

Motspur Park Gasholders Site, London

Metropolitan Open Land Assessment

Berkeley Homes (West London) Ltd

30 September 2025

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Contents

| | | |
|------------|------------------------------------------------|-----------|
| 1.0 | Introduction | 1 |
| 2.0 | Application Site and Proposal | 2 |
| | Site and Surroundings | 2 |
| | Planning History | 3 |
| | Metropolitan Open Land | 3 |
| | Other Designations | 5 |
| | Application Proposal | 6 |
| | Pre-Application Engagement | 7 |
| | Summary | 7 |
| 3.0 | MOL Planning Policy | 8 |
| | The Development Plan | 8 |
| | National Policy and Guidance | 9 |
| | Emerging Plans | 10 |
| | MOL Policy Considerations | 11 |
| 4.0 | The Site's Existing Contribution to MOL | 13 |
| | MOL Concept | 13 |
| | Site's Contribution to MOL | 13 |
| | Summary | 17 |
| 5.0 | Impact on MOL | 18 |
| | Spatial Effect on Openness | 18 |
| | Visual Effect on Openness | 21 |
| | Development Duration | 22 |
| | Remediability | 22 |
| | Activity | 22 |
| | Conclusion | 23 |
| 6.0 | Planning Benefits to MOL | 25 |
| | Social Benefits | 25 |

| | | |
|------------|------------------------|-----------|
| | Environmental Benefits | 25 |
| | Summary | 26 |
| 7.0 | Conclusions | 27 |

Figures

| | |
|------------------------------------------------------------------------------------|----|
| Figure 2.1 Site location plan including borough boundaries. | 2 |
| Figure 2.2. Site MOL Designation (Left: RBK; Right: LBM). | 4 |
| Figure 2.3 Wider MOL Designation. | 4 |
| Figure 2.4 Site Constraints Map. | 5 |
| Figure 2.5. Proposed Site Plans. | 6 |
| Figure 4.1 Parcels MOL 20, 21 and 22 in RBK's Greenbelt and MOL Assessment (2018). | 14 |
| Figure 4.2 Parcel 22 MOL Assessment. | 14 |
| Figure 4.3. KCS Policies Map Extract. | 16 |
| Figure 5.1. Surface Cover extent – Existing vs Proposed Site within MOL. | 19 |

Tables

| | |
|--------------------------------------------------------------------------------------|----|
| Table 5.1. Comparison of extent of built development of the MPG Site within the MOL. | 18 |
|--------------------------------------------------------------------------------------|----|

Appendices

Appendix 1 RBK Local Plan Site Assessments Early Engagement (Regulation 18) May 2019

Appendix 2 RBK Green Belt and Metropolitan Open Land Assessment (2018) - Parcel 22

Appendix 3 Metropolitan Open Land: Impact on Visual Openness Assessment (by Montagu Evans) and accompanying Motspur Park AVR1 and AVR 3 Images and Indicative Viewpoints Map

1.0 Introduction

- 1.1 This Metropolitan Open Land Assessment ('MOLA') has been prepared, on behalf of the Applicant, Berkeley Homes (West London) Ltd, to accompany a full planning application ('FPA') for the redevelopment of land in Motspur Park situated on South of West Barnes Lane and East of Southern Railway, KT3 6NG, the Motspur Gasholders site (the 'Site'), for the following:

“Demolition of existing gasholders and associated above ground structures/buildings and redevelopment to provide a residential development and ancillary residential facilities (C3 Use Class), together with associated works to the existing accesses and internal vehicular routes, new pedestrian and cycle routes, the provision of new publicly accessible open space, amenity space, hard and soft landscaping, cycle and car parking, works to the brook embankment, re-siting of some gas infrastructure, ground works and plant.

Cross boundary application:

RB Kingston: *demolition of existing gasholders and associated ground structures/buildings, construction of new residential development, works to the vehicle access onto Kingshill Avenue, internal vehicular access routes, cycle and car parking, new public realm, hard and soft landscaping, works to the brook embankment, re-siting of some gas infrastructure, ground works and plant.*

LB Merton: *works to vehicle access onto West Barnes Lane, including hard and soft landscaping and new public realm and associated ground works.”*

- 1.2 This MOLA has been prepared to provide an assessment of the effect of this application proposal on the openness of the MOL. It includes an assessment of the effect of the proposed development on the visual openness of the MOL by Montagu Evans. Lichfields is responsible for all other elements of the assessment within this report. The MOLA should be read alongside the plans, drawings and accompanying documents, in particular the Design and Access Statement and the Townscape and Visual Assessment, that form the FPA submission.

- 1.3 This MOLA is structured as follows:

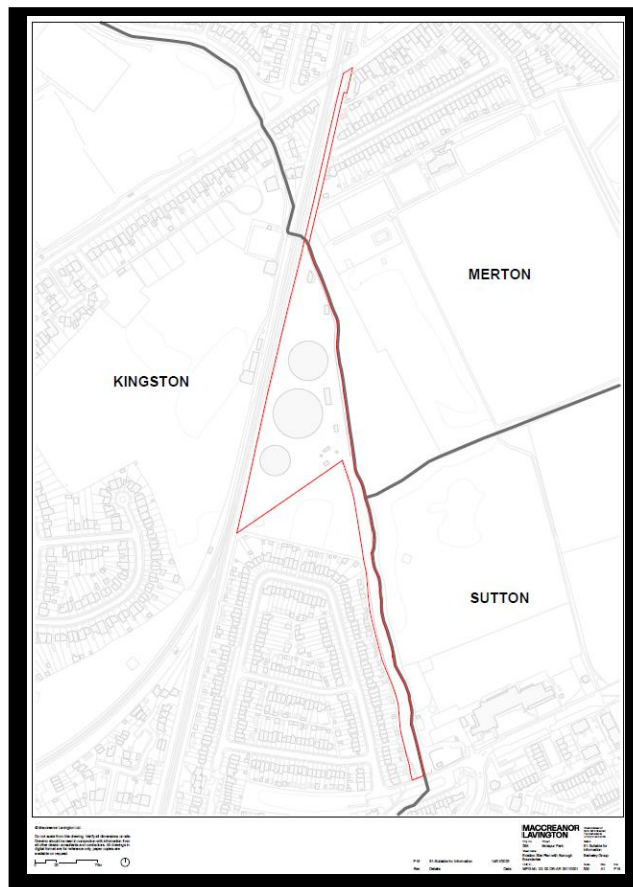
- 1 Introduction (this section)
- 2 Application Site and Proposal
- 3 MOL Planning Policy
- 4 Existing Site's Contribution to MOL
- 5 Impact on MOL
- 6 MOL Benefits
- 7 Conclusions

2.0 Application Site and Proposal

Site and Surroundings

- 2.1 The Motspur Park Gasholders ('MPG') Site is located between New Malden and Worcester Park town centres, principally within the Royal Borough of Kingston ('RBK') administrative area, adjacent to its eastern boundary with the London Borough of Merton ('LBM') (to the north) and the London Borough of Sutton ('LBS') (to the south) (Figure 2.1).

Figure 2.1 Site location plan including borough boundaries.



Source: Maccreanor Lavington

- 2.2 The 2.97ha MPG Site is a former utilities site (a Sui Generis use class) occupied by three redundant gasholders, 59m, 49m and 26m high, and associated gas infrastructure, including areas of hardstanding, comprising previous developed land ('PDL') with no public access.
- 2.3 The vast majority (2.83ha) of the Site falls within the Royal Borough of Kingston's ('RBK') administrative area, save for the northern access (0.14ha) which fall within the jurisdiction of the London Borough of Merton ('LBM').
- 2.4 The Site is accessed from two points: West Barnes Lane (in LBM) crosses the northern access some 250m north, close to Motspur Park railway station; and Kingshill Avenue (RBK) crosses to the south and on to Green Lane (in LBS).

- 2.5 The 2.30ha central part of the Site, comprising the residential development area, is contained by:
- the railway line to central London along its western boundary, adjacent to which lies the Fulham Football Club training ground;
 - Beverley Brook along its eastern boundary (flowing north-south), adjacent to which lies the Sir Joseph Hood Memorial Playing Field ('SJHMPF') park in LBM;
 - A Site of Importance for Nature Conservation ('SINC') adjoins to the south, beyond which lie allotments and the residential properties in Kingshill Avenue; and
 - To the north, adjacent to the northern access route, lie the residential properties in Marina Avenue, West Barnes Lane and Motspur Park.
- 2.6 The remaining 0.53ha of the Site within RBK area is occupied by the proposed southern access route.

