

# Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 23/10/2020 4:09 PM from [REDACTED]

## Application Summary

Address: BLACKHEATH BUSINESS ESTATE, BLACKHEATH HILL, LONDON, SE10 8BA

Proposal: The construction of a part seven/part nine storey building on the site of Blackheath Business Estate, Blackheath Hill SE10 to provide 31, one bed 24, two bed and 8, three bedroom self-contained flats and a four storey building to provide 2288 sqm<sup>2</sup> commercial space, together with disabled parking, cycle parking, play space, refuse storage and plant.

Case Officer: Patrycja Ploch

[Click for further information](#)

## Customer Details

Name: [REDACTED]

Email: [REDACTED]

Address: [REDACTED]

## Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Reasons for comment:

Comments: I wish to know why have continually been unable to open and read any of the lodged complaints on this Planning Application as they are now PUBLIC documents and should therefore be available and accessible on this portal. The number of comments now stands at 23. The fact that this is NOT the case is extremely disturbing, particularly as this Planning Application has become so contentious. I understand more comments regarding the case were sent to Lewisham Planning after the Public Meeting held on 5th October. Some objectors received no confirmation that their comments had been received. The minutes of the Public Meeting were to be sent to attendees within two weeks. They are now 4 days overdue. The 120 objectors for Blackheath Hill Residents Group/Parkside/The Hospital + Business tenants would like an explanation. COVID-19 aside, this shows a lack of process and transparency. the documents are now in the public domain and should be available for all to see. It is unacceptable.

Kind regards



To: Lewisham Planning Service  
Patrycja Ploch

**Property Ref: LE/144/78B/TP**  
**Planning application: DC/20/117309**

I am writing as a local resident to object to the development proposed by GS8/VABEL on the current site of the Blackheath Business Estate. [REDACTED]

[REDACTED] I wish to object due to the following issues.

I ask you to reject the current planning application due to its:

**1. Failure to consult local community and stakeholders, and to implement measures outlined in the proposed development's SCI document.**

The public consultation outlined in this application's SCI document (29<sup>th</sup> July 2020) states that although only 5 people attended the consultation event in December 2019, full consultation was undertaken. A map shows where 300 letters were said to be delivered, my home is included on this map but I received no such letter. I have asked several neighbours along my street and they do not remember the letter either. By the SCI document's own admittance, the number of attendees at the December consultation for a development of this size was extremely low. Both this event, and the zoom event this year only had 5 attendees.

However, the number of local residents currently objecting after having become aware of the proposals, suggests that had the consultation carried out prior to this failed to engage stakeholders/the local community. In addition the SCI does not mention consulting with the existing businesses on the site (*see 2. Executive Summary*) while it does suggest that "Wide ranging engagement ranged from councillors to residents and business owners who had equal say..." (*see 3. Consultation Methodology*). Business owners objecting to the process now, argue that they were never contacted by the developer or the team carrying out the consultation. The applicants should be required to carry out proper consultation before submitting their proposals.

**2. Adverse impact on, and loss of existing local businesses.** These are challenging times for local business and the council is committed to supporting local enterprise in this area as outlined in The Lewisham Business Growth Strategy 2015-2022. Lewisham's strategy for micro-business is very positive but this development threatens the future of such businesses.

Local businesses on the site who were not adequately consulted have been advised verbally that they will be given the option to move into the new commercial space once they have been built, however there is no information of how this offer will work in practice. If the site were being retained and developed and binding assurances were given to local businesses this might be feasible but there is no mention of this in the SCI documents. Local businesses, already struggling due to the effects of the current pandemic, economic downturn and fall in consumer activity are unlikely to survive moving to temporary premises while their current premises are demolished, and may not be able to afford the terms of this new accommodation. I ask Lewisham Council, which is committed to support local businesses and employment, to consider the likelihood of the existing businesses being lost to the area as a result of this development, and to review this matter in line with

the commitments they have made.

- 3. Increases in pollution and traffic congestion.** During the construction phase of this development the only entry point for construction traffic will be on Blackheath Hill, this could lead to additional congestion on this road. Traffic on the hill is already solid during the day and evenings. It has just increased due to the residential road closures on the Greenwich side of the A2, which is pushing even local traffic back onto this A2. MPs Janet Daby and Vicky Foxcroft held a meeting about traffic calming measures earlier this week due to Lewisham residents' concerns, one aspect being the increased pollution levels perceived by residents living near the main arterial roads choked by new increases in traffic. These traffic calming measures could be made permanent.

The volume of traffic has also visibly increased due to motorists avoiding public transport in response to the pandemic. Lorries and dumper trucks from the Supersewer works are already putting a huge strain on this stretch of road (100 lorries a day). Further lorries turning in and out of a narrow entrance on Blackheath Hill, a steep hill which narrows to a single lane at this point, will make the traffic worse and cause further idling of engines and particulates from vehicle brakes as well as particulates from petrol/diesel. The A2 is a Red Route and one of the main roads out of London and local residents are already being exposed to higher than average levels of pollution. This proposal will add to the density of traffic derived pollution particulates, add to the traffic jams and idling engines which already a major issue for the health of local residents.

Despite these facts the evidence on the impacts of the proposed construction on congestion and pollution are inadequate. It appears that traffic levels 'could have been' at a reduced level during their survey, the likely outcome of a survey conducted during the Covid-19 lockdown. A survey done at this time would be wholly inaccurate and therefore invalid. Other data provided by Air Quality Consultants appears to have based most findings from past data rather than carrying out up to date tests. The issues of congestion, air and noise pollution have not been adequately addressed despite the fact that we know that Blackheath Hill has already been declared one of the most polluted areas kerbside (see: Friends of the Earth - 2020 Local Authority Air Quality Annual Status Reports; also report to the EU on exceeding limit values in Nitrogen Concentrations for the annual mean limits and the Greater London Urban Area).

- 4. Subsidence on Blackheath Hill.** In 2002 a 6m gap opened up at the bottom of Blackheath Hill due to the 15<sup>th</sup> century chalk mines that are underneath. Local homes did not have to be demolished (as feared) at the bottom of the hill, as the problem was resolved there. However heavy drilling and development higher up where the current business estate is located, may lead to some of the same issue happening again. The risk presented by deep piling and bore holes to structural integrity of adjoining housing needs to be fully explored before granting approval of the planning application.

Thank you for considering my objection.

Yours sincerely



I would like to formally object to the proposed development of the Blackheath Business Centre site on the grounds that my property of [REDACTED] will be encroached and overlooked by the 10 storey residential block from the rear and the noise and constant disruption will impact my ability to work from home. I feel that Blackheath Hill already has plenty of new residential options and I would like to see the Blackheath Business Centre developers for low rise commercial use which would benefit existing residents and contribute to employment opportunities locally. There has been a lack of consultation over this development and I would genuinely like to see local views taken into account.

[REDACTED]



Dear Sir/Madam

I email to oppose the building of a 4 storey block of business units and two and eight storey blocks of flats on Blackheath Hill.

This development is not needed in this already densely populated area with its mix of social housing and small businesses.

I live near to Blackheath Hill and understand that Park Beekeeping is under threat with no security of tenure should this application be approved. Likewise on a small site, the development will block out light to the tenants living on the Parkside Estate.

I would also point out that the flats will overlook and invade the privacy of patients in the Blackheath Brain Injury & Neurodisability Centre and Cygnet Hospital. These patients deserve to be treated with respect and dignity.

I vehemently oppose/reject this planning application and hope the Council will refuse planning permission.

Regards



Dear Lewisham Planning Service

Property ref: LE/144/78B/TP

Our ref: DC/20/117309

I am writing to oppose the construction of the part seven/part nine storey building and four storey commercial space on the site of the Blackheath Business Estate.

The Blackheath Business Estate consists of 18 units. I have been a tenant of one of them for more than 10 years and some tenants on the estate have been here for more than 30 years. There is a complete lack of similar sized, similar usage properties in Lewisham and Greenwich. If this site is demolished, I see no other alternative that I, and the other businesses on the estate will have to leave the area and move our businesses out of London. Some other tenants fear if this site is demolished, they will have to shut their businesses for good.

I have listed below my concerns about the proposed plans but first I would like to highlight the behaviour of [REDACTED] and its owner [REDACTED] throughout the entire consultation process.

In November 2019, the current owner of the business estate emailed all tenants informing us that he had "*recently contracted with Vabel Blackheath Hill Ltd to sell the Blackheath Business Centre*". The email also said, "[REDACTED] may be making contact with you in the coming days to arrange a time to visit and introduce himself."

[REDACTED] did not contact any tenants. I first learnt that the estate was facing demolition when an employee of a consultancy who advises on affordable housing knocked on the door of my unit asking if she could come in and take photos of my space. It was she who told me the plan was to knock down the business estate, not [REDACTED]

In February 2020, a local resident emailed me a letter she had received inviting her to a "community workshop to give neighbours and members of the community to provide feedback on what they would like to see delivered on the site.". Again, it was a local resident who had to inform me of this. No one from [REDACTED] himself thought to invite the very tenants whose business estate would be demolished to the workshop.

In April 2020, the same local resident sent me another letter she had received from [REDACTED] inviting her to a virtual consultation about the proposed development to be held on Zoom on the 30th April. Again, no one from GS8 London informed any of the business estate tenants about this consultation. Thankfully the letter the resident had sent me had the meeting ID and password on it so I was able to join the meeting.

In the virtual consultation I asked [REDACTED] why he hadn't contacted any of the tenants of the estate about his plans. He said to me information had been sent to all tenants which is not true. He also said he was under the impression that current tenants had zero interest in remaining on the site. Again, this is not true. After the consultation I emailed [REDACTED] reemphasising my points. On the 4th May he then sent an email to all tenants detailing his plans and also adding "*I did hear from a couple of tenants, but I want to take this opportunity to apologise as I should have really followed up more diligently having not heard from the vast majority*" which to me means he hadn't in fact sent any information out to tenants.

Since then he has met local residents on the estate to go through his plans in more detail, but again [REDACTED] did not inform tenants of the estate about this. I've been quite shocked and angry at the complete lack of courtesy he has shown us as tenants. I appreciate he is a property developer and this is just another site to him, but to the other tenants, this estate is our livelihoods, and to not have the decency of telling us the site may be getting demolished is just not acceptable.

In his only email to tenants [REDACTED] did say we would have 'first priority' to the commercial space once work had been completed but this is purely paying lip service. No business is going to relocate as their current property is demolished, to then move back to the original site only two years later.

From what I gather it is not only tenants of the business estate that [REDACTED] have been poor at communicating with. The owners of the hospital next door have not received any information on the development, nor have many residents who live locally. At best [REDACTED] have been poor communicators, at worst they have gone about this process in a deceitful way. I would have thought that during the consultation phase [REDACTED] would want to have been open and honest with local residents and current tenants alike, informing us of their plans and communicating clearly to try and gain our support. My fear is that if [REDACTED] have behaved this way during the consultation phase, their behaviour and complete lack of respect for the local community will only be exacerbated if planning permission is granted.

Putting aside the demolition of the business estate, the building of 63 new flats would make more sense if there weren't already huge building projects going on in the immediate vicinity. In the past couple of years the Parkside block has been built and many of the flats within it are still unoccupied, added to this, almost 1400 flats are being built in the Heathside and Lethbridge development that the Blackheath Business Centre overlooks. I understand that there is a need for new housing to be built, but I don't think the site suggested is the best location for it.

There are other concerns I have about the proposed development, unconnected to my personal circumstances:

- **Blocking of natural light:** There is already a lack of light at one side of the Parkside development. GS8's proposed four storey commercial building will block out even more of Parkside's natural light. The images
- **Access for construction traffic:** The Heathside and Lethbridge development have been able to create an entry/exit point for lorries and other building machinery on the much quieter Lewisham Road. The Parkside Development did the same thing. The only entry/exit point for this proposed development will be on Blackheath Hill. Traffic is already solid up and down the hill between 8am and 7pm every day (and is far worse now with less people using public transport in recent months) - lorries turning in and out of the estate all day will make a heavily congested road even worse.
- **Impact on houses at entrance to the estate:** There are two houses at the entrance to the business estate. If the development goes ahead they will have to endure two years of the current site being demolished and then the 63 flats and commercial block being built - lorries and heavy machinery constantly going in and out of the tight entrance next to their house.

