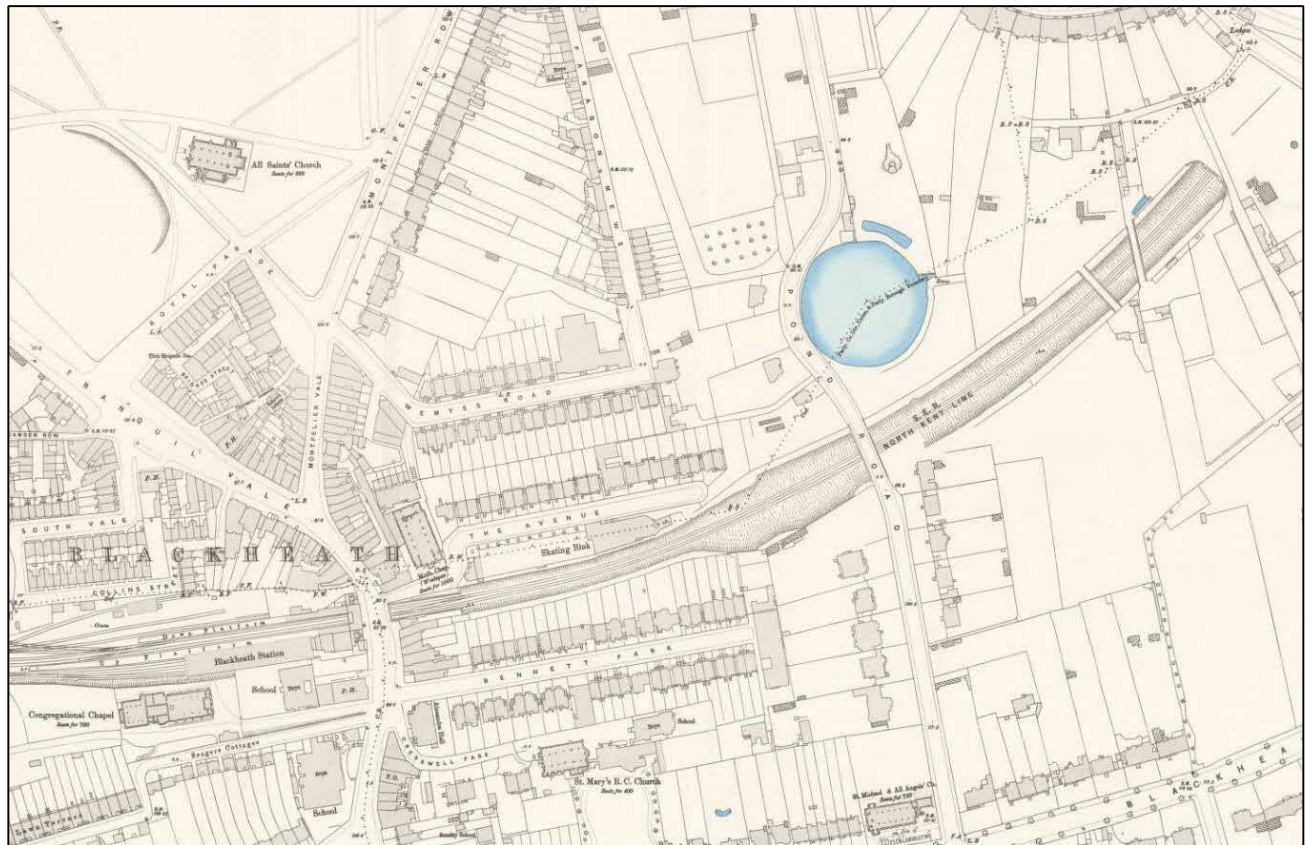


Figure 6 – 1895 Ordnance Survey map showing the historic core of Blackheath



Figure 7 – 1897 Ordnance Survey with the approximate Site boundary highlighted in red