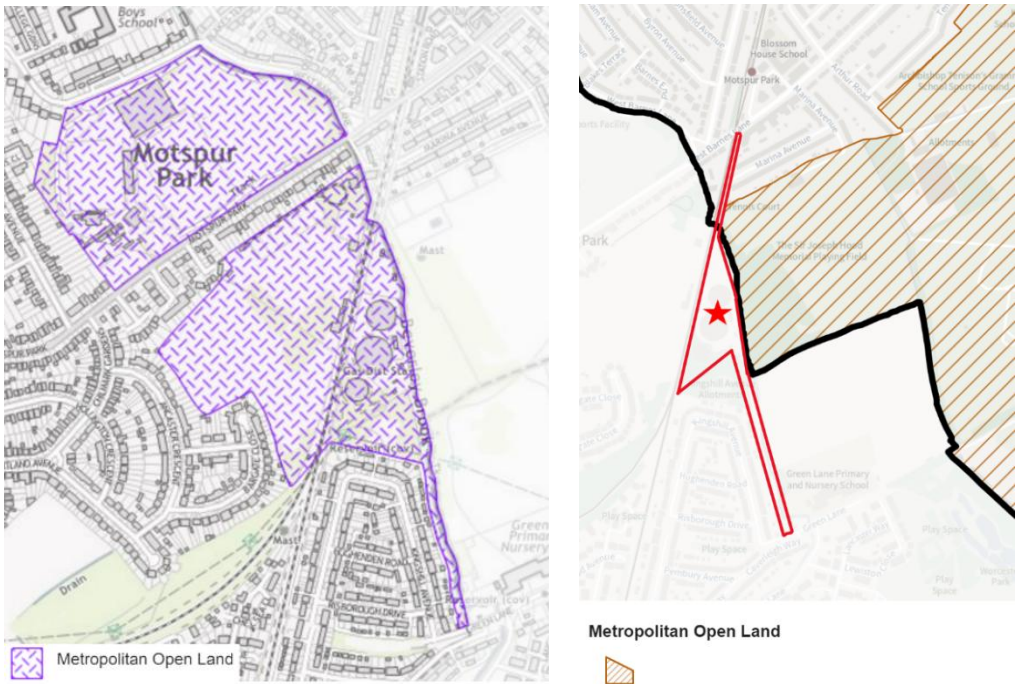
Planning History

- 2.7 The Site was established for gas production by the Wandsworth, Wimbledon and Epsom District Gas Company in 1924, with the three gas holders built in 1924, 1932 and 1954. The planning history of the Site reflects its former use (see Planning Statement Section 2.0 for further details).
- 2.8 The Site is owned by SGN (Scotia Gas Networks), a leading UK gas provider and distribution company, who acquired the Site when it was founded in 2005. Following years of upgrading gas infrastructure, including storing gas more efficiently in pipework underground, the Motspur Park gasholders were decommissioned by Ofgem in 2012. SGN is required by Ofgem to dismantle these and all redundant gasholders by 2029.

Metropolitan Open Land

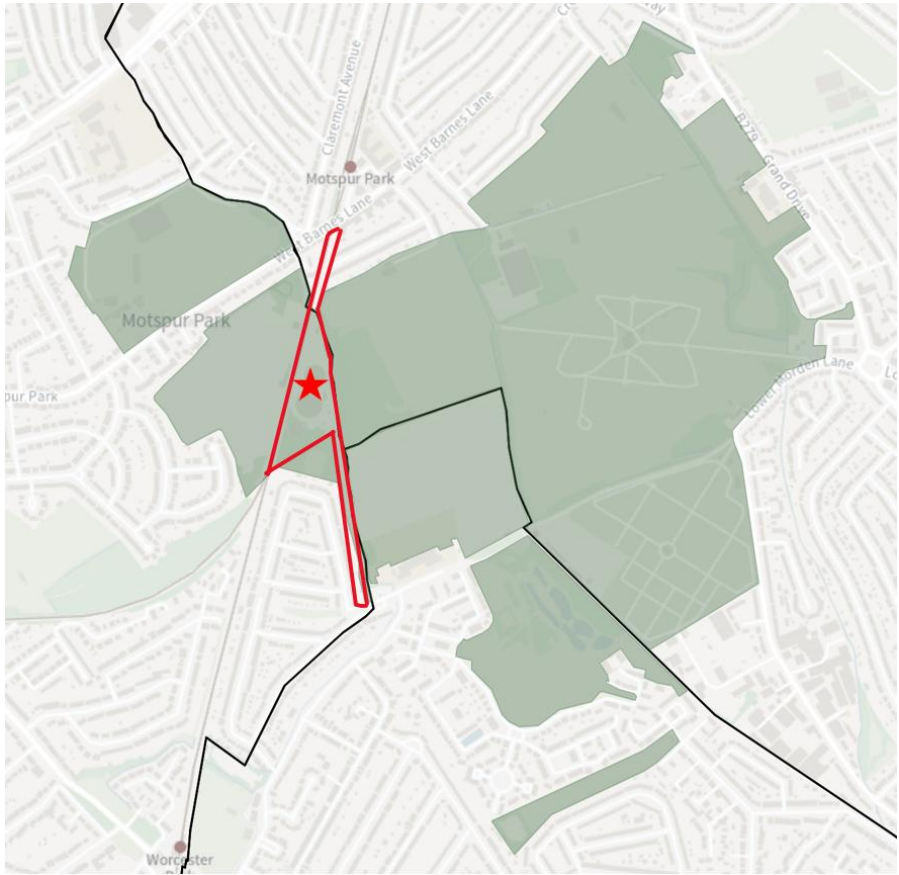
- 2.9 All 2.83ha of land within RBK lies within designated Metropolitan Open Land ('MOL'); the 0.14ha land in LBM lies outside the MOL (Figure 2.2).
- 2.10 The Site forms part of a wider swathe of MOL separating Motspur Park from Lower Morden and Raynes Park from Worcester Park, extending across the convergence of the borough boundaries of Kingston, Merton and Sutton (see Figure 2.3).

Figure 2.2. Site MOL Designation (Left: RBK; Right: LBM).



Source: Left: RBK Policies Map Extract (2012); Right: LBM Policies Map Extract (2024).

Figure 2.3 Wider MOL Designation.



Source: London Datastore, GLA (2025).

Other Designations

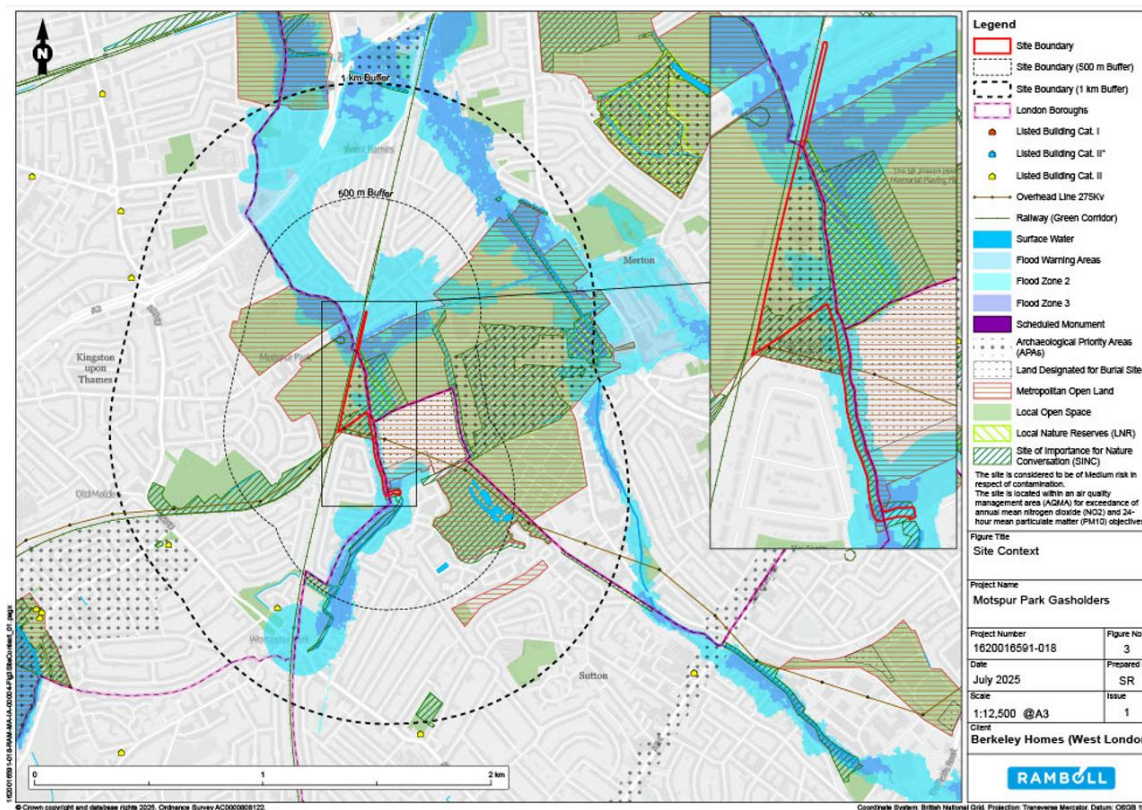
2.11 Other policy designations applying to the Site, in addition to MOL, are also identified on the Site Designations Map (Figure 2.4):