- **Impact on other parties:** It is not just the two houses who will have to endure all of the building work: It is inevitable that the hospital next door, the Parkside development and other residents who overlook the site will be heavily impacted.
- **Lack of parking for commercial block:** Other than disabled parking and two spaces for electric cars there will be no parking available on the new development, for either the residential or commercial blocks. It is simply not possible to have commercial units if the businesses have nowhere to park - the parking spaces currently here are key to each of the businesses on the site and having no parking available will make it hard to attract businesses to rent the property.
- **Entrance to the estate:** As I previously mentioned the entrance to the estate is quite tight - it is a sharp 90 degree turn in from Blackheath Hill and even drivers of cars have to go very slowly when turning into the driveway. There is no way of making this entrance any bigger as you have the border of the hospital site on one side and the two houses on the other side. It just does not seem feasible that large lorries will be able to come in and out of this entrance constantly. A point was also made to me that if a nine storey building is to be built on this site, large fire engines will need to be able to access the site in case of a fire and they will not be able to enter through the entrance as it currently stands.
- **Subsidence on Blackheath Hill.** There are 15th Century chalk mines underneath Blackheath Hill. A six metre gap opened up at the bottom of the hill in 2002 and there was fear then that local homes would have to be demolished. (<https://www.standard.co.uk/news/the-biggest-hole-in-the-road-yet-6299203.html>) These issues may have been sorted out at the bottom of the hill but heavy drilling and development higher up the hill where the business estate is located could lead to the same issue happening again, leading to potentially very dangerous scenarios for local residents.

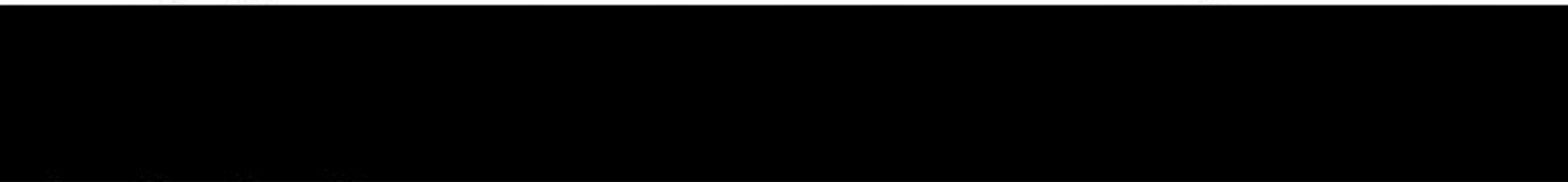


**From:** planningpa@lewisham.gov.uk  
**Sent:** 17 Aug 2020 12:58:04 +0100  
**To:** Planning  
**Subject:** Comments for Planning Application DC/20/117309

## Comments summary

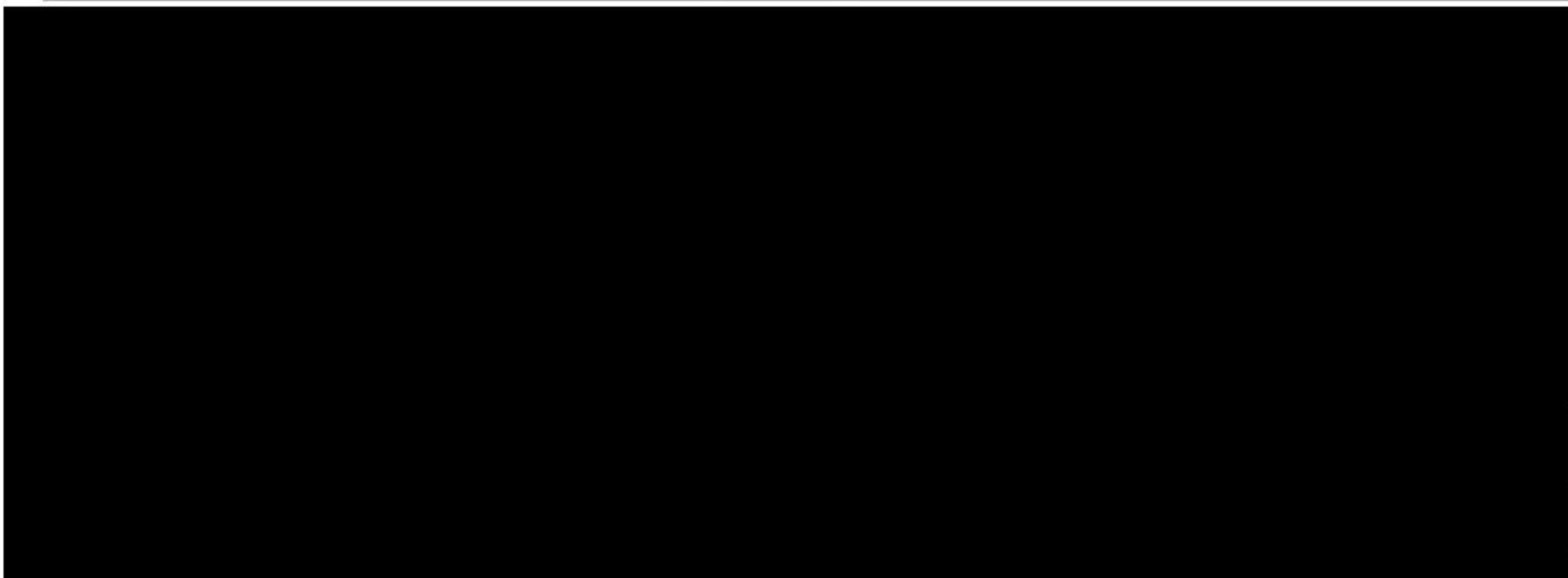
Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.



### Application Summary

Address:	BLACKHEATH BUSINESS ESTATE, BLACKHEATH HILL, LONDON, SE10 8BA
Proposal:	The construction of a part seven/part nine storey building on the site of Blackheath Business Estate, Blackheath Hill SE10 to provide 31, one bed 24, two bed and 8, three bedroom self-contained flats and a four storey building to provide 2288 sqm <sup>2</sup> commercial space, together with disabled parking, cycle parking, play space, refuse storage and plant.



### Comments Details

Commenter Type:	Neighbour
Stance:	Customer objects to the Planning Application
Reasons for comment:	
Comments:	<p>I have received no notice of this development until very recently. There has been no consultation i'm aware of, and i have not been contracted by the developer at any time. We received no leaflet or invitation to consultations.</p> <p>The proposals are out of scale and unsuitable, and will have a detrimental affect on local infrastructure. The development is seriously out of scale for a very small site.</p>



Hollymount close already suffers extensive parking intrusion and, and with no parking facilities for a 63 unit plus commercial development, this problem will be exacerbated. There is no assessment on how domestic (food and online shopping) private courier deliveries will be made. They will end up parking on either our property, or on the hospital's property.

The development includes a basement, and there has been no basement impact assessment done and no indication on how the installation of the basement might adversely affect neighbouring property.

Construction method statement is missing

---

Kind regards



London Borough of Lewisham,  
Planning Department,  
Laurence House,  
1, Catford Road, London SE6 4RU

12<sup>th</sup> August 2020

Dear Sirs,

**Property Reference LE/144/78B/TP**

**We refer to the above proposal to redevelop this Industrial Estate by Developers known as GS8 & Vabel. Our wish is to object to these proposals in the strongest possible terms. This is a Developer who has not even had the courtesy to contact us but has found time to circulate others and to hold meetings here with local people not connected with this Industrial Estate. This is unacceptable**

Established in 1985, we have occupied premises here for 27 years and have established a unique business which is the only one of its' type in London. This Industrial Estate is also unique. Not only do we supply Beekeepers throughout the United Kingdom, but we supply the greatly increased numbers of Beekeepers now keeping bees in London. Also now expanding considerably, are shops whom we supply and local people coming in to buy Local Honey in which we specialise. There is no other such facility locally. Our visitors book shows that people visit us from many overseas Countries. In 2017/8 we completed a full honey processing plant in St Lucia. Additionally, we are the only business in the United Kingdom to have design registered frames, patented product and other items unique to us.

**We will address the Summary of the Developers proposals:**

- 1      100% increase in existing floor space. *This is very concentrated in a 4 storey area very close indeed to the adjacent Parkside & Lethbridge Housing complex. Surely their residents will be very concerned regarding their restricted view when trees are not in leaf.*
- 2      Zero Waste Energy: *100% increase in floor space will increase the footfall creating more waste, increased traffic and where would people working here park their cars? Blackheath Hill has a severe traffic problem already and resultant pollution from Cars and commercial traffic.*

**Quality Supplies**

**Vat No. GB 830 4154 62**

- 3 **Commercial Advisory Group:** *Is there really the need for the 'Brunch Lunch' type facility outlined on an Industrial Estate? Again, where would Customers park Their cars especially with presumably Children occupying some of the flats at the end of the Industrial Estate.*
- 4 **Expected to create 100 Jobs:** *So, where would they expect these people to park their Cars or other means of transport. We cannot see how 100 working people could fit on to this relatively small Industrial Estate?*
- 5 **£10,000.00 in bursaries:** *While not dismissing this, the benefit proposed would need more explanation to ensure viability.*
- 6 **63 new high-quality residential dwellings:** *With the very high numbers of properties in the Lethbridge, Parkside and Peabody development under construction in Lewisham Road, is there not an 'over kill' in terms of housing in this relatively small vicinity? Demolition & construction would greatly increase traffic on a road already stretched to the limits.*
- 7 **High Quality Landscape by London Glades Ltd.,** *whilst we all like comfortable environment. The sketches provided by the Developer whilst glossy for the purpose, are questionable as to whether they can be achieved as shown.*
- 8 **Monthly Community Market & Seasonal Events:** *Is this really practical in what is an Industrial Estate. Oil and water can never mix. Where would people park and live in the flats would surely be disrupted. Also, they would be in competition with the weekly Blackheath Farmers Market and the Market in central Greenwich both locations which are very close by.*
- 9 **Renewable Energy:** *clearly a benefit if technical details can be successfully addressed.*

#### General Comments

- A In putting their proposals forward, the Developer has tried to cast this Industrial Estate in the most unfavourable light. All windows & doors in the units are double glazed and the Estate is well maintained by [REDACTED], Parking is adequate and large lorries 7.5T, 18T, 26T & even a 40ft Container recently have managed to deliver. The Industrial Estate is well maintained by the owner Nullpost Ltd.,
- B **The Developer has not bothered** taken the trouble to Contact us. They have the nerve in a letter to say that they have a good reputation but in reality have tended to concentrate on discussing their proposals mainly with parties well away from the Industrial Estate. They held a Zoom conference call to talk to 'interested' local residents but failed to advise us of this opportunity.
- C **Is it really possible to combine an Industrial Estate with vehicles calling on a regular basis and having flats with Children playing outside as Children do. You cannot keep Children locked up in a flat for very long. An Industrial Estate is not the place for Children to live in any case.**
- D Many commercial business premises in this Borough and adjacent Boroughs have been lost to housing. All except one unit on this Estate are occupied and where would we all go if the Estate is allowed to be redeveloped. In our case, we are unable to relocate and the business would shut after 35 years. Beekeepers, especially beginners are often in need of the right advice and this important facility would also be lost.

#### Conclusion


**If you strip away the gloss of the Developers presentation, there is little left and an Industrial Estate is not the place to combine with housing. If this application fails, there is an Organisation waiting to purchase that provides accommodation for Small Business and will not create the upheaval these Developers will cause.**

## Conclusion Continued

There is also the very important point of access for Emergency Services including the Fire Brigade. It is questionable if the current access would be acceptable for the Emergency Services.

We oppose in the strongest possible terms the Developers proposals which we consider to be seriously flawed.





I have already contacted you by mail and email on behalf of Hollymount Close Residents Association concerning the above planning application. I do so now in a personal capacity.