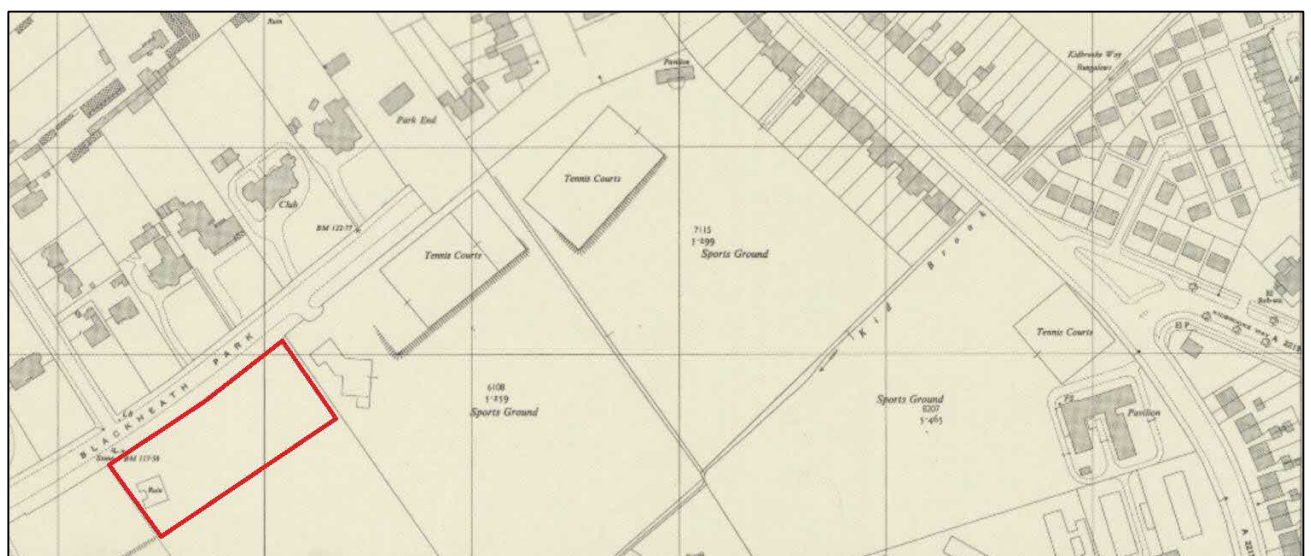


Figure 8 - 1949 Ordnance Survey map with the approximate Site boundary highlighted in red

APPENDIX 2.0

ARCHITECTS' JOURNAL ARTICLE

Downen Farmer submits Scandi-inspired padel club scheme for Blackheath

1 MAY 2025 • BY GINO SPOCCHIA



1/10 Downen Farmer's Blackheath padel club scheme (submitted April 2025)

Source: Downen Farmer Architects

Downen Farmer Architects has submitted plans to transform an abandoned tennis court in Blackheath, south-east London, into a Scandinavian-inspired padel club

The Peckham-based practice's proposals for client V Fund and operator **Padium** would transform abandoned tennis facilities in Blackheath, south-east London, into a padel court club with courts and a clubhouse.

eight covered padel courts and a 450m² clubhouse building with associated landscaping, car and cycle parking and amenities on a 4,470m² site next door to Blackheath High School sports ground and nearby homes.

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Two curved lightweight canopy structures will cover the eight padel courts, which Downen Farmer says provides ‘functionality and aesthetics’. The design and materiality will, meanwhile, allow for natural light to filter through, ‘maintaining a bright and open atmosphere’ while protecting users from the weather.

A clubhouse building will provide changing rooms, a reception office, and a space for customers to relax. Downen Farmer says its minimalist timber design is inspired by the Scandinavian and Nordic origins of Padium, which also operates a padel club at Canary Wharf.



Source:Downen Farmer Architects
Downen Farmer’s Blackheath padel club scheme (submitted April 2025)

In planning documents, **Downen Farmer** said its proposals would breathe new life into the site, ‘enhancing its value to the community and restoring its role as a positive and functional space’ following a fire in 2020. The new clubhouse is located on the site of the existing burnt-out structure.