- Green Chain/Walk London Network;
- Green Corridor, running the railway line to the west (within RBK) and including the northern access route (within LBM);
- Site of Importance for Nature Conservations ('SINC') - Beverley Brook & southern part of main site (as well as the Kingshill Avenue allotments adjoining the Site);
- Partially within Flood Zones 2/3;
- Critical Drainage Area; and
- Archaeological Priority Area - Tier 2.

2.12 The Site also lies near the:

- Green Corridor - Sir Joseph Hood Memorial Playing Field ('SJHMPF') park (within LBM);
- Sir Joseph Hood Local Nature Reserve ('LNR') and SINC, on the eastern boundary (also within LBM); and
- Manor Park SINC, 100m to the southwest (within RBK).

Figure 2.4 Site Constraints Map.

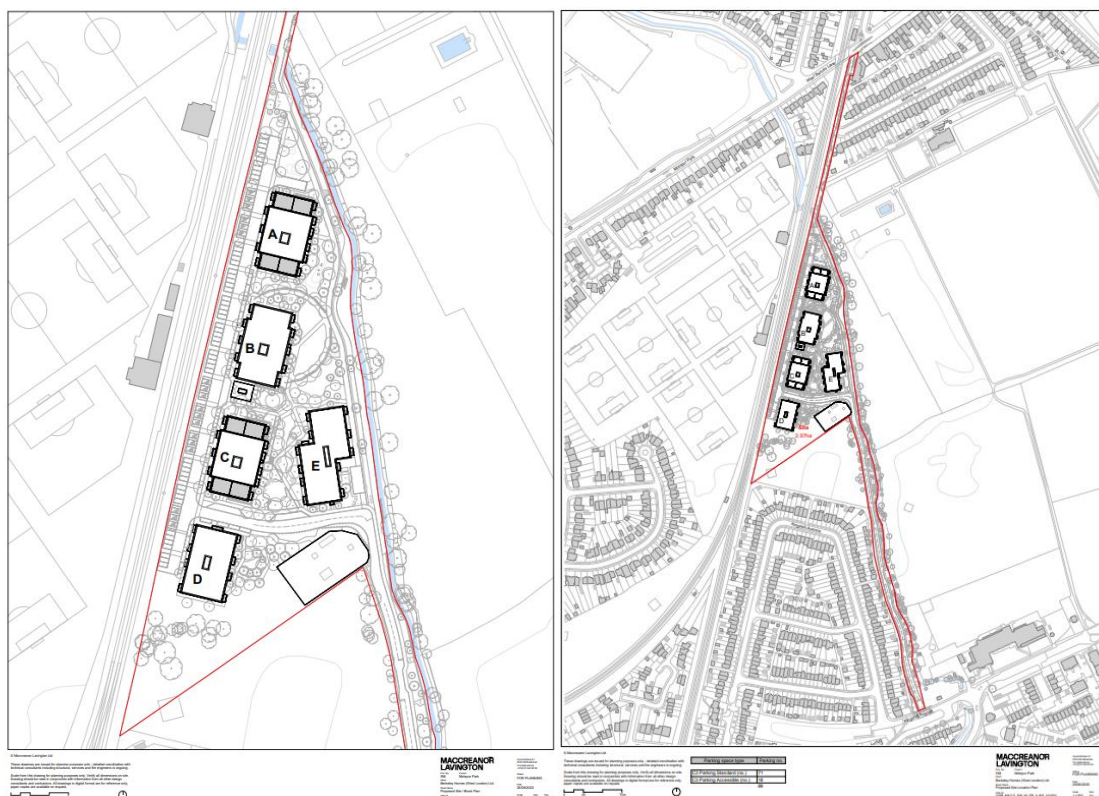


Source: Ramboll, as sourced from RBK, LBM and LBS policies maps.

Application Proposal

- 2.13 The Proposal comprises 586 new homes, within 5 buildings between 8-16 storeys in height, as identified on the Proposed Site Plans (drg. Nos: U096-MAC13-SW-XX-DR-A-005-101000 and U096-MAC13-SW-XX-DR-A-005-111000) (Figure 2.5).

Figure 2.5. Proposed Site Plans.



Source: Maccreanor Lavington

- 2.14 The 'cruciform' and 'L' building footprint typologies are predominantly proposed within the western area of the Site, with the tallest building (block A) positioned at the northern extent of the Site. The existing gasholders act as wayfinding from Motspur Park Station, which the proposed building to the north will maintain, albeit the proposed building heights (26.9m to 52.0m) are below the height of the tallest existing gasholder (at 59m). The buildings reduce in height to the south with setback roofs and gables to create a transition in scale. Breaks in the building massing also create visual and physical permeability.
- 2.15 The Proposal will exploit and enhance the Site's woodland context and connect the Site, via a new pedestrian access to the woodland and SJHMPF park to the east, create a riverside walk with associated improvements to the Beverley Brook, provide green infrastructure, landscaped open space and woodland planting.
- 2.16 The landscaped riverwalk will provide a north-south pedestrian and cycle link along the permeable edge of the brook to create a more direct route through the Site and connectivity to local facilities and services at both Motspur Park and Worcester Park (drg. Nos: U096-MAC13-SW-XX-DR-A-005-101000 and U096-MAC13-SW-XX-DR-A-005-111000) (Figure 2.5).

- 2.17 The majority of the play space (1,643 sq. m) will be provided on-site, with the remainder provided off-site in the adjacent SJHMPF park.
- 2.18 A residents' 'club house' (ancillary residential use) will act as a community focal point for residents, further enhancing the amenities within the Proposal.
- 2.19 Some 1,035 long-stay cycle parking spaces, 28 short-stay cycle spaces for visitors and 89 car parking spaces are provided, of which 18 will be 'blue badge' car parking spaces, to assist resident accessibility.
- 2.20 The proposed southern access road will serve as the sole vehicular access into and out of the Site, off Kingshill Avenue, once the development is operational. During the demolition and construction phases, vehicles will enter the Site from the north and exit from the south, providing a one-way system through the Site.

Pre-Application Engagement

- 2.21 The proposed development has been subject to pre-application engagement with the key stakeholders, most importantly the Greater London Authority ('GLA') as MOL is a strategic planning concept and policy designation. The GLA's written Pre-application advice in respect of the MOL (on 30 April and 18 September 2025) can be summarised as:
- 1 strong support for the principle of redeveloping this previously developed MOL (not publicly accessible) Site in a location relatively close to a station;
 - 2 agreement to the applicant pursuing an approach in accordance with NPPF paragraph 154(g), alongside a design-led optimisation of the Site for residential development combined with enhanced green infrastructure and publicly accessible open space;
 - 3 the existing gas holder frames on site, whilst offering a degree of visual permeability, do establish a certain baseline in terms of an impact on MOL openness; and
 - 4 the proposed scheme optimises the site capacity with a scale and form of development that responds well to the opportunities and constraints of this previously developed MOL site.

Summary

- 2.22 The Proposal seeks to transform the redundant former gasholders Site, comprising previously developed land within the MOL, into a new residential neighbourhood providing 586 high quality homes within an attractive riverside and woodland setting.

3.0 MOL Planning Policy

The Development Plan

3.1 The adopted Development Plan for the 2.83ha of the Site within MOL, in the RBK area comprises the:

- 1 London Plan (LonP, March 2021); and
- 2 Kingston Core Strategy (KCS, April 2012).