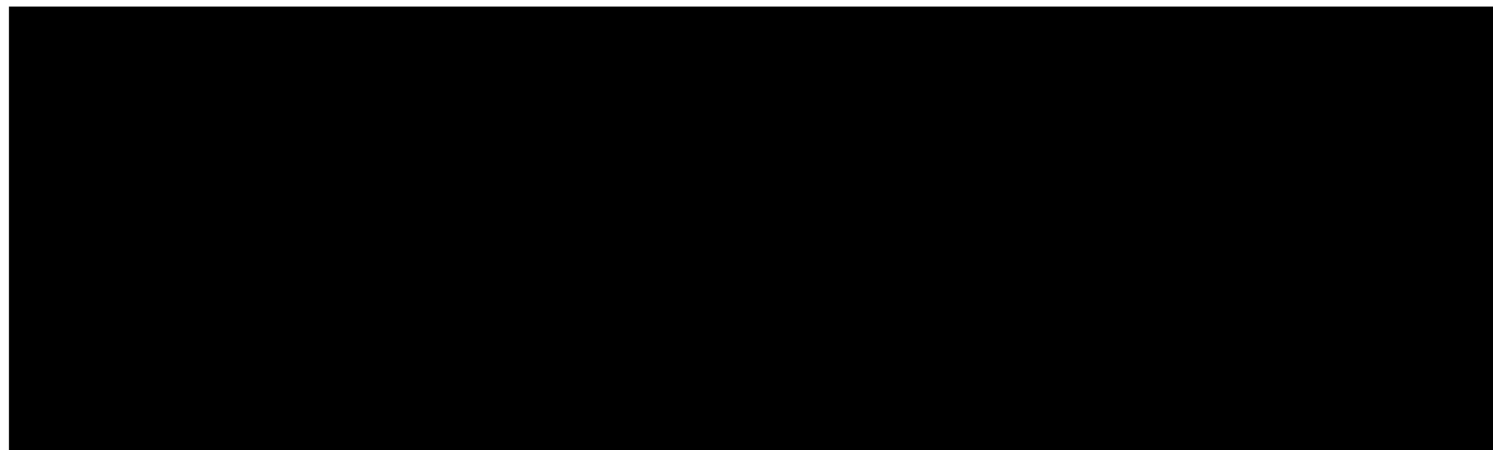
Many aspects of this proposal are disturbing, but I wish to focus now on the potential detriment to the health and well-being of tenants at Parkside, whose ability to enjoy their living space will be severely damaged by the proposed development.

As you will readily see I am not such a resident and my objection cannot be dismissed on the grounds of self-interest. These tenants do not have a strong voice and I believe that it is incumbent on us all to speak up for them.

The removal of the trees, and the replacement of them with the wall of commercial units, is unacceptable: it would be unconscionable of Lewisham Council to approve this.

Thank you for considering this letter, together with the objection recorded by my neighbours in Hollymount Close.

Yours sincerely



To whom it may concern,

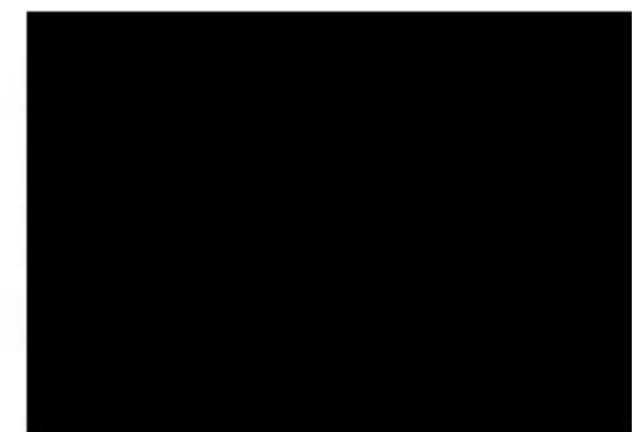
In relation to Application No: DC/20/117309

As a local resident I do not feel sufficiently notified or consulted on this proposed development and would please request further consultation with local residents based on a number of objections.

Regardless of the roof-garden(s) the height of the blocks as proposed, makes them both intrusive, overpowering and out of scale, particularly given the close proximity of the hospital complex and adjacent residential buildings on Blackheath Hill. The maximum height of the Hospital buildings is three storeys. None of the surrounding buildings, including Parkside, appear higher than five storeys at the entrance of the proposed site at street level.

There are also material concerns in relation to the density of population, buildings and subsequently traffic that this would create in an already dense area.

Many thanks for your consideration.



## **FOR THE ATTENTION OF PLANNING OFFICER PATRYCJA PLOCH**

**Property Reference LE/144/78B/TP**

**Your Ref: DC/20/117309**

**Re: GS8/VABEL Planning Application for:**

***The construction of a part seven/part nine storey building on the site of Blackheath Business Estate, Blackheath Hill SE10 to provide 31, one bed 24, two bed and 8, three bedroom self-contained flats and a four storey building to provide 2288 sqm2 commercial space, together with disabled parking, cycle parking, play space, refuse storage and plant.***

This formal objection letter is in addition to the objection letter submitted by [REDACTED] of which we wanted to acknowledge and consent to adding our names to due to the thoroughness of the response and sharing the same concerns. Please note that we concur with the content of that objection and for the purpose of not repeating the whole correspondence will focus primarily on our chief concerns in this letter. We also believe the concerns of the Blackheath Brain Injury Rehabilitation Centre and Cygnet Hospital to be of the utmost importance – knowing that the residents are particularly vulnerable members of society. And wish to second the concerns that they have raised in their own objection letter which we have also viewed.

### **1. Consultation**

**1.1** We refute the claim made in section 1:10 of the Statement of Community Involvement compiled by Newington Consultants on behalf of GS8/Vabel, and consider that they have not met the requirements of the National Planning Policy Framework with regard to Plan Making, or seriously heeded guidelines for Maintaining Effective Co-operation and Pre-Application Engagement and Front-Loading.

We recognise that GS8/Vabel have made some efforts to engage with the local community, however, there has never been a meaningful and on-going dialogue with those residents and house holders who would be directly affected. The so-called ‘targeted resident stakeholder presentations’ were perfunctory and many residents were excluded through lack of information/invitation.

Referring to Lichfieldsweb site for updated explanatory guidance of Government Memoranda on Planning updates, we noted temporary regulations stating that

*“..views of local people about the potential impact of development in their area helps to ensure that decision-makers have relevant information to allow them to reach a sound decision.”*

In addition the explanatory memorandum emphasises that these amendments are

*“not about cutting corners or excluding certain groups.”*

GS8 state that three thousand fliers were distributed throughout the local area prior to their Public Consultation Meeting at Parkside Community Centre in December 2019. Having now seen a copy of the flier online within the Planning Application documents, we note that the information regarding what the workshop was about was unclear.

The vast majority of residents on our list of supporters did not receive an invitation or a flier however, we understand that residents as far away as Point Hill and the Ashburnham Triangle were contacted through various means, so perhaps few fliers remained available for residents living directly next to the site.

What is the minimum number of responders required to satisfy Community Involvement awareness? This needs to be addressed considering that GS8/Vabel quote 5 residents in attendance at the Public Consultation Meeting - as a result of 3000 leaflets being distributed.

[REDACTED] which will certainly be impacted by the development and building works – I can confirm that we did not receive an invitation to a public consultation. And therefore believe that the consultation was not sufficient enough in scope.

**1.2** We understand that LPA's are encouraged to post site notices where the potential impact of a planning application is likely to generate a large volume of representatives and that they can also allot this responsibility to the applicant with advice to take a photograph on the day of the first posting as evidence of the display. These should then be placed on or near the site for a period of 21 days. We have not seen any evidence of Site Notices and/or posters pertaining to this application in or near the site, therefore we would ask who was allocated the responsibility for ensuring that this was carried out in accordance with procedure.

[REDACTED] – I can also confirm we have not seen any evidence of this kind and believe it is likely not to have happened. As a result we lacked knowledge of the proposed works until plans were already in place.

**1.3** Improved, pro-active communication strategies during the pre-planning stage would have attracted a greater number of attendees to their Public Meeting and, perhaps, Zoom presentations fostering a more democratic process of community involvement whilst facilitating a balanced exchange of ideas and concerns from the onset to establish more effective ongoing engagement.

We challenge GS8/Vabel's assumption that low attendance showed lack of interest.



In the Conclusion section of their Statement of Community Involvement (pp 13) with regard to:

- a) *"Very low attendance at the public meeting"*
- b) *"Very little substantive feedback by members of the local community"*

The reasons given by GS8/Vabel are questionable:

- *"relatively few residential properties have a close geographical relationship with the site, which may reduce interest"*
- *"low levels of public interest may suggest that the proposals are not controversial"*

There are over 110 households presently adjacent to this site, not including the Hospital in-patients and staff.

This objection letter alone is evidence of the local community's considerable concerns regarding a controversial range of issues from within this Planning Application that will have a serious impact upon their homes, lives, well-being and be detrimental to their neighbourhood.

For whatever reason, the fact that local residents in proximity to the site, do not seem to have reacted to GS8/Vabel's original public consultation documents or meetings **does not necessarily imply a lack of local interest or due concern**, as stated in their Planning Application, but a failure of communication. The impact of Covid-19 on normal engagement obviously has not helped along with changes to local planning regulations issued by the government and adopted by LPA's since March 2019.

[REDACTED] which will certainly be impacted by the development and building works – I can confirm that we were not invited to public consultation – as a result our voices and objections have not been aired – and the above statements are not acceptable to us – that there was low attendance or interest by the local community when in fact there was not enough effort made to alert the closest neighbours of the intended works.

## 2. Proposed Residential Accommodation

### 2.1 Construction of two residential blocks of flats 7 and 9 storeys, plus roof-gardens.

If approved, we strongly object to the overall height of the two blocks, which should be reduced to the maximum height of the buildings in the immediate vicinity as they appear, viewed kerbside, at the entrance of the proposed site on Blackheath Hill - that is **5 storeys**.

This is a key concern for us – currently our views are uninterrupted trees and sky – a looming tower behind the brain injury centre will drastically alter our views, being a large contributing

factor to our decision to buy the property. This will without doubt impact our mental health – and damage the value of our property.

**3.4** Regardless of the roof-garden(s) the height of the blocks as proposed, makes them both intrusive, overpowering and out of scale, particularly given the close proximity of the hospital complex and adjacent residential buildings on Blackheath Hill. The maximum height of the Hospital buildings is three storeys. None of the surrounding buildings, including Parkside, **appear higher than five storeys** at the entrance of the proposed site at street level.

Our concerns are as above and also the added impact of the skyline from the front of our building – a high rise is totally out of keeping with the current visual identity of Blackheath Hill from the road

#### **4 Impact on the Blackheath Brain Injury Rehabilitation Centre + Neurological Care Centre and Cygnet Hospital**

**4.1** It is worth noting that this facility is not a Clinic (or a Surgery) as stated in the planning proposal, but has both short and long-term residential patients with acute brain- injury and mental health and physical issues.

**4.2** Both residential blocks would be situated in very close proximity to and overlooking the Blackheath Brain Injury Unit and Cygnet Hospital. Patients in the hospital have serious physical and psychological conditions whilst others are recovering from brain injury and neurological disorders. Being overlooked both in terms of patient and staff rooms as well as treatment rooms and outdoor recreation areas will be disturbing for both patients and residents of the blocks alike.

The NPPF (2019) clearly states in section 182 that:

*“existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.”*

**4.3** The Brain Injury Rehabilitation Centre & Neurological Care Centre is located at the rear of the Hospital complex and closest to the two residential blocks. They are extremely concerned with the overshadowing aspect of both blocks causing a loss of light. The physical presence of such a large block is intimidating, causing anxiety and serious repercussions to patients. We do not believe the provision of vision control glazing will sufficiently mitigate patients’ feelings of being overlooked and overwhelmed.

The psychological welfare of the residents as disclosed above is a concern of ours – Thinking of the impact it will have on ourselves as residents I can only imagine it will be far more distressing for this group of people – and this doesn’t seem to have been given due consideration. If the development was of a more appropriate scale and was not of a residential nature this would be something we would be happy to accept but it feels completely overwhelming for the space and location.

## 5 Four Storey Commercial Business Units

5.1 Replanting trees/ shrubs elsewhere on their proposed development will not compensate tenants of Block D Parkside for their loss of this vital 9 metre high tree barrier, a green curtain that provides a sense of space, light and nature and more importantly acts in the capture of particulate matter.

This will also impact us as residents as [REDACTED] as the current trees act as a barrier to the hospital – this is already not totally effective but at an acceptable level – with a further number of stories above the canopy being proposed there is likely to be a significant level of noise and light pollution at night, and a loss of sunlight through our south facing windows during the day

## 6 Access: Health & Safety Issues

6.1 This is an extremely small site (0.315 hectares) for mixed residential/commercial use. The density of buildings proposed, including the provision of a small 90 sq. metre playspace, electric re-charging bays and turning place for commercial vehicles **adjacent to each other**, we believe is potentially dangerous and a Health and Safety hazard. The movement of residents, including families, visitors and vehicles negotiating entrance/exit from the site is problematic and requires further investigation.