The former tennis club contains four tennis courts, with hard-standing landscaping and a pavilion in the south-west corner of the site, which was destroyed by fire. The structure and its facilities have remained unused since.

The practice added that ‘accessibility has been a key consideration, with the site designed to accommodate pedestrians, cyclists, and vehicles, providing convenient

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A planning decision is due to be made this year.

Architect's view

The clubhouse is designed with a focus on materiality that reflects a Nordic-inspired aesthetic, emphasising simplicity, functionality, and a connection to nature.

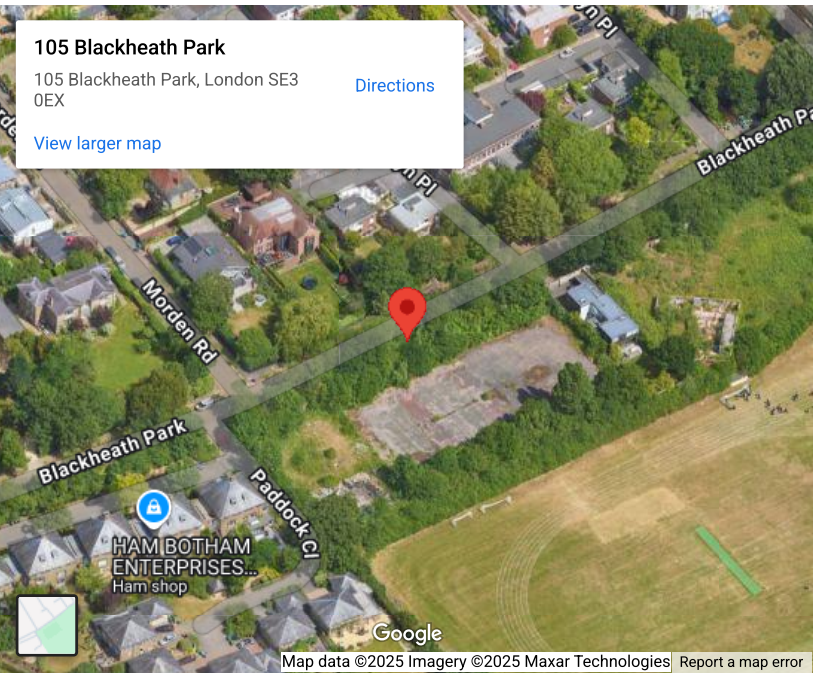
Timber is the primary material, chosen for its warmth, sustainability and ability to harmonise with the surrounding environment. The use of natural wood finishes highlights the clean, modern lines of the structure while creating a welcoming and tactile experience for users. This approach not only complements the clubhouse’s low-lying design but also reinforces its integration into the landscape and local setting.

The clubhouse design prioritises functionality and aesthetics to create spaces that are not only practical but also visually appealing. The goal is to design facilities that attract and retain members by providing an inviting and well-thought-out environment.

Inclusivity is a key focus, ensuring that the facilities are accessible to all users, regardless of age, gender or physical ability. By integrating features that accommodate diverse needs, the design fosters a welcoming atmosphere and promotes broader community engagement.

Changing rooms can be flexible, but the current arrangement is based on projected visitor requirements (informed by data from Padium’s existing London club).

Site view



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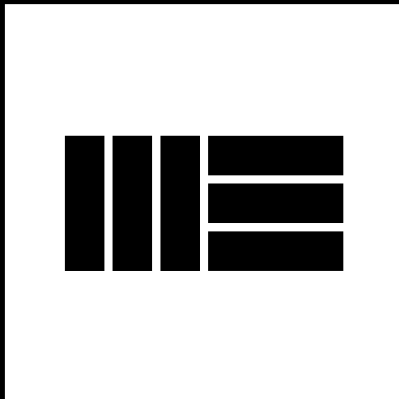
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