3.2 This provides the MOL and wider planning policy framework against which this application needs to be assessed, alongside the National Planning Policy Framework ('NPPF') (2024).

London Plan

3.3 Metropolitan Open Land Policy (G3, Part A) states that sites designated as MOL are afforded the same status and level of protection as Green Belt. The MOL should therefore be protected from inappropriate development in accordance with national planning policy tests that apply to Green Belt.

3.4 Policy G3 (Part B) promotes the extension of MOL designations, where appropriate, advising that Boroughs should designate MOL by establishing that the land meets at least one of the following criteria:

- 1) *"it contributes to the physical structure of London by being clearly distinguishable from the built-up area*
- 2) *it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London*
- 3) *it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value*
- 4) *it forms part of a strategic corridor, node, or a link in the network of green infrastructure and meets one of the above criteria."*

3.5 The supporting text to the policy (para 8.3.4) explains that *"Proposals to enhance access to MOL and to improve poorer quality areas such that they provide a wider range of benefits for Londoners that are appropriate within MOL will be encouraged. Examples include improved public access for all, inclusive design, recreation facilities, habitat creation, landscaping improvement and flood storage."* (our underlining for emphasis).

3.6 Policy G1 (Green Infrastructure) (Part A) also seeks to protect and enhance London's network of green and open spaces with green infrastructure that should be planned, designed and managed in an integrated way to achieve multiple benefits.

Kingston Core Strategy

3.7 There is no KCS policy dealing with development proposed *within* MOL.

- 3.8 Policy DM 5 (Green Belt, MOL and Open Space Needs) (Part A) only allows development on sites *adjacent* to the MOL that does not have a detrimental impact on its visual amenities and respects the size, form and use of that open space.
- 3.9 Policy DM 5 (Part B) states that the Council will ensure new developments contribute to the provision and improvement of the quality, quantity, variety and accessibility of public open space, play and sports facilities, to meet the needs it generates in accordance with the local provision and accessibility standards (set out in Annex 3 and the Planning Obligations SPD, or CIL charge).

National Policy and Guidance

National Planning Policy Framework

- 3.10 There is no express mention of Metropolitan Open Land in the NPPF, MOL being a strategic designation unique to London. The London Plan (Policy G3 (Part A and para. 8.3.2) states that land designated as MOL has the same status and level of protection as Green Belt and that national planning policy tests for Green Belt apply equally to MOL.
- 3.11 That is not to say that MOL and Green Belt are one and the same – the purposes of the two concepts are distinctly different. For these reasons, the NPPF provisions for ‘grey belt’ and the ‘Golden Rules’ do not apply to MOL (NPPF paras 155 and 156), as confirmed by the GLA.
- 3.12 The NPPF (para. 142) explains the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. The same therefore applies to MOL.
- 3.13 Once defined as Green Belt, the NPPF (para. 151) encourages local planning authorities to plan positively to enhance their beneficial use through, for example, opportunities to provide access, outdoor sport and recreation and to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. The same therefore applies to MOL.
- 3.14 The NPPF provides a general presumption against inappropriate development within the Green Belt which should not be approved except in very special circumstances (para. 153). Very special circumstances are not considered to exist “*unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.*” The same therefore applies to MOL.
- 3.15 The NPPF (para. 154) confirms that development in the Green Belt [read MOL] is inappropriate unless one of the following exceptions applies:
- “g) limited infilling or the partial or complete redevelopment of previously developed land (including material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary building), which would not cause substantial harm to the openness of the Green Belt.”* (Our underlining for emphasis)

- 3.16 This exception applies in this case, as the MPG Site amounts to PDL within the MOL promoted for residential redevelopment which – as assessed later in this MOLA - would not cause substantial harm to the openness of the MOL.

Planning Practice Guidance

- 3.17 The Government’s Planning Practice Guidance (‘PPG’) provides guidance on assessing the impact of a proposal on Green Belt [read MOL] openness. It states:

“Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgement based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

- *openness is capable of having both spatial and visual aspects - in other words, the visual impact of the proposal may be relevant, as could its volume;*
- *the duration of the development, and its remediability - taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness*
- *the degree of activity likely to be generated, such as traffic generations.”*

(Paragraph: 013 Reference ID: 64-013-20250225) (February 2025).

Emerging Plans

Towards a New London Plan

- 3.18 The Mayor of London published the ‘Towards a New London Plan’, which will set out a policy framework for how London will develop over the next 20-25 years, in May 2025.

- 3.19 On the future policy direction on MOL, the Mayor contemplates (in para 2.11) the contribution of some sites within the MOL being assessed and coming forward for development, as follows:

“The Mayor will continue to give protection to MOL given its vital role for Londoners and providing a liveable city as London grows. However, some areas of MOL, such as certain golf courses are not accessible to the public and have limited biodiversity value. This undermines the purpose of the designation. These areas could be assessed to understand whether they should be released from MOL.... They may be able to help meet London’ housing...provision. At the same time, they could improve biodiversity through landscape-led redevelopment.”

Draft Kingston Local Plan (Reg. 18)

- 3.20 RB Kingston has been preparing a new Local Plan for Kingston and, to date, have undertaken the following rounds of engagement to inform emerging policies in the local plan:

- Early Engagement (1 May - 31 July 2019);
- Further Engagement (1 July - 30 September 2021); and

- First Draft Local Plan (Reg. 18) (28 November 2022 - 28 February 2023).

- 3.21 As part of the Local Plan review, RBK prepared a ‘Green Belt and Metropolitan Open Land Assessment’ (2018) which found that the Site (MOL parcel 22) made a ‘*significant contribution*’ to the MOL against the designation criteria (see MOLA Section 4). Notwithstanding, the Site was identified for housing in the Local Plan Early Engagement (Regulation 18) May 2019 (**Appendix 1**) but was not taken forward on the basis that RBK decided to not remove any of the sites then identified for release from its Green Belt and MOL for development.
- 3.22 Draft Policy KN6 (Green Belt and Metropolitan Open Land) (Part B) sets out that inappropriate developments within MOL will not be permitted, unless very special circumstances can be clearly demonstrated and that any potential harm resulting from the proposal is clearly outweighed by other considerations. Additionally, Part C of this draft Policy states that proposals which improve public access to and involve recreation activities on MOL could be supported where there is no conflict with the intended purposes, openness or nature conservation value of such land.
- 3.23 Following the change in Government and publication of the revised NPPF in 2024, on 11 February 2025, the Council published an updated Local Development Scheme, to schedule for an additional Reg.18 consultation within a revised indicative timetable, commencing with preparation of the Local Plan (including consultation) (Reg. 18) in Q3 2025.

MOL Policy Considerations

- 3.24 London Plan Policy G3 affords MOL the same status and level of protection as Green Belt. Accordingly, the MOL policy considerations for this Proposal are established by the development plan (LonP G3), NPPF (para. 154(g)) and PPG (para. 13). The emerging new London and Kingston plans are at very early stages and so attract no weight at present.
- 3.25 As the MPG Site is PDL, the Proposal comprises a NPPF paragraph 154(g) exception: providing for the complete redevelopment of PDL to residential use, which - we find through this MOLA - would not cause substantial harm to the openness of the MOL. Openness for this purpose simply means the absence of development.
- 3.26 The MOL considerations for this NPPF para 154(g) exception site Proposal are:
- 1 The effect of the proposed development on the spatial openness of the MOL, having regard to the proposed change to the extent, footprint and volume of development on the Site;
 - 2 The effect of the proposed development on the visual openness of the MOL;
 - 3 The duration of the development proposed and its remediability;
 - 4 The degree of activity likely to be generated, such as traffic generation;
 - 5 Whether the overall effect of the Proposal would cause “*substantial harm*” (or not) to the openness of the MOL.
- 3.27 “*Substantial harm*” to the MOL is not defined in planning policy or guidance but is self-evidently a very high test.

- 3.28 In assessing the above effects, it is relevant to first appreciate the concept of the MOL and consider the extent to which the Site currently contributes to the MOL, assessing it against the criteria for MOL designation in LonP Policy G3, namely:
- 1 Does the Site contribute to the physical structure of London by being clearly distinguishable from the built-up area;
 - 2 Does the Site include open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London;
 - 3 Does the Site contain features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value; and
 - 4 Does the Site form part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the criteria in 1-3 above.
- 3.29 The policy framework also requires an assessment of the extent to which the Proposal will bring MOL benefits to the Site, alongside the wider social, economic and environmental planning benefits it will deliver, when undertaking the planning balance exercise.