6.2 Access for waste collection and emergency vehicles, particularly in case of fire on any part of the site, is an issue for both the site and hospital complex. With reference to the New Metric Handbook, Planning and Design Data (Edited by Patricia Tutt and David Adler), the section on vehicles states that a medium size fire engine and medium size refuse/re-cycling truck have a width of 3.1m (including wing mirrors). The entrance to the proposed site is only 3.8m which could potentially create problems for emergency and other large vehicles trying to access the site whilst residents/visitors also negotiate entry and exit by foot or cycle.

Presumably, these concerns have been considered by Lewisham Fire Service, Health & Safety Executives and Huntercombe Group. Could we have details of their findings?

Parking is already a considerable issue for us residents at [REDACTED] we have a permitted residents car park and already are trying to rectify issues with the hospital, visitors and staff who wrongly park in our car park. I can only imagine that as your site does not include accommodations for parking this will exacerbate the issue.

## 7. Pollution Issues

7.1 NPPF 180 *“Planning Policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including accumulative*

*effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development."*

This includes adverse impacts resulting from noise from the new development - and noise giving rise to significant adverse impacts on health and the quality of life. (180a).

The impact of noise has particular significance for extremely ill in-patients in the Hospital and residents in Block D who use their walkways as a balcony for peace and fresh air as well as a means of socialising with neighbours. Residents on Blackheath Hill who also wish to enjoy the peace and quiet of their gardens, balconies and terraces would also be directly affected.

**7.2** We could see no reference to **Fixed Plant Noise Control**, which we consider may cause a nuisance to residents in Parkside Block D from the Business Block and Hospital patients and staff emitting from the 2 Residential Blocks. Have these been addressed by determining noise levels at the facade of the nearest noise sensitive properties mentioned above? Can we please have clarification as to whether this has been done and, if so, that it is in accordance too BS4142:2014.

The noise and disruption this project will cause is deeply concerning to us – we already suffer enough noise pollution from the road on Blackheath hill – and in current circumstances many residents will now be working from home – the work will cause continual disruption to residents for 2 years – we were not consulted or invited to comment on this until now and would like to understand how this will be managed?

**7.3** NPPF (180c) also refers to the impact of light pollution from artificial light on local amenities, intrinsically dark landscapes and nature conservation. It is well documented that artificial light in the night environment has an adverse impact on humans, birds and other wildlife.

As previously mentioned the light will also shine directly into our windows at night as the building will go above the tree canopy – this is another issue that will affect our wellbeing on a daily basis and could again reduce the value of our property which does not currently suffer from this issue.

## **9. Parking**

Mr Spencer assured us that he will enter into a S106 agreement with Lewisham Council/Parking, which will mean none of the residents will be able to have parking permits for the BHA Zone and there will be an obligation on GS8, as the developer, to specifically state this when selling the flats. However, the concern for the Hospital and local residents is that, through change of circumstances, new residents may want to acquire a vehicle at a later date and because there is no provision for parking on site or in the BHA Zone, could seek to park illegally at the entrance to Blackheath Brain

Injury Unit and Neurological Centre or in the car park belonging to residents of [REDACTED] which already happens.

This has become an issue for the Hospital as patients can quickly become ill and the Hospital Director has had to take action as vehicles have blocked emergency ambulances from accessing their site. The same situation could occur if visitors to the proposed Business Centre arrive by car to find there are no parking facilities. We therefore wish to seek assurances that GS8/Vabel's parking regulations will be properly monitored and enforced.

We also seek assurance from Lewisham Council/Parking that the S106 agreement with GS8/Vabel will be upheld and whether a time limit has been set. We understand that Hollymount Close Residents Association have made reference to this concern in their own letter of objection.

As mentioned previously our residents car park is already adversely impacted by surrounding businesses – with insufficient provisions – a residential block without parking feels totally inappropriate and unrealistic.

**In summary, we feel that the plans do not represent the best interests of the local residents and that further discussions and amends should be made to plans with the consultation of residents who were excluded from original consultations. The height and visual impact of the building is a primary concern and will leave a lasting impact on the wellbeing of residents, the value of their properties, and the local vista. We implore the council to reconsider these plans to be more accommodating to local people and to regenerate the business park for the best of all involved.**

Signed,

[REDACTED]

[Redacted]

Kind regards,

[Redacted]

On 31 Jul 2020, at 14:18, Planning <[Planning@lewisham.gov.uk](mailto:Planning@lewisham.gov.uk)> wrote:

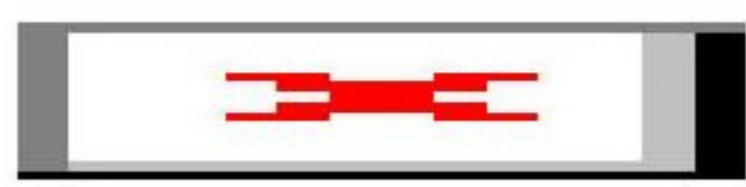
Dear [Redacted]

Thank you for submitting your comments on the above case file. In order for us to register these comments we will need your full address. We can assure you that we are GDPR compliant and all information given will only be used for this purpose only.

Kind Regards,

LBL Planning Team  
London Borough Of Lewisham Planning Department  
5th Floor, Laurence House, Catford, SE6 4RU

**We are able to offer a choice of Planning Advice Services before submitting a planning application. Please access this webpage link**<https://www.lewisham.gov.uk/myservices/planning/apply-for-planning-permission/get-planning-advice/Pages/default.aspx>



[Redacted]

**To:** Planning

**Subject:** Re: Acolaid Case DC/20/117309

Thank you - please see attached pictures to convey the density of traffic on Blackheath Hill - on a daily basis - it must be reduced and soon. It is a health risk to say the least. New buildings here will not help. Thank you again.

On 30 Jul 2020, at 16:20, [Planning@Lewisham.gov.uk](mailto:Planning@Lewisham.gov.uk) wrote:

\*\*\*\*\*

**DISCLAIMER**

This message is confidential and intended solely for the use of the individual or entity it is addressed to. If you have received it in error, please contact the sender and delete the e-mail. Please note that we may monitor and check emails to safeguard the Council network from viruses, hoax messages or other abuse of the Council's systems. To see the full version of this disclaimer please visit the following address: <http://www.lewisham.gov.uk/AboutThisSite/EmailDisclaimer.htm>

For advice and assistance about online security and protection from internet threats visit the "Get Safe Online" website at <http://www.getsafeonline.org>

---

**DISCLAIMER**

This message is confidential and intended solely for the use of the individual or entity it is addressed to. If you have received it in

error, please contact the sender and delete the e-mail. Please note that we may monitor and check emails to safeguard the Council network from viruses, hoax messages or other abuse of the Council's systems. To see the full version of this disclaimer please visit the following address: <http://www.lewisham.gov.uk/AboutThisSite/EmailDisclaimer.htm>

For advice and assistance about online security and protection from internet threats visit the "Get Safe Online" website at <http://www.getsafeonline.org>

Thank you for your response

[REDACTED]

Best,

Sebastian Shehadi

On Tue, Sep 1, 2020 at 2:14 PM Planning <[Planning@lewisham.gov.uk](mailto:Planning@lewisham.gov.uk)> wrote:

[REDACTED]

Thank you for your email. I am currently in the process of registering your comments on this planning application . In order to officially log these onto our system we require your full postal address. Please be assured that this information will be kept confidential in accordance with the new GDPR Act 2018.

Kind Regards,

LBL Planning Team  
London Borough Of Lewisham Planning Department  
2nd Floor, Civic Suite, Catford, SE6 4RU

**We are able to offer a choice of Planning Advice Services before submitting a planning application. Please access this webpage link [Get planning advice](#)**

General planning queries should be sent to [planning@lewisham.gov.uk](mailto:planning@lewisham.gov.uk)

Enquires or reporting an alleged breach of planning control (unauthorised development) should be sent to [planningenforcement@lewisham.gov.uk](mailto:planningenforcement@lewisham.gov.uk) or report it online and access further information [Unauthorised development](#)

*Any planning advice given by officers, either orally or in writing in the course of their duties, is offered in good faith and is based on the information/evidence provided. Advice is offered without the benefit of the involvement of other consultees (both internal and external), neighbours or other interested parties. Such advice is therefore the personal opinion of that officer and is not a formal decision of, nor are they binding on, the Local Planning Authority. The Local Planning Authority will only be bound where a formal application is submitted and a formal decision is issued in writing.*

---

[REDACTED]

**To:** Planning

**Subject:** for the attentio [REDACTED]

Application No: DC/20/117309

Hi,

I'm a resident of Blackheath Hill. I'd like to make a formal objection to the construction of a part seven/part nine storey building on the site of Blackheath Business Estate.

My main reasoning is as follows:

Regardless of the roof-garden(s) the height of the blocks as proposed, makes them both intrusive, overpowering and out of scale, particularly given the close proximity of the hospital complex and adjacent residential buildings on Blackheath Hill. The maximum height of the Hospital buildings is three storeys. None of the surrounding buildings, including Parkside, appear higher than five storeys at the entrance of the proposed site at street level.

Many thanks,

[REDACTED]





---

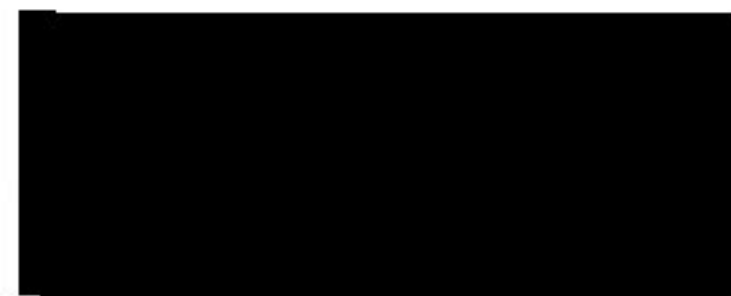
## DISCLAIMER

This message is confidential and intended solely for the use of the individual or entity it is addressed to. If you have received it in error, please contact the sender and delete the e-mail. Please note that we may monitor and check emails to safeguard the Council network from viruses, hoax messages or other abuse of the Council's systems. To see the full version of this disclaimer please visit the following address: <http://www.lewisham.gov.uk/AboutThisSite/EmailDisclaimer.htm>

For advice and assistance about online security and protection from internet threats visit the "Get Safe Online" website at <http://www.getsafeonline.org>

We would like to lodge an objection to this planning application on the basis of it's proposed height which we consider to be unreasonable, unsightly and out of keeping with the area. Regardless of the roof-garden(s) the height of the building as proposed, makes it both intrusive, overpowering and out of scale, particularly given the close proximity of the hospital complex and adjacent residential buildings on Blackheath Hill. The maximum height of the Hospital buildings is three storeys. None of the surrounding buildings, including Parkside, **appear higher than five storeys** at the entrance of the proposed site at street level.

Kind regards



GS8/Vabal Planning Application DC/20/117309

I wish to register my objection to the above proposals for the development of the Blackheath Business Park currently under consideration. My bedroom window is about 8 metres from the A2 and I have been subject to the toxic emissions from the growing number of vehicles that have been using the section of the A2 called Blackheath Hill for years. Much of that additional traffic has been due to the heavy vehicles servicing the various developments permitted by Lewisham Council Planning Department in that period. This initially included the rebuilding of Lewisham Town Centre and later the Parkside estate. With each new permitted redevelopment the area affected has been getting ever closer to my home until now the proposal to redevelop the Blackheath Business Park has brought it almost to my bedroom window.

This proposal also comes at a time when Greenwich Council has instituted a new traffic-flow plan which has diverted thousands of cars (according to their own estimate) from Greenwich Centre to Blackheath Hill and the proposal from [REDACTED] will make the situation even worse.

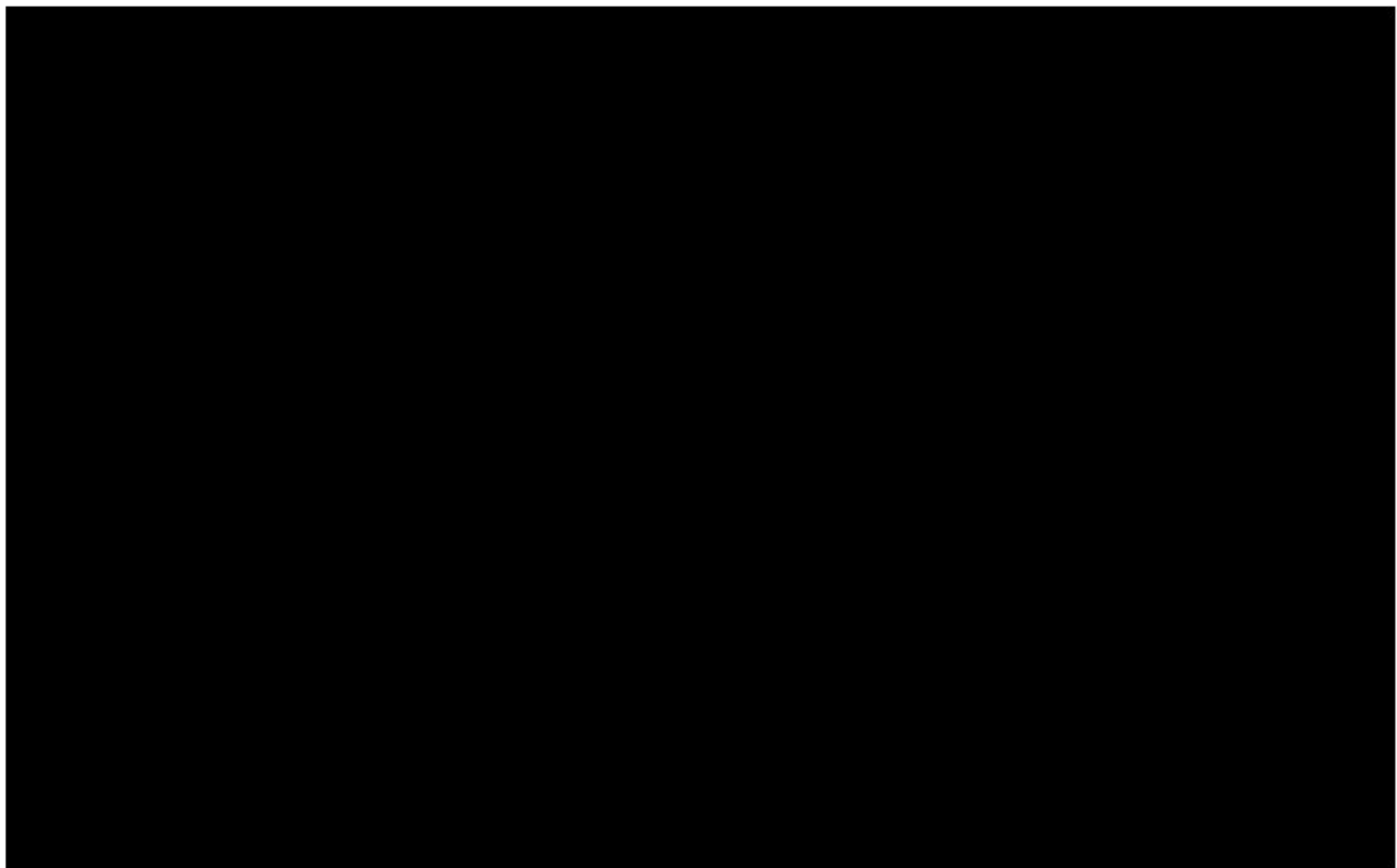
Any visitor to the area of Blackheath Hill that is relevant to this proposal can witness the sheer volume of traffic that is funnelled into one lane 8 metres from my home and could not but be appalled at the situation.

Since the beginning of the construction of these developments I have begun to suffer from a respiratory problem and am currently under the care of a respiratory specialist. I am 72 years of age and fear that the ongoing situation will actually cut short my life. In return for that I would hope that the very least those with the power to determine my future would visit the site during the hours of 8 to 10am or 3 to 7pm.

Yours sincerely



Planning Services,  
Laurence House,  
1 Catford Road,  
London SE6 4RU



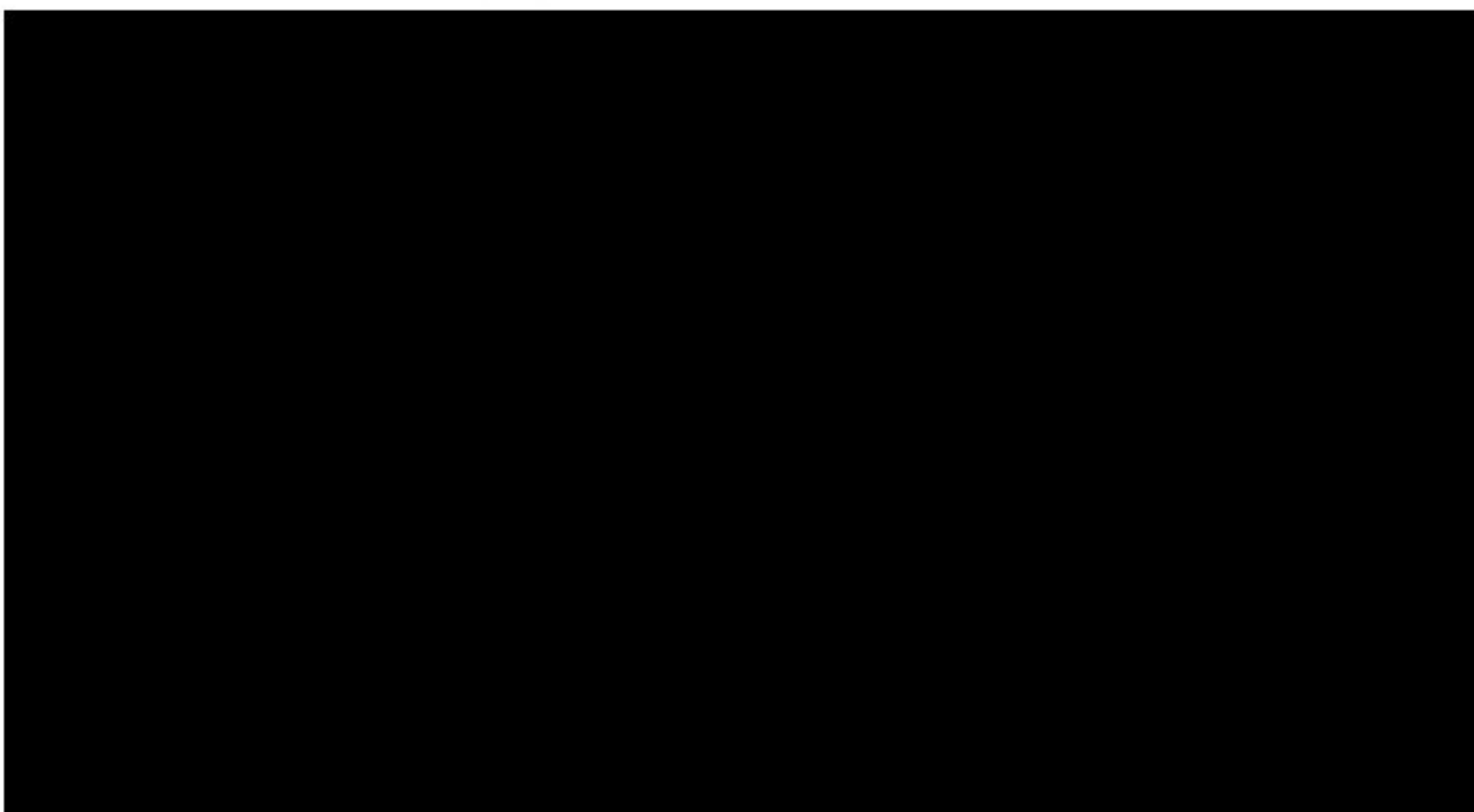
Dear Sirs,

Planning application LE/144/78B/TP  
Blackheath Business Estate

Since the above planning application will undoubtedly be passed by the council given its past record of ignoring valid objections viz. the orange box in Dartmouth Row, I have neither the time nor the will to enter into the many arguments that could be made against this development. Sufficient to say that we have a sufficient number of highly unattractive blocks of flats in the area and the density of this proposal is too great.

I predict the application will be approved.

Yours faithfully,



[REDACTED]  
Property Reference LE/144/78B/TP

Your Ref: DC/20/117309

Re: GS8/VABEL Planning Application for:

*The construction of a part seven/part nine storey building on the site of Blackheath Business Estate, Blackheath Hill SE10 to provide 31, one bed 24, two bed and 8, three bedroom self-contained flats and a four storey building to provide 2288 sqm2 commercial space, together with disabled parking, cycle parking, play space, refuse storage and plant.*

[REDACTED]  
Please accept this email as a formal objection to the proposed development of Blackheath Business Estate.

I believe the site needs to remain fully for commercial use, even more so given the impact of this year on jobs and the economy. Maintaining/increasing employment opportunities in this area would be incredibly valuable, and creating a little hub would bring more life to the area and go some way to address the higher-than-average unemployment in Lewisham.

However I strongly object to a 9 storey building being constructed behind my house. I don't believe GS8 have addressed our concerns about noise, privacy or the fact it will be an eyesore given the incongruous height in an area of 5 story buildings (at the most).

I must also dispute claims by GS8 that as residents living next to the site, we've been kept informed, or consulted. I never received any communication whatsoever about these plans. I attended a meeting on 20th May as a result of an invitation from my neighbour, which consisted of Mr Spencer arriving considerably late, showing a few slides and then neglecting to follow up with other resources as promised.

This is minor in the grand scheme of things but hardly points to a company who is engaging with the community as claimed, particularly as our property is so close to the site.

I've kept this brief for now but happy to elaborate if you need more information.

Many thanks,  
[REDACTED]



We strongly oppose to this proposal for the following reasons:

1. The developer had never contacted us or gave us any information. This is a key indication that they did not want to give us any information.
2. Do the height of the flats block the skyline of Blackheath ?
3. There are almost none other Light Industrial Units like Blackheath Business Estate in the area.
4. [REDACTED] only about 4 months ago and it would be a hassle to try and find another place like this and move our stock.
5. The entrance to Blackheath Business Centre is 3.8m and large delivery and container trucks that come in to the site have to reverse into the Business Centre meaning that it will block the main road.
6. There is not enough space for the building materials and equipment to build all three blocks on this small site.
7. There will only be a little amount of re-usable materials from old warehouses.
8. The government let me borrow £50,000 and the bank also let me borrow money to help my small business during the pandemic and now the proposal will destroy my business.
9. There is no need for electric charge if the residents don't have any cars.
10. Blackheath Business Centre is made up of 18 industrial units. Even though I am a small business, about every 3 months a 40ft container comes into the estate, delivery vehicles arrive daily and parking spaces are needed for customers and employees.
11. The current warehouses were built on rafters, maybe due to the area being on top of a chalk mine?
12. There is no provision for the current businesses in Blackheath Business Estate while the construction is taking place is a confirmation of their intention to change the use of the site.



We strongly object to this proposal on the following grounds:

1-The developer never contacted us or provided any information to us. It was clear that they were not keen to reveal any information to those most affected.

2-BBC comprises of 18 Light Industrial Units. If it is to function as it is they require constant access for delivery trucks, sometimes very large. The units require parking spaces for staff and customers/delivery vehicles. It employs people from within local area.

It is impractical/impossible to combine a Light Industrial Unit with residential apartments and certainly not suitable for families with children.

3-This proposal intends to surreptitiously change the use of the site to a residential apartments with shops (bakery, coffee shop) and perhaps fruit and veg. market ?? for the residents!!

4-There is real shortage in this area for Light Industrial Units.

5-Heathside and Lethbridge Estate (Peabody.org.uk)

Considering the 6 phases of this project (next to this site) provides 1396 residential apartments plus those already built in Blackheath Hill, there is no need to change the use of this site except for the purpose of making vast profit for the developer.

██████████ has been exporting from this site for the last 31 years and like most others would not be able to operate here if this proposal is accepted.

7-The entrance to this site is 3.8 meter and large delivery trucks and machineries needed for the site have to reverse into the site (past experience) thus constantly blocking the main road.

8-There is not enough space for the building materials and equipment to build three blocks on this small site.

9-Very little material will be re-usable from the old warehouses.