4.0 The Site's Existing Contribution to MOL

MOL Concept

- 4.1 MOL is a strategic planning designation to protect such designated open spaces within the built environment. The concept and policy of MOL was established through preparation of the Greater London Development Plan (GLDP), adopted in 1976, and subsequent Local Plan designations. The GLDP (para. 9.8 states):

“Within Greater London open land can provide useful and attractive breaks in the built-up area, relieving the monotony of an otherwise continuous urban development. Open land which is of significance for Greater London as a whole is described in this Plan as Metropolitan Open Land, and it will be an objective of the planning authorities to conserve and protect it. Many of these areas are public and their future is safe; but others are at risk. They are not appropriately situated for incorporation in the Green Belt, often forming islands embedded in the urban fabric or penetrating deeply in the urban area as green wedges. They nevertheless need to be safeguarded just to match as the Green Belt.”
(Our underlining for emphasis).

- 4.2 The GLDP (paragraph 9.9) advises that appropriate uses of the MOL include public and private open space and playing fields; agriculture, woodland and orchards; golf course; allotments and nursery gardens; and cemeteries and crematoriums.
- 4.3 There has not though been a fundamental strategic review of the extent of the London MOL designation since 1976. It has been left to individual LPAs to initiate and determine whether there are exceptional circumstances to justify site boundary amendments.

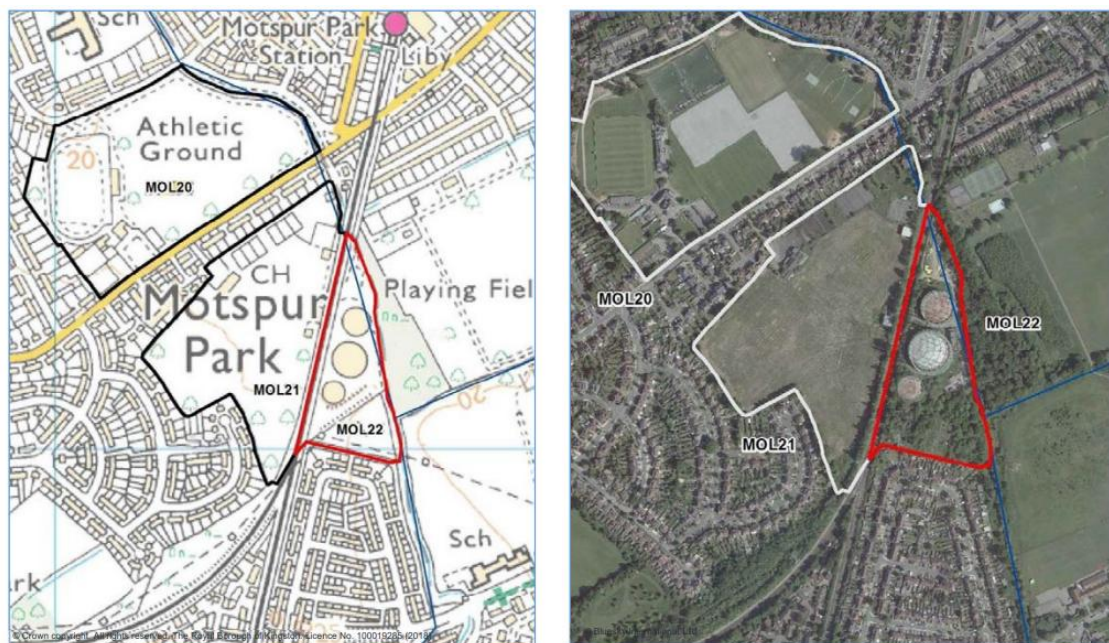
Site's Contribution to MOL

RBK Review

- 4.4 The RBK undertook a 'Green Belt and Metropolitan Open Land Assessment' ('GB & MOL Assessment') in 2018 against the MOL designation criteria of Policy 7.17 of the former London Plan (2016)¹ (**Appendix 2**). The majority of the Site is identified under 'Parcel MOL 22' (Figure 4.1), save for the Site's southern access route (albeit this is also designated as MOL), in addition to the SINC and allotment land outside the Site.

¹ Policy 7.17 of the LonP 2016 (Part d) sets out that “it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.”, whereas Policy G3 of the LonP 2021 (criteria 4) states: “it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria”.

Figure 4.1 Parcels MOL 20, 21 and 22 in RBK's Greenbelt and MOL Assessment (2018).



Source: RBK Greenbelt and MOL Assessment (2018) – Appendix A.

- 4.5 The Site is described within the Assessment (Figure 4.2 and Appendix 2) as a compact triangular parcel consisting of a gasometer site and allotments. Amenity grassland forms at the base of the gasholders, with scrub woodland to the south of the parcel surrounding the small allotment area and extending along the Beverley Brook.

Figure 4.2 Parcel 22 MOL Assessment.

| Topic | Criteria | MOL22 Assessment |
|--------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| MOL criteria (London Plan, Policy 7.17) | | |
| Contributes to the physical structure of London | Is the parcel clearly distinguishable from the adjacent built-up area and thereby making a clear contribution to the physical structure of London? | CONTRIBUTION Whilst of a small scale and high degree of enclosure, the parcel is related to extensive open space in Merton Borough to the east, and notwithstanding the developed character of the parcel, the contribution to wider structure of the locality is clear. |
| Includes recreation and other facilities serving either the whole or significant parts of London | Does the parcel include sport, recreation, leisure and cultural facilities which are of strategic importance? | LIMITED CONTRIBUTION No strategic facilities. Locally important allotments. |
| Contains features of national or metropolitan value | Does the parcel contain features or landscapes (historic, recreational, biodiversity) which are of national or metropolitan value? | SIGNIFICANT CONTRIBUTION Part SINC (covering the allotments) and forms the western boundary of Beverley Brook Strategic Corridor identified in the All London Green Grid. |
| Is part of Green Infrastructure | Is the parcel part of a Green Chain or acts as a link in the network of Green Infrastructure? | SIGNIFICANT CONTRIBUTION Designated as a Green Chain. Part of the Beverley Brook Strategic Corridor. Linked to extensive MOL to the east (Merton Borough). |
| Overall Contribution to MOL criteria | To what extent does the parcel contribute to MOL criteria? | SIGNIFICANT CONTRIBUTION Makes a Significant Contribution as part of the context for strategic asset (Beverley Brook Strategic Corridor) and wider Green Infrastructure. |

Source: RBK Greenbelt and Metropolitan Open Land Assessment (2018).

- 4.6 Assessed against the MOL criteria of then LonP Policy 7.17 the Assessment concludes that Parcel MOL 22 “*Makes a Significant Contribution as part of the context for the Beverley Brook Strategic Corridor and wider Green Infrastructure*”. The RBK assessment

comments against each of the four criteria indicate the positive contribution to the MOL is down to the river and the part SINC (covering the allotments) to the south, not the gasholders site itself.

- 4.7 Like RBK, in preparing new and reviewing policies within their local plans both LBM and LBS have undertaken respective reviews of their MOL designations, including assessment of MOL parcels adjacent the Site.

Our assessment

- 4.8 We assess the central portion of the Site, excluding the SINC, against the four MOL designation criteria in turn below.

“1) contribution to the physical structure of London by being clearly distinguishable from the built-up area?”

- 4.9 The proposal Site is a former utilities site and is occupied by three redundant gasholders being 59m, 49m and 26m high and includes associated gas infrastructure comprising existing buildings, structures and large areas of hardstanding. The gasholders are prominent structures in the skyline and visible from many public viewpoints. They form a key part of a former utilities site comprising PDL within a visually enclosed woodland context, one connected to the urban area via the north and south access routes. The Site therefore has a distinct *built* character, visually linked to the nearby suburban housing in Motspur Park and Worcester Park.
- 4.10 Land along the east-west axis from the Site contains sport and/or open-air facilities which are largely free of built development, save for small scale development associated with appropriate MOL uses (i.e. a sports clubhouse). The relationship of these MOL parcels to the east and west with the Site does not create a pattern of development that is clearly visually linked. This is further exacerbated by the railway line along the full extent of the Site’s western boundary which creates a definite and physical break between the Site and MOL parcel 21 (in RBK) to the west.
- 4.11 The Site is therefore classified as PDL within the MOL and is not physically distinguishable from the adjacent built-up area to the north and south, but is distinguishable from the swathe of MOL to the east and west which has a different townscape. We therefore disagree with the RBK GB and MOL Assessment that the larger Parcel 22 does make a “Contribution” to this MOL criterion.

“2) includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London?”

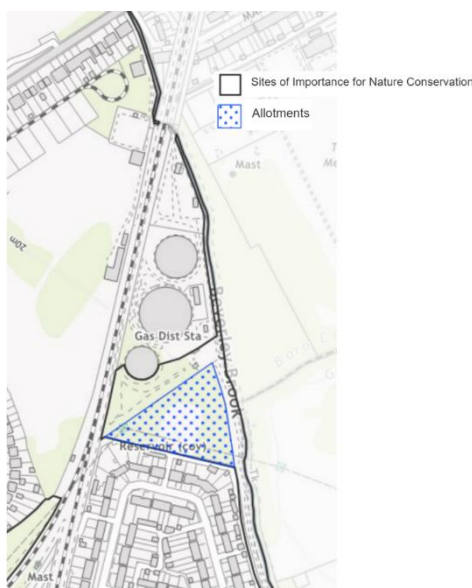
- 4.12 The central part of the Site has no active open-air facilities for leisure, recreation, sport, the arts and cultural activities, or any purpose other than gas infrastructure, and is publicly inaccessible. It does not serve the immediate locality, let alone the whole or significant parts of London and therefore does not meet criteria two. The allotments land, forming part of a SINC, lying outside the Site do provide an open-air recreational facility serving a local need, rather than significant parts of London.

- 4.13 The Site element of larger Parcel 22 does not, therefore, make a “*Limited Contribution*” to this MOL criterion.

“3) contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value?”

- 4.14 The gasholders are not statutory or locally listed and the Site does not contain other features of historic or recreational value which are of national or metropolitan value. The SINC within and adjoining the Site is of local value only, predominantly covering the allotments to the south (beyond the Site boundary), the Beverley Brook and a small area of woodland planting within the Site (Figure 4.3).

Figure 4.3. KCS Policies Map Extract.



Source: RBK (2018)

- 4.15 The RBK GB and MOL Assessment recognises that it is the SINC, covering the allotments, adjoining woodland and the ‘Beverley Brook Strategic Corridor’ (as identified in the All-London Green Grid) which lead them to conclude that Parcel 22 (which contains these areas) making a “*Significant Contribution*” to this MOL criteria; not the Site itself.
- 4.16 The RBK assessment did not identify any feature of national biodiversity interest. The Applicant’s ecology survey (ES Chapter 11: Ecology) has identified the presence of Jersey cudweed on the Site, this being listed under Schedule 8 of the Wildlife and Countryside Act as having a ‘nationally scarce’ status. The presence of a small population of a nationally scarce plant species (Jersey cudweed) means the Site does contribute to the biodiversity element of this criterion; however, the Jersey cudweed is proposed for translocation to the open mosaic habitat being created on the biodiverse roofs of the development.
- 4.17 The Site does not therefore contain historic, recreational or biodiverse features or landscapes of either national or metropolitan value, save for the limited extent of a nationally scarce plant which is proposed to translocate within the Site.

“4) forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria?”

- 4.18 The RBK GB and MOL assessment considers that the Site's Green Chain designation and forming part of the 'Beverley Brook Strategic Corridor' status means Parcel 22 makes a "Significant Contribution" to this criterion.
- 4.19 The KCS defines a Green Chain as "*a series of elongated open spaces surrounding the Borough's major watercourses, linking the Green Belt and broader areas of open land within the urban area.*" (KCS Annex 1, p.208). Additionally, the All London Green Grid SPG (2012) states: "*The Beverley Brook corridor connects the Thames Path National Trail through Barnes Common, Richmond Park, Wimbledon Common and a myriad of public open spaces to the south following the Beverley Brook itself.*" (para. 5.115)
- 4.20 The proposal Site is located adjacent the Beverley Brook; however, there is no open space or public access to this adjoining blue and green infrastructure adjacent. On the contrary, the Site contains three redundant gas holders with associated gas infrastructure and large areas of hardstanding. The Site is not 'open space' for public use; it is fenced off which limits its permeability and function to link with other open spaces along the Beverley Brook.
- 4.21 The Site itself does not therefore contribute to this criterion.

Summary

- 4.22 MOL is intended to provide useful and attractive breaks in the built-up area, relieving the monotony of an otherwise continuous urban development. We find that, having regard to the MOL designation criteria, the Site:
- 1 comprises previously developed land that is not clearly distinguishable from the built-up area;
 - 2 does not contain open air facilities or features or landscapes which are of national or metropolitan value - only part of a SINC which is of local value;
 - 3 does not contain features of historic or recreational value which are of national or metropolitan value, but does
 - 4 contains a biodiverse feature of national value (Jersey cudweed) on a small part of the Site which will be translocated to remain on Site: and
 - 5 is located within a defined Green Chain but primarily contains redundant gas holders, infrastructure and hardstanding at present - it does not provide open space next to Beverley Brook that can be used by the public.
- 4.23 We therefore conclude that the existing Site does not contribute to the MOL, save for the presence of a nationally scarce plant on a small part of the Site. This provides the context for our assessment of the effects of the Proposal on the openness of the MOL, in particular from the wider swathe of open MOL land from various public viewpoints around the Site to the east and west.

5.0 Impact on MOL

- 5.1 It is necessary, in assessing the harm to the MOL, to assess the effect arising from the effect of the proposed development would have on the openness of the MOL and its permanence.

Spatial Effect on Openness

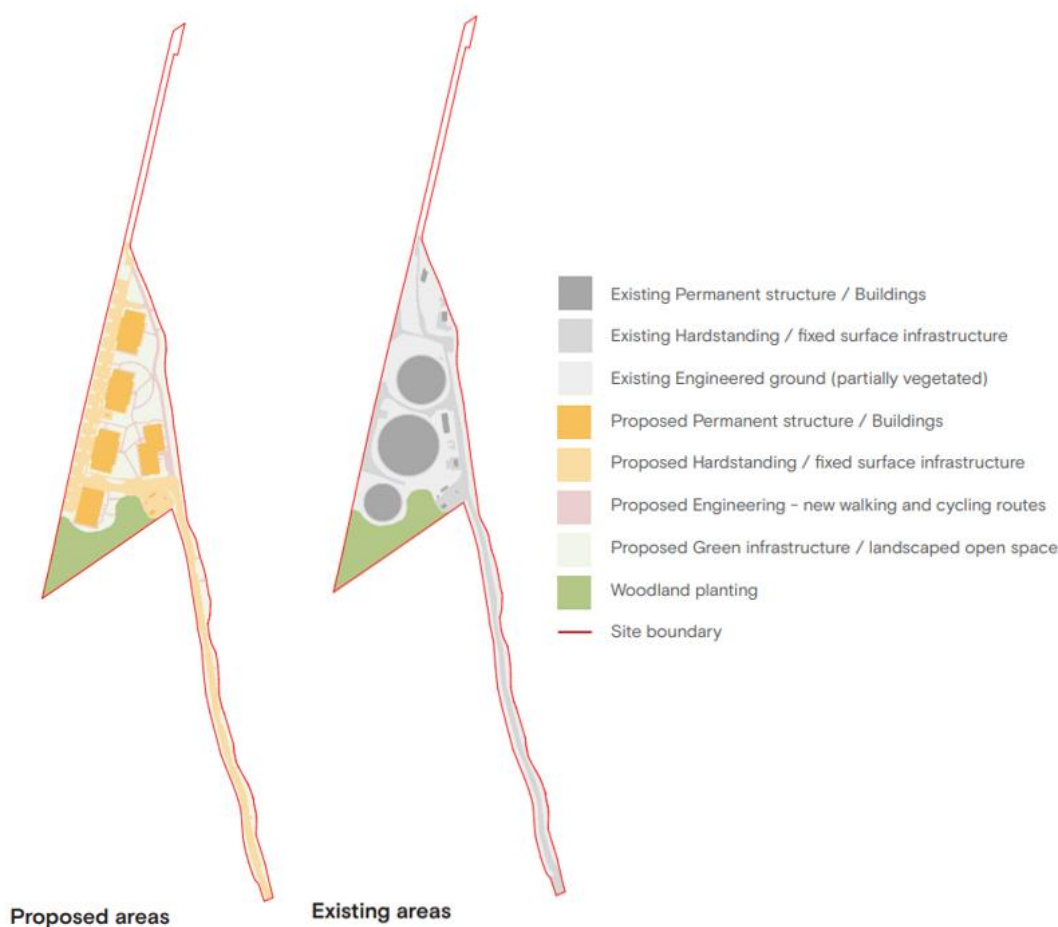
- 5.2 We have assessed the spatial change in the amount of development, in terms of its footprint, type and volume, in accordance with the PPG guidance, informed by a comparison of the spatial extent of the existing and proposed (building and engineering) development within outside the MOL (2.83 ha) by Maccreannor Lavington (in Table 5.1 and Figure 5.1 below).

Table 5.1. Comparison of extent of built development of the MPG Site within the MOL.

| Area | Existing | Proposed |
|-------------------------------------------------------|------------------------------------------------------------------|----------------------------------------------------------------------------|
| Permanent structure/buildings | 5,979 sq. m (21%) | 4,640 sq. m (16%) |
| Hardstanding/fixed surface infrastructure. | 6,984 sq. m (25%) | 8,3413 sq. m (30%) |
| Existing engineered ground (partially vegetated) | 11,341 sq. m (40%) | N/a |
| Proposed engineering - new walking and cycling routes | N/a | 2,021 sq. m (7%) |
| Proposed green infrastructure/landscaped open space | N/a | 9,302 sq. m (33%) |
| Total Developed Land | 24,303 sq. m (86%) | 24,303 (86%) |
| Woodland planting | 3,912 (14%) | 3,912 (14%) |
| Total Site Area in MOL | 28,215 (100%) | 28,215 (100%) |
| Maximum Height (m) | 76.63 AOD (Tallest gasholder) | 69.42 AOD (Block A) |
| Building Volume (m3) | 1,649 m3 (Gas infrastructure buildings - excludes gasholders) | 183,399 m3 (proposed residential buildings and retained pig trap sheds) |

Source: Maccreannor Lavington.

Figure 5.1. Surface Cover extent – Existing vs Proposed Site within MOL.



Source: Maccreanor Lavington.

Development Footprint

- 5.3 The three existing gas holders within the Site are significant industrial structures, surrounded by hardstanding and other gas infrastructure, arranged in a row to the east of the railway. They vary in size and scale; the largest (59m) is in the centre, is of equivalent scale to buildings of up to 16 storeys, with the smallest to the south. However, the physical extent of the gas holders is limited in the context of the wider large swathe of MOL in which they are located.
- 5.4 The openness of the existing Site itself is therefore presently very limited because it comprises building and engineering operations associated with the former gas holders, amounting to 86% site cover being development, the remaining 14% being the existing woodland at the southern end of the Site which is proposed to remain as existing. The proposed development site is therefore 100% PDL.
- 5.5 The effect of the proposed development footprint on the spatial openness is largely neutral given:

- the surface cover or development footprint of the proposed residential buildings is less than that of the existing permanent gasholder structures and buildings (16% vs 21% Site cover); whereas
- the areas of hardstanding associated with the proposed residential use slightly exceeds that of the existing Site (30% vs 25% Site cover).

- 5.6 However, the creation of engineered walking/cycling routes, green infrastructure and landscaped open space, abutting Beverley Brook, replacing the other existing engineered ground (40 % vs 40% Site cover), has a positive effect on the appreciation of the openness within the Site.
- 5.7 The proposed new residential blocks are sited towards the western boundary of the Site, an area of least sensitivity being parallel with the railway line and representing a coherent form of development (Figures 2.5 and 5.1). The Proposal will largely consolidate the prominent but visually permeable gasholders and the small existing infrastructure buildings and structures fragmented across the Site into five residential blocks with appropriate breaks between buildings to maintain visual permeability.
- 5.8 The overall effect of the proposed change to the footprint of development on the PDL within the Site is broadly similar, comprising less building/structures footprint offset by the more hardstanding with the notable positive change to MOL land being the creation of landscaped open space replacing ground engineered for infrastructure purposes.
- 5.9 Overall, the effect of these changes in surface cover is a neutral spatial effect on openness.

Volume

- 5.10 However, there will be a significant change in the volume of development on the Site, from 1,649 m³ to 183,399 m³, when comparing the change from what exists today with that proposed. The volume of the gasholders themselves has been discounted given they have been decommissioned and redundant since 2012, in favour of a subterranean gas pipe networks, so are not capable of being filled and the Ofgem requirement to dismantle the gasholder structures by 2029.
- 5.11 Historically, therefore, the gas holders would have had a solid form at certain times of the day, but this is no longer possible. The guide frames are lightweight structures which are visually permeable, so it is possible to see through them. This limits the extent to which the gas holders create a sense of enclosure to the MOL.
- 5.12 This results in a low existing baseline volume from which the proposed volume will amount to a significant change which have in increased spatial effect on openness.
- 5.13 The proposed heights of the residential blocks are:
- Block A - 16 storeys - 52.0m (at 69.42 AOD);
 - Block B - 13 storeys - 42.3m;
 - Block C - 15 storeys - 48.9m;
 - Block D - 12 storeys - 39.2m; and
 - Block E - 8 storeys - 26.9m.

- 5.14 In comparison, the heights of the three gasholder structures are:
- Central gasholder - 59m (at 76.63 AOD)
 - Northern gasholder - 49m
 - Southern gasholder - 26m
- 5.15 The tallest block (A) is positioned at the northern extent of the Site, with a varied height distribution to the shortest block (E) at the southern extent of the Site. The reduction in the heights between the 5 buildings and 3 gasholders is therefore a reduced spatial effect on openness, when height is considered in isolation from their contrasting permeability.
- 5.16 The significant volumetric change to development from the massing of the five residential blocks will be most evident within the Site itself, where the full height of the buildings are in view. It will also be impactful from the publicly accessible open MOL outside the Site, but less so due to the visually enclosed nature of the Site screening the lower floors of the new blocks. The visual effect of the significant volumetric change is assessed by Montagu Evans (below).

Overall Spatial Effect

- 5.17 We consider the collective effect of the reduction in the amount of development footprint but significant increase in development volume, across the same piece of PDL, will have a marked spatial harm to the openness of the MOL. The spatial effect on openness would be the same if the gasholders had been demolished.

Visual Effect on Openness

- 5.18 Montagu Evans have prepared a separate assessment of the effect of the proposed development on visual openness of the MOL (provided at **Appendix 3**), alongside the accompanying Motspur Park AVR1 and AVR 3 Images and Indicative Viewpoints Map appended to it. A summary of the conclusions of this assessment is provided here.
- 5.19 Given their scale and footprint, the existing gas holders have a noticeable effect on the openness of the MOL. However, the physical extent of the gas holders is limited in comparison with the large area of MOL in which they are located. The gas holders are also redundant so cannot be filled, and the guide frames are light weight and visually permeable. This limits the effect of the existing gas holders on the visual openness of the MOL.
- 5.20 The proposed development includes five new residential blocks ranging from 8 to 16 storeys. The proposed buildings are solid structures, some of which are located outside the footprint of the existing gas holders. The proposed building would introduce a very noticeable change to the skyline in views from the MOL directed towards the site. There would therefore be a marked level of harm to the visual openness of the MOL.
- 5.21 Given the expansiveness of the views across the land, the scheme would only screen a relatively small part of the horizon line in the context of the MOL as a whole. The area of woodland and the vegetation along the railway line would soften the scheme's impacts. The gaps between the proposed buildings allow visual connections through the MOL. The variation in the scale and set backs further soften the effect. For these reasons, the harm would not be substantial.

- 5.22 This conclusion would also apply to a cleared site, for the same reasons, and because the visual permeability of the existing gas holders limits the difference between the existing situation and cleared site.

Development Duration

- 5.23 The existing gas holders were established in 1924, 1932 and 1954 respectively, which long preceded the introduction of MOL policy. There has been associated gas infrastructure upgrading works over the years since.
- 5.24 The redevelopment proposed is 586 new homes being intended to provide dwellings for occupation in perpetuity.
- 5.25 The Proposal therefore amounts to one form of development with a long duration with another, the point being the Site has not been redeveloped for c.100 years and the intention is that remains developed permanently.
- 5.26 The continuation of the land as a developed Site has a **neutral effect** on MOL openness.

Remediability

- 5.27 The remediation of this utilities site necessitates viable redevelopment to pay for the site decontamination and removal of the gas infrastructure, to ensure the Site can safely revert to an alternative future use. That is what is proposed through this residential scheme.
- 5.28 The Site cannot realistically be remediated without such development – even if the gasholder structures were to be dismantled separately - and there is no requirement for the Site to return to be return to open land.
- 5.29 The remediation process to secure residential development affords the opportunity to create new landscaped open space to increase within the Site which will be ‘free from development’ (see Section 6 on MOL planning benefits).
- 5.30 On the above basis, the site remediation secured by the Proposal will have an improved and thus **positive effect** on MOL openness.