10-There has been two VERY SERIOUS subsidences so far:

-One in 2002 on Blackheath Hill that cost £8.2 million and evacuation of 110 people from their homes ([London.gov.uk/questions/2005/1787](http://London.gov.uk/questions/2005/1787)).

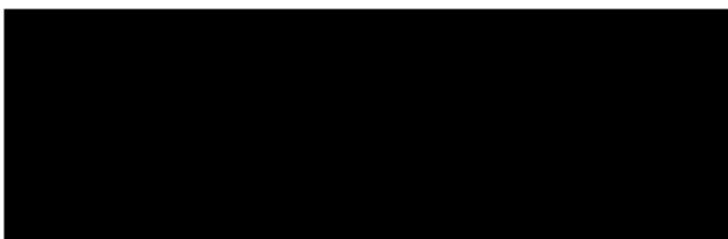
-Another along the driveway of BBC. Both were due to chalk mines. Blackheath is rich in chalk and there are many accounts of chalk mines ([londonist.com/2016/08/London-s-secret-caves](http://londonist.com/2016/08/London-s-secret-caves)).

11-The current warehouses were built on rafters, perhaps due to the area being on top of chalk mine.

12-There is no need for electric charge point if residents have no cars?

13-Does the block heights intrude in the skyline of Blackheath ?

14-The fact that there is no provision for current businesses while the construction is taking place is a confirmation of their intention to change the use of the site.





To: Lewisham Planning Service  
Patrycja Ploch

**Property Ref: LE/144/78B/TP**  
**Planning application: DC/20/117309**

I am writing as a local resident to object to the development proposed by GS8/VABEL on the current site of the Blackheath Business Estate. [REDACTED] just above the site in question, and I wish to object due to the following issues.

I ask you to reject the current planning application due to its:

**1. Failure to consult local community and stakeholders, and to implement measures outlined in the proposed development's SCI document.**

The public consultation outlined in this application's SCI document (29<sup>th</sup> July 2020) states that although only 5 people attended the consultation event in December 2019, full consultation was undertaken. A map shows where 300 letters were said to be delivered, my home is included on this map but I received no such letter. I have asked several neighbours along my street and they do not remember the letter either. By the SCI document's own admittance, the number of attendees at the December consultation for a development of this size was extremely low. Both this event, and the zoom event this year only had 5 attendees.

However, the number of local residents currently objecting after having become aware of the proposals, suggests that had the consultation carried out prior to this failed to engage stakeholders/the local community. In addition the SCI does not mention consulting with the existing businesses on the site (*see 2. Executive Summary*) while it does suggest that "Wide ranging engagement ranged from councillors to residents and business owners who had equal say..." (*see 3. Consultation Methodology*). Business owners objecting to the process now, argue that they were never contacted by the developer or the team carrying out the consultation. The applicants should be required to carry out proper consultation before submitting their proposals.

**2. Adverse impact on, and loss of existing local businesses.** These are challenging times for local business and the council is committed to supporting local enterprise in this area as outlined in The Lewisham Business Growth Strategy 2015-2022. Lewisham's strategy for micro-business is very positive but this development threatens the future of such businesses.

Local businesses on the site who were not adequately consulted have been advised verbally that they will be given the option to move into the new commercial space once they have been built, however there is no information of how this offer will work in practice. If the site were being retained and developed and binding assurances were given to local businesses this might be feasible but there is no mention of this in the SCI documents. Local businesses, already struggling due to the effects of the current pandemic, economic downturn and fall in consumer activity are unlikely to survive moving to temporary premises while their current premises are demolished, and may not be able to afford the terms of this new accommodation. I ask Lewisham Council, which is committed to support local businesses and employment, to consider the likelihood of the existing businesses being lost to the area as a result of this development, and to review this matter in line with

the commitments they have made.

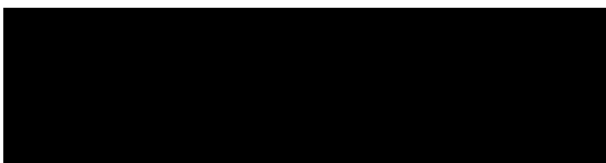
- 3. Increases in pollution and traffic congestion.** During the construction phase of this development the only entry point for construction traffic will be on Blackheath Hill, this could lead to additional congestion on this road. Traffic on the hill is already solid during the day and evenings. It has just increased due to the residential road closures on the Greenwich side of the A2, which is pushing even local traffic back onto this A2. MPs Janet Daby and Vicky Foxcroft held a meeting about traffic calming measures earlier this week due to Lewisham residents' concerns, one aspect being the increased pollution levels perceived by residents living near the main arterial roads choked by new increases in traffic. These traffic calming measures could be made permanent.

The volume of traffic has also visibly increased due to motorists avoiding public transport in response to the pandemic. Lorries and dumper trucks from the Supersewer works are already putting a huge strain on this stretch of road (100 lorries a day). Further lorries turning in and out of a narrow entrance on Blackheath Hill, a steep hill which narrows to a single lane at this point, will make the traffic worse and cause further idling of engines and particulates from vehicle brakes as well as particulates from petrol/diesel. The A2 is a Red Route and one of the main roads out of London and local residents are already being exposed to higher than average levels of pollution. This proposal will add to the density of traffic derived pollution particulates, add to the traffic jams and idling engines which already a major issue for the health of local residents.

Despite these facts the evidence on the impacts of the proposed construction on congestion and pollution are inadequate. It appears that traffic levels 'could have been' at a reduced level during their survey, the likely outcome of a survey conducted during the Covid-19 lockdown. A survey done at this time would be wholly inaccurate and therefore invalid. Other data provided by Air Quality Consultants appears to have based most findings from past data rather than carrying out up to date tests. The issues of congestion, air and noise pollution have not been adequately addressed despite the fact that we know that Blackheath Hill has already been declared one of the most polluted areas kerbside (see: Friends of the Earth - 2020 Local Authority Air Quality Annual Status Reports; also report to the EU on exceeding limit values in Nitrogen Concentrations for the annual mean limits and the Greater London Urban Area).

- 4. Subsidence on Blackheath Hill.** In 2002 a 6m gap opened up at the bottom of Blackheath Hill due to the 15<sup>th</sup> century chalk mines that are underneath. Local homes did not have to be demolished (as feared) at the bottom of the hill, as the problem was resolved there. However heavy drilling and development higher up where the current business estate is located, may lead to some of the same issue happening again. The risk presented by deep piling and bore holes to structural integrity of adjoining housing needs to be fully explored before granting approval of the planning application.

Thank you for considering my objection.



**To:** Planning@lewisham.gov.uk,  
**Subject:** FW: Planning Ref: DC/20/117309 Blackheath business Estate, Blackheath Hill  
**Attachments:** image001.png,

Hi Team,  
Please register this as a comment of concern for DC/20/117309.

London Borough of Lewisham | Housing, Regeneration and Environment | Planning Department |  
5<sup>th</sup> Floor Laurence House 1 Catford Road Catford SE6 4RU |

**From:** Planning  
**Sent:** 12 August 2020 10:52  
**Subject:** FW: Planning Ref: DC/20/117309  
**Importance:** High

**To:** Planning  
**Subject:** Planning Ref: DC/20/117309  
**Importance:** High

Hello

I email with reference to the GS8/VABEL Planning Application for the proposed development on the site of Blackheath Business Estate, Blackheath Hill SE10 to raise my significant concerns.

Can I begin by stating that I've received no correspondence from the planning department, Lewisham Council throughout the planning application process for the proposed development.

In order to give you some clarity, the hospital building and site is owned by The Huntercombe Group (THG). THG provides a specialist brain injury rehabilitation service on the ground floor. Cygnet healthcare provide hospital services from the first and second floor of the building. Cygnet occupy part of the hospital on a landlord and tenant agreement.

For the avoidance of doubt, I can categorically state that at no point during their application process have GS8 engaged with me as the representative of the landlord, or any of our patients as they clearly state in their application. I consider this to be of significant concern as their claim is untrue and misleading.

I would welcome an urgent response to my email, and consideration be given to an extension to this process in order that we can give due consideration in terms of our response to the planning application submitted by GS8.

Kind regards



FOR THE ATTENTION OF PLANNING OFFICER PATRYCJA PLOCH

**Property Reference LE/144/78B/TP**

**Your Ref: DC/20/117309**

**Re: GS8/VABEL Planning Application for:**

***The construction of a part seven/part nine storey building on the site of Blackheath Business Estate, Blackheath Hill SE10 to provide 31, one bed 24, two bed and 8, three bedroom self-contained flats and a four storey building to provide 2288sqm2 commercial space, together with disabled parking, cycle parking, play space, refuse storage and plant***

We support the contents of the formal objection letter sent to you on 26<sup>th</sup> August 2020 and request that you consider our own objections, outlined below:

**Proposed Residential Accommodation**

- Construction of two residential blocks of flats 7 and 9 storeys, plus roof-gardens.

We strongly object to the overall height of the two blocks, which should be reduced to the maximum height of the buildings in the immediate vicinity as they appear, viewed kerbside, at the entrance of the proposed site on Blackheath Hill - that is 5 storeys.

We are concerned to note that the planned roof gardens effectively add another storey to each block making them actually 8 and 10 storeys respectively.

We draw your attention to the fact that TFT, acting on behalf of Vabel in their Daylight/ Sunlight Report consistently refers (under 7, Proposed scheme) to:

*"a ten storey residential block on the southern part of the site"*

- GS8/Vabel Planning Statement, section 4.6 makes reference to

*"distinctive and useable roof gardens for communal and potentially managed public use"*.

We need clarification of the term 'public use' and how this will be managed, including their response to potential impact of noise and light pollution on the surrounding neighbourhood.

The positioning of the roof gardens on a nine and seven storey block with multiple use and being positioned in a built-up residential area that causes concern with regard to their potential to create noise that can travel some distance.

- Regardless of the roof-garden(s), the height of the blocks as proposed, makes them both intrusive, overpowering and out of scale, particularly given the close proximity of the hospital complex and adjacent residential buildings on Blackheath Hill. The maximum height of the Hospital buildings is three storeys. None of the surrounding buildings, including Parkside, appear higher than five storeys at the entrance of the proposed site at street level.
- In actuality, the two proposed residential blocks would appear larger in relation to buildings in proximity because of the topography of Blackheath Hill. The majority of Parkside blocks are 7 storeys in height with the exception of one building of 14 storeys (Block F), which is set back on a lower level with Lewisham Road in relation to the proposed site. Block F tower already appears intrusive and overbearing when viewed from properties adjacent to the site.
- In their Planning Statement 6.35, GS8/Vabel identify the Parkside Estate as the established precedent for the height of their proposed buildings and that

*"The (9 storey + roof garden) building will sit comfortably within an already established skyline."*

We feel this is inappropriate because whilst these two blocks will appear the same height/level as the Phase 6 buildings and Block F, these buildings are further away and lower down. The proposed new residential blocks are closer to Blackheath Hill and should be commensurate with the scale of the immediate surrounding buildings, topography and street scene, not the taller buildings.

The new Parkside Estate has only been part of the skyline for 10 years compared to the much older 'low-rise' properties and hospital on Blackheath Hill that have been the established skyline for decades, in some instances, for hundreds of years.

Setting Parkside as the precedent has the potential to create a domino effect - first GS8/Vabel with their proposed virtual 10 storey block, in turn creating another precedent for further creeping intensity of a high rise skyline through the Blackheath Gateway and onwards...

- In the Heritage Assessment (pp15 Fig.34) there is a section showing the proposed development and height relative to context viewed from Dartmouth Row. However, there is an omission in so far as there is no comparable drawing showing the proposed development and height relative to houses on Blackheath Hill and (Hospital). More specifically, there is a missing key view to deal with potential impact on the listed houses on Blackheath Hill (nos.106-108). This was also noted by The Blackheath Society. The two Tower Blocks will impact on the sky line, especially from the rear of the properties.
- We are extremely concerned that if the hospital site ever became available for future development, as indicated in GS8/Vabel's Planning Application, the current proposal would set a precedent for further high rise buildings, which would encroach even further upon the existing properties that include gardens, balconies, roof-gardens and street scene on Blackheath Hill and might adversely affect the Site of Interest for Nature Conservation (SINC).

NPPF (2019) Achieving Appropriate Densities, 122 that states:

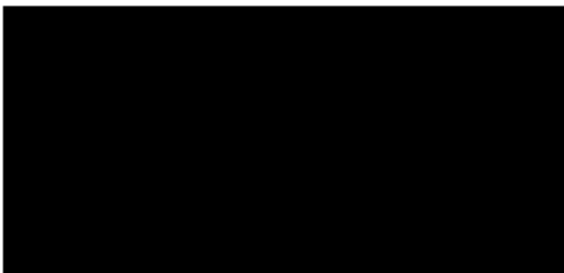
*"Planning policies and decisions should support development that makes effective use of the land, taking into account:*

*The desirability of maintaining an area's prevailing character and setting (including residential gardens)"*

- Apparently the tallest residential block will be level with the tree canopy to the South East of the site parallel with Morden Lane. In the 6 months during autumn and winter, when this tree canopy masking the development is bare, the two blocks will be even more visible and oppressive to a greater number of properties in the immediate area. Parkside residents commented that they value the vista of trees and perceived space on the bank of Morden Lane throughout the year, which will be obliterated by the erection of two tall residential blocks.
- With regard to Mobile Telecommunication Equipment we seek assurance that NO telecommunications equipment shall be erected on the external surface of ANY building in the development.

We seek further reassurance that Satellite Dishes/Antennae to be erected and installed on buildings on the site are approved by the appropriate authorities and these consist of a central dish or aerial system for receiving all broadcasts for residential/business units.

We request that you take these considerations and objections into account when considering the planning application.



Dear Patrycja,

I am a residents at 108 Blackheath Hill.

I am writing regarding the GS8/Vabal Planning Application DC/20117309. I would like to express my objection to the proposed plans, which I feel have not been properly consulted with myself or many of my neighbours.

On Blackheath Hill we are bombarded with environmental noise and pollution on a daily basis, from the A2 road and now with incessant building work at the back. We find it hard to get much quiet in the house from the noise out back or from the road up front. Furthermore, the light pollution coming from the building sites and then the buildings themselves also affect our peace at night – it is very hard to get bedrooms completely dark (on hot days we need to keep our windows open) while in winter when the tree canopies as gone the flood of light invades though the blinds.

The blocks of flats proposed in this planning application add to a plethora of other recent blocks, all of which increasingly add to the noise and light pollution while also not being in keeping in any shape or form with the older part of the Hill.

Our gardens are increasingly and anonymously overlooked from great height removing any sense of privacy. The latter is now persistently affecting many of our wellbeing, especially as we are mostly required to undertake substantial professional duties from home, while also sharing household spaces with the rest of the family. The houses and the tiny gardens we have are the only escape with have.

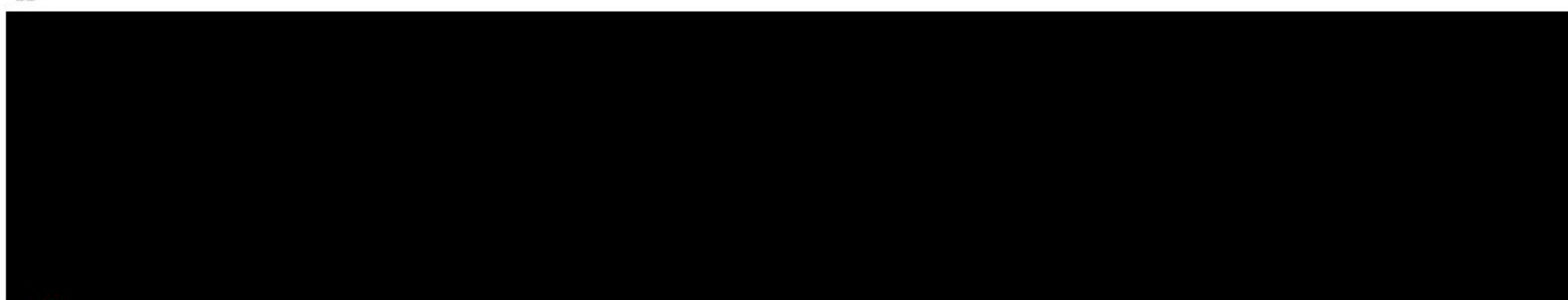
The lockdown and the uncertainty associated with the current pandemic has highlighted the essential nature of those spaces and the ability for people not to have to live on top of each other, so that they can be as productive and healthy (both physically and mentally) as possible. The high rise development proposed risks increasing the sense of enclosure further, depriving many of the little light and quiet that we are able to get here already. I suspect the issues I list here will be affecting also those gaining property in the newly built houses proposed.

Although I am very supportive of constructing more affordable houses for people living in London, the approach taken in this application seems very covert and brute force. The application shows little in the way of sensitivity to the established environment and its long term inhabitants who have worked hard for years to make this neighbourhood the best it can be. We have historic examples of the dire consequences to people's and neighbourhoods of such insensitive brutalist approaches in our immediate proximity in Depfort in the 1960s – a fate that I'd be keen to avoid for my neighbourhood.

I sincerely hope that you will consider my objection.

Please do not hesitate to get in touch should you require any further information or comments from me.

--



We strongly oppose to this proposal for the following reasons:

1. The developer had never contacted us or gave us any information. This is a key indication that they did not want to give us any information.
2. Blackheath Business Centre is made up of 18 industrial units. Even though I am a small business, about every 3 months a 40ft container comes into the estate, delivery vehicles arrive daily and parking spaces are needed for customers and employees.
3. There are almost none other Light Industrial Units like Blackheath Business Estate in the area.
4. [REDACTED] only moved nearly a year ago and it would be a hassle to try and find another place like this and move our stock.
5. The entrance to Blackheath Business Centre is 3.8m and large delivery and container trucks that come in to the site have to reverse into the Business Centre meaning that it will block the main road.
6. There is not enough space for the building materials and equipment to build all three blocks on this small site.
7. There will only be a small amount of re-usable materials from old warehouses.
8. The government let me borrow £50,000 and the bank also let me borrow money to help my small business during the pandemic and now the proposal will destroy my business.
9. There is no need for electric charge if the residents don't have any cars.
10. Do the height of the flats block the skyline of Blackheath ?
11. The current warehouses were built on rafters, maybe due to the area being on top of a chalk mine?
12. There is no provision for the current businesses in Blackheath Business Estate while the construction is taking place is a confirmation of their intention to change the use of the site.







**\*\*Final and corrected submission (please ignore previous one) \*\***

To:

Planning Service SE6 4RU Ref:LE/144/78B/TP-DC/20/117309

Sub:Objection to GS8-Blackheath Business Centre proposal

We strongly object to this proposal on the following grounds:

1-The **developer never contacted us** nor provided any information to us. It was clear that they were not keen to reveal any information to those most affected. In this proposal there is no future for us at this site.

2-Blackheath Business Centre comprises of 18 **Light Industrial Units**. If it is to function as it is they require constant access for delivery trucks, sometimes very large. The units require parking spaces for staff and customers/delivery vehicles. It employs people from within local area.

It is **impractical/impossible to combine a Light Industrial Estate with residential apartments and certainly not suitable for families with children.**

3-This proposal intends to **surreptitiously change the use of this Light Industrial Estate to residential apartments with shops (bakery, coffee shop) and perhaps fruit and veg. market ?? for the residents!!** Ridiculous.

4-There is **real shortage** in this area for **Light Industrial Units**.

5-Heathside and Lethbridge Estate [REDACTED]  
Considering the 6 phases of this project (next to this site) provides **1396 residential apartments** plus those already built in Blackheath Hill, there is no need to change the use of this site except for the purpose of making vast profit for the developer.

6-[REDACTED] has been exporting from this site for the last 31 years and like most others would not be able to operate here if this proposal is accepted.

7-The entrance to this site is 3.8 meter and large delivery trucks and machineries needed for the site have to reverse into the site (past experience) thus constantly blocking the main road.

8-There is not enough space for the building materials and equipment to build three blocks on this small site.

9-Very little material will be re-usable from the old warehouses.

10-There has been **two VERY SERIOUS subsidences** so far:

-One in 2002 on **Blackheath Hill that cost £8.2 million** and **evacuation of 110 people** from their homes ([London.gov.uk/questions/2005/1787](https://www.london.gov.uk/questions/2005/1787) ).

-Another along the **driveway of Blackheath Business Centre**. Both were due to chalk mines. Blackheath is rich in chalk and there are many accounts of chalk mines ([londonist.com/2016/08/London-secret-caves](https://www.londonist.com/2016/08/London-secret-caves)).

11-The current warehouses were built on rafters, perhaps due to the area being on top of chalk mine.

12-There is no need for electric charge point if residents have no cars?

13-Does the block heights intrude in the skyline of Blackheath ?

14-The fact that there is no provision for current businesses while the construction is taking place is a confirmation of their intention to change the use of the site and that there is no future for us in this proposal.

[REDACTED]  
**To:** Planning@lewisham.gov.uk,

**Subject:** Patrycja Ploch

**Attachments:**

---

**FOR THE ATTENTION OF PLANNING OFFICER PATRYCJA PLOCH**

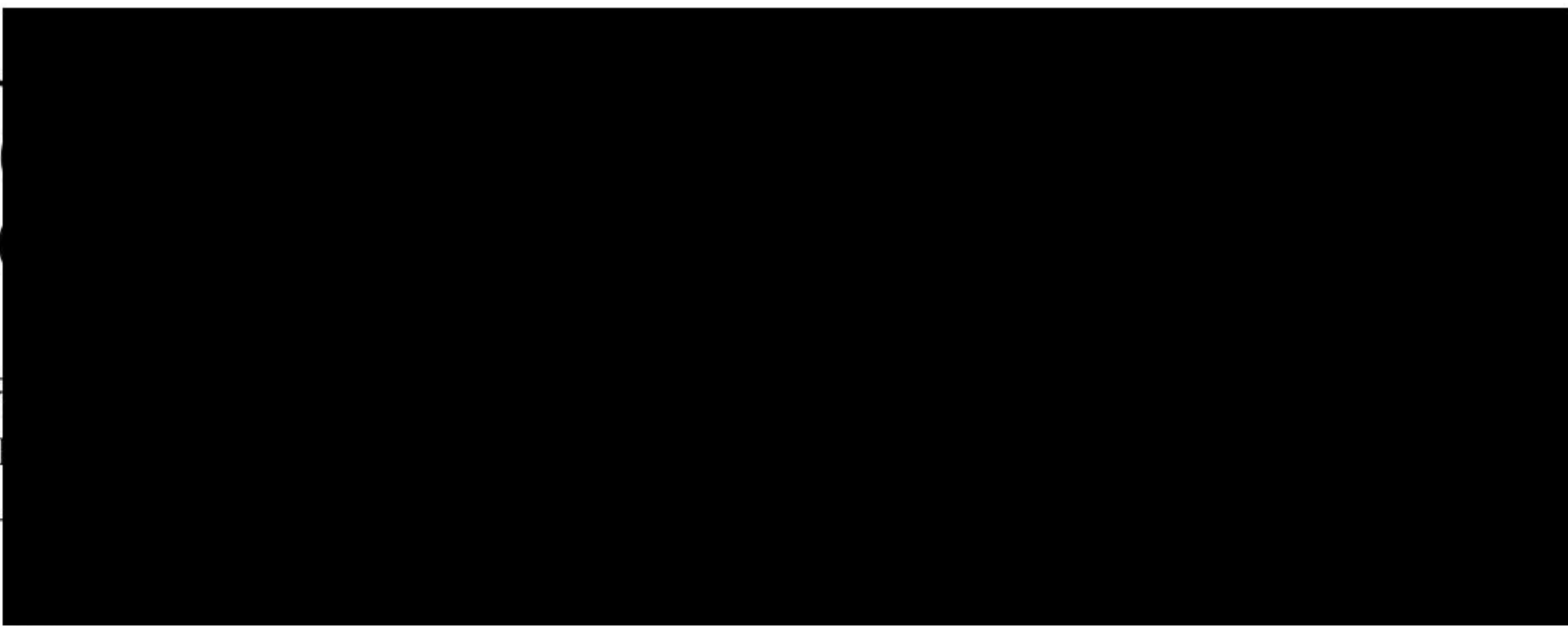
Property Reference LE/144/78B/TP

Your Ref: DC/20/117309

We have lived at Blackheath hill for many years and find it a very nice place to live.

Having read of your planning application I am writing to object strongly to these proposals.