Activity

- 5.31 The human and vehicular activity associated with the gas infrastructure at the private and enclosed MPG Site, both before and after the decommissioning of the gasholders in 2012, was and remains minimal, limited to occasional management of the utility operation.
- 5.32 The Proposal deliberately intends to create very noticeable increase human activity associated with the enjoyment of a new residential neighboured, containing 586 homes within a well landscaped and visually enclosed wooded setting.
- 5.33 There will also be a very noticeable increase in travel. The Transport Assessment (Table 6.6) identifies the multi-modal trip generation anticipated from by the proposed 586 dwellings to comprise 302 movements in the 0800-0900 weekday peak hour, 57% being rail, 15% on foot, 15% car, taxi or motorbike, 12% bus and 105 other trips.

- 5.34 There will therefore be a very noticeable increase in the level of movement and activity through the Site's residential redevelopment, in particular walking, whether as a single commuter to the Motspur Park (c. 2-minutes walk) or Worcester Park rail stations and to local bus stops either side of the Site.
- 5.35 The opening up of the Site to become an attractive and publicly accessible pedestrian and cycle route through the Site, between Motspur park and Worcester Park, deliberately seeks to increase activity and integrate the development with its neighbours, these improvements to walking and cycling infrastructure encouraging outdoor activities are commensurate with the use of land within MOL designation.
- 5.36 There will be a significant increase in the human activity at the Site and movement to/from it, compared to the Site's former utility use. The residents and their transport movements will reflect the transformation of the character of the place to residential within a wooded MOL setting. That perception of the increased activity within and will be masked, to some extent, by the Site's visual enclosure, but will be clear from trips to/from the Site.
- 5.37 Overall, the change in the level of activity would be very noticeable and positive from the perspective of greater outdoor recreational use of the MOL and bringing vibrancy to the neighbourhood, but negative in providing some but limited harm to the perception of MOL openness, given the visually enclosed nature of the Site.

Conclusion

- 5.38 Overall, agglomerating these various effects on openness considerations together, we consider the development proposed would amount to a very noticeable change to the Site which would have a marked level harm to the openness of the Site from the MOL, from the spatial and visual effects arising from the significant increase in development volume and the increase in human activity and movement.
- 5.39 However, the harm to openness would not amount to "*substantial harm*" to MOL openness, for the following reasons:
- 1 the development footprint and heights of the residential buildings (compared to the gasholder structures) are reduced;
 - 2 the remediation proposed will improve openness within the Site;
 - 3 the adjacent MOL parcels are extensive, which limits the impact in views of the development from the MOL;
 - 4 there will expansive views across the land and the surrounding woodland and vegetation along the railway line (within the MOL); and
 - 5 the variation in the scale of the proposed buildings, the set backs in Blocks A and C and the gaps between the proposed buildings create sky gaps in many of the views from the MOL, which allow visual connections across the MOL between the buildings.
- 5.40 The permanence of the residential development on PDL would be neutral as the Site has been PDL containing infrastructure development for a century.

- 5.41 Accordingly, the Proposal satisfies the requirement of the NPPF 154(g) exception policy and, consequently, LonP G3 too.

6.0 Planning Benefits to MOL

- 6.1 The proposal will deliver many social, economic and environmental planning benefits, most importantly the delivery of 586 market and affordable homes in a borough with a huge housing need and dire housing delivery (see Planning Statement, Section 15). However, in the MOLA, we solely identify and address the benefits which the Proposal will bring to the use of land within the MOL.

Social Benefits

Outdoor Recreation

- 6.2 The Site is in private ownership, is not publicly accessible or used for any form of recreational purpose. The proposed publicly accessible open space, incorporating pedestrian and cycle routes along the Beverley Brook and children's play spaces, will provide outdoor recreational space for use by future residents and those in the wider area. It would thereby make a highly valuable community contribution to meeting the informal outdoor recreational needs of local residents, at no financial cost to the public purse.

Connectivity

- 6.3 The Site is secured and fenced off, being contained for safe operations associated with its former use for the storage and distribution of gas. In contrast, the proposed Site will be publicly accessible and facilitate connection via sustainable modes (walking and cycling), particularly to Motspur Park Station. Providing public access to and through the Site will enable the redevelopment to make a valuable contribution to the viability and quality of place and fulfil the Sites function as part of the Green Chain and the 'All Green Grid' SPG.

Environmental Benefits

Improving Damaged Land

- 6.4 The Site is presently degraded, contaminated and underutilised, containing three redundant gas holders and associated infrastructure. The proposed redevelopment will regenerate this degraded Site, making the best use of brownfield land through transforming the Site into beneficial and active (private and public) use, recycling urban land (including making it safe from contaminants) and significantly improving the built and landscape quality of the Site.

Beverley Brook

- 6.5 The Proposal will re-naturalise sections of the Beverley Brook, which is anticipated to benefit flood risk management by enhancing channel storage capacity during flood events. Improvement to the banks of the Beverley Brook will also include introduction of additional planting to enhance plant diversity along this length of the Brook.
- 6.6 The enhancements to the Beverley Brook, including facilitating public access via a riverwalk, and introduction of landscaped open space and outdoor children's play space is appropriate development in MOL policy terms.

Biodiversity Improvements

- 6.7 The Proposal has applied a nature-led approach to Site design, with the objective to re-wild and naturalise this brownfield industrial site, bringing woodland into the Site and creating connections to wider areas of green infrastructure.
- 6.8 The proposed development will result in a total biodiversity increase of 34%, in excess of the 10% mandatory requirement. The submitted Landscape Statement, prepared by Fabrik, sets out the ecological enhancement to be delivered by the Proposal.
- 6.9 Notably, biodiversity enhancements will include wildlife friendly tree, shrub and herbaceous planting including species known to provide fruit, berries and nectar resources to wildlife, provision of bee bricks, bird and bat boxes and night scented flowering plants, to encourage foraging bats to use the Site. Tree planting has also been identified as a key aspect of the landscape strategy, with a net uplift in 253 trees proposed on Site and an Urban Greening Factor Score of 0.533.

Summary

- 6.10 A nature-based approach to Site design will secure enhancements to the open environment and quality of life for both existing local residents and future residents through appropriate development in MOL policy terms, resulting in social and environmental benefits comprising:
- 1 Publicly accessible open space providing outdoor recreation opportunities;
 - 2 Improved connectivity through the Site via sustainable modes, with no financial cost to the public purse;
 - 3 Improving damaged land through decontamination of a derelict and redundant gas holders and hard standing Site into beneficial and active (private and public) use;
 - 4 Enhancements to the Beverley Brook including facilitating public access, additional planting and flood risk management; and
 - 5 Biodiversity improvements in excess of the 10% mandatory requirement;

We therefore conclude that the above social and environmental planning benefits will improve the contribution that the Site makes to the purposes of its MOL designation.

7.0 Conclusions

- 7.1 This Metropolitan Open Land ('MOL') Assessment accompanies a full planning application for the redevelopment of the **Motspur Park Gasholders Site**, comprising **previously developed land within the MOL**, into a new residential neighbourhood providing 586 homes, together with publicly accessible landscaped open space and a riverwalk, within an attractive riverside and woodland setting, near Motspur Park railway station.
- 7.2 In **policy** terms, the Proposal would amount to **an exception** to 'inappropriate development' in the MOL, so long as the Proposal would not cause substantial harm to the openness of MOL (NPPF, para. 154(g); LonP policy G3).
- 7.3 MOL is intended to provide useful and attractive breaks in the built-up area of London, relieving the monotony of an otherwise continuous urban development. Our assessment of the existing Site against the **MOL designation criteria** finds that the Site does not contribute to the MOL. The presence of a small population of a nationally scarce plant species (Jersey cudweed) on part of the Site is proposed for translocation into the open mosaic habitat on the roofs of the development, so the limited contribution of the Jersey Cudweed to national biodiversity is retained.
- 7.4 In assessing the Proposal against the effect on openness tests in the PPG, we find that the **spatial and visual effects** of the proposed change from the gasholder utility to residential development proposed, and the related increase in human **activity** and movement, will cause a marked level of harm to the openness of the MOL, notwithstanding the reduced development footprint and heights of