1. **Overall height**
2. **Loss of privacy**
3. **Noise increase**
4. **Increase pollution**



[REDACTED]  
**To:** Planning@lewisham.gov.uk,

[REDACTED] Ref DC/20/117309

**Attachments:** Kalomart & Co Unit 9 Blackheath Business Centre - Application ref DC-20-117309.pdf,

---

Dear [REDACTED]

Hope this emails finds well and safe

Please find attached our comments in response to your recent correspondence to us in relation to the above subject matter.

Any queries please do not hesitate to contact me.

Thank you

[REDACTED]

This e-mail and any files transmitted with it are confidential. If you are not the intended recipient, any reading, printing, storage, disclosure, copying or any other action taken in respect of this e-mail is prohibited and may be unlawful. If you are not the intended recipient, please notify the sender immediately by using the reply function and then permanently delete what you have received.



Hi,

Reference was *Blackheath Business Estate* - 31 new flats to be built there.

On 29 Jul 2020, at 10:20, Planning <[Planning@lewisham.gov.uk](mailto:Planning@lewisham.gov.uk)> wrote:

Hi [REDACTED]  
Please can you quote the reference for the application, it will help to narrow down the search.  
Kind Regards,

LBL Planning Team  
London Borough Of Lewisham Planning Department  
5th Floor, Laurence House, Catford, SE6 4RU

**We are able to offer a choice of Planning Advice Services before submitting a planning application. Please access this webpage link**<https://www.lewisham.gov.uk/myservices/planning/apply-for-planning-permission/get-planning-advice/Pages/default.aspx>



[REDACTED]  
**To:** Planning  
**Subject:** Re: Blackheath Business Estate

On 27 Jul 2020, at 08:35, Planning <[Planning@lewisham.gov.uk](mailto:Planning@lewisham.gov.uk)> wrote:

Good Morning,  
Thank you for your comments.  
In order to register them correctly, please confirm your full postal address.  
Kind Regards,

LBL Planning Team  
London Borough Of Lewisham Planning Department  
5th Floor, Laurence House, Catford, SE6 4RU

[REDACTED]  
**To:** Planning  
**Subject:** REF: Blackheath Business Estate

Dear Sir/Madam,

**In reference to the planned application to construct further flats on Blackheath Hill to provide 31 flats.**

There is, as you know a growing problem with the amount of traffic on Blackheath Hill - since COVID 19 in particular - this road has only gotten busier and more congested. It is already a RED ROUTE on London's pollution map. Making it a severe health warning for local residents.

There are already a large number of property available along this road - namely the Parkside Estate - providing hundreds of flats - and still not yet complete.

Please, I would urge you to seriously consider the impact on the environment in what is already a very densely populated area. More flats along this route are not necessary nor desirable whatsoever.

With best wishes,

This message is confidential and intended solely for the use of the individual or entity it is addressed to. If you have received it in error, please contact the sender and delete the e-mail. Please note that we may monitor and check emails to safeguard the Council network from viruses, hoax messages or other abuse of the Council's systems. To see the full version of this disclaimer please visit the following address: <http://www.lewisham.gov.uk/AboutThisSite/EmailDisclaimer.htm>

For advice and assistance about online security and protection from internet threats visit the "Get Safe Online" website at <http://www.getsafeonline.org>

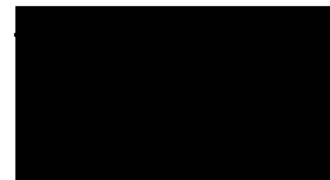
---

#### DISCLAIMER

This message is confidential and intended solely for the use of the individual or entity it is addressed to. If you have received it in error, please contact the sender and delete the e-mail. Please note that we may monitor and check emails to safeguard the Council network from viruses, hoax messages or other abuse of the Council's systems. To see the full version of this disclaimer please visit the following address: <http://www.lewisham.gov.uk/AboutThisSite/EmailDisclaimer.htm>

For advice and assistance about online security and protection from internet threats visit the "Get Safe Online" website at <http://www.getsafeonline.org>

I wish to strongly object to this proposal. The commercial unit is supposed to be 4 stories yet if you take into account the steep gradient of Blackheath Hill it will seem much higher and will block the light from my living room windows. I also feel that the area is already densely populated and this proposal can only have a derogatory effect on the environment.







Patrycja Ploch  
Lewisham Planning Department  
Laurence House 3<sup>rd</sup> Floor  
1 Catford Road  
Catford  
London  
SE6 4RU

Design Out Crime Office  
Bromley Police Station  
High Street,  
Bromley, Kent  
BR1 1ER.

Telephone: 020 8284 8889  
Email: david.gudgeon@met.police.uk

Your ref: DC/20/117309

Our ref: SE4189

Date: 28/07/2020

**Re: BLACKHEATH BUSINESS ESTATE, BLACKHEATH HILL, LONDON, SE10 8BA**

Dear Patrycja,

Thank you for your correspondence, allowing me to comment on planning application reference DC/20/117309 for **The construction of a part seven/part nine storey building on the site of Blackheath Business Estate, Blackheath Hill SE10 to provide 31, one bed 24, two bed and 8, three bedroom self-contained flats and a four storey building to provide 2288 sqm<sup>2</sup> commercial space, together with disabled parking, cycle parking, play space, refuse storage and plant. | BLACKHEATH BUSINESS ESTATE, BLACKHEATH HILL, LONDON, SE10 8BA**

Please note, Designing Out Crime Officers have met with the design team regarding this application, the meeting was well received and positive solutions were brought forth by both parties to address issues around the security of this development.

Having read through the Design and Access statement, I am pleased to see that Designing Out Crime Officers and Secured By Design is mentioned on pages 25 and 111-112.

The plans for this design are well thought out and changes that enhance the safety and security of the residents have been adopted.

Points that were raised include, but are not exhaustive to were:

The proposed plan lends itself to compartmentalisation of the building. This is so that residents and visitors only have access to the floor they reside and communal space. Adopting this measure greatly reduces anti-social behaviour and nuisance neighbours.

Ensuring cycle stores could only contain a maximum of seventy cycles to frustrate multiple bike theft.

Ensuring a suitable lighting plan was adopted for the site so that a uniform level of lighting is achieved and that bollard lighting was not used as it is prone to vandalism.

Ensuring that tested and accredited door sets and windows are installed across the development to ensure a good and constant level of security is in place to give residents piece of mind.

These points along with others were raised at the meeting between Designing Out Crime Officers and the design team. The meeting was positive and well received and minutes of this meeting have been agreed.

I feel this development needs to achieve the standards set out by SBD so a high and uniform level of security through the buildings and the associated landscaping is set.

Achieving Secured By Design should be welcomed, especially as this development is in a high crime area. Lewisham is a high crime borough it had the 15<sup>th</sup> highest recorded crime figures within London's 32 boroughs, suffering from incidents of Burglary, Robbery, Assaults including violent crime and knife crime, Criminal Damage, Motor Vehicle Crime, Theft, gang crime, and Anti-Social Behaviour including drugs. Blackheath ward had **1679 recorded crimes** in the year July 2019 to June 2020. Detailed crime figures are shown here <https://www.police.uk/metropolitan/00BEGP/crime/stats/> Within the crime types at the location are Anti-Social Behaviour, Violent and sexual offences, burglary, drug offences, criminal damage and arson, robbery, public order and robbery.

Looking at three year figures for the ward, violent and sexual offences and anti-social behaviour make up nearly 43% of all crimes in the area. (See Fig.1 below) At 8.5% over the three years the burglary figures for Blackheath ward are high compared to other parts of London, this is fuelled by the fact that this area is more affluent than other parts of London.

To assist the design team in achieving the correct standards under the relevant and appropriate guidelines. I recommend a meeting with them at the earliest convenience to discuss the scheme with a Design Out Crime Officer. This is important, especially given the guidance within NPPF sections 8 and 12 which state:-

**Section 8 of National Planning Policy Framework** states, 'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion...'

**Section 12 of National Planning Policy Framework** states, 'Planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.'

If this application is granted, I request that the development uses the Secured By Design principles and standards in respect of the security of each property. This is alongside continued consultation throughout the design and build of this development with the South East Designing Out Crime Office to ensure that Secured by Design standards are implemented correctly.

**This development is suitable to achieve Secured By Design accreditation I respectfully ask for the following conditions be met:**

- 1. Before any work above ground work hereby authorised begins, details of security measures shall be submitted and approved in writing by the Local Planning Authority and any such security measures shall be implemented prior to occupation in accordance with the approved details which shall be in line with the standards set out by 'Secured by Design'.**
- 2. Prior to the first occupation of the units hereby consented, confirmation that door and window products that meet the standard recommended by Secure by Design**

**for that building has been achieved shall be submitted to and approved in writing by the Local Planning Authority.**

I would encourage the planning authority to note the experience gained by the UK police service over the past 30 years in this specific subject area. That experience has led to the provision of a physical security requirement considered to be more consistent than that set out within Approved Document Q of the Building Regulations (England); specifically the recognition of products that have been tested to the relevant security standards but crucially are also fully certificated by an independent third party, accredited by UKAS (Notified Body). This provides assurance that products have been produced under a controlled manufacturing environment in accordance with the specifiers aims and minimises misrepresentation of the products by unscrupulous manufacturers/suppliers and leads to the delivery, on site, of a more secure product. For a complete explanation of certified products please refer to the Secured by Design guidance documents which can be found on the website [www.securedbydesign.com](http://www.securedbydesign.com) .

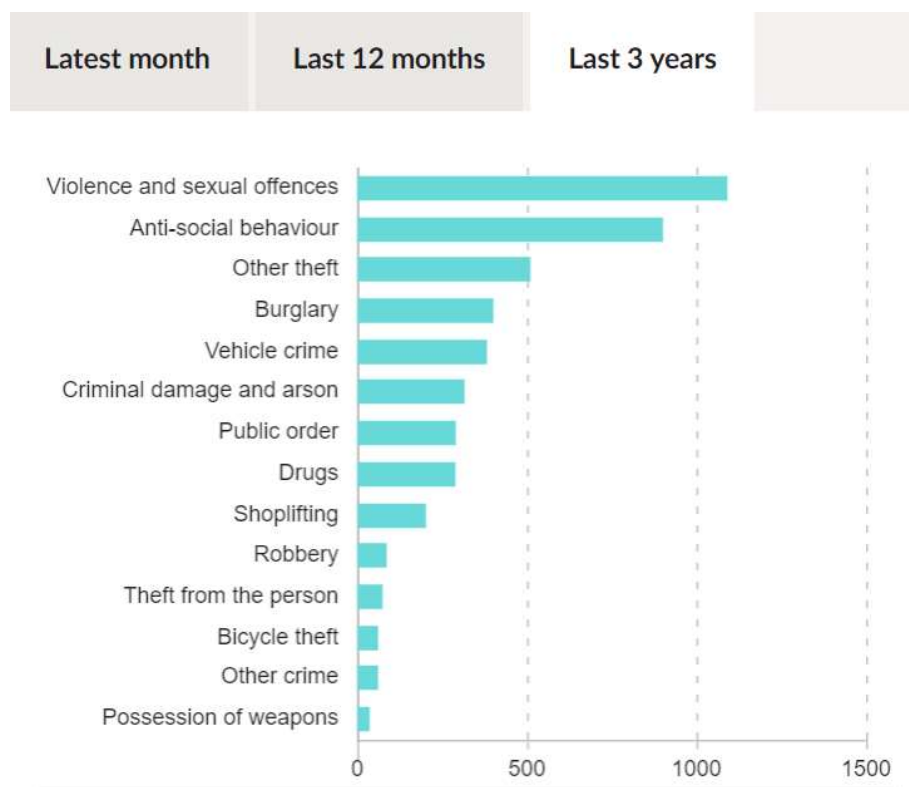
I feel that the benefits of certified products should be pointed out to applicants and that the Local Authority encourages applicants to achieve this more appropriate standard. It is also important to note that policies relating to the design and layout of a new development, which aim to reduce crime and disorder, remain unaffected.

I trust these comments are of assistance and I request to be kept informed as to the status of this development.

Yours sincerely,

**PC David Gudgeon - Designing Out Crime Officer**

**South East Design Out Crime Office**



***(Fig.1 Showing violent & Sexual offences and Anti-Social Behaviour make up almost 43% of all crime committed within Blackheath ward over a three year period, it also shows there is a high level of burglary as a percentage (8.5%) compared to other wards in London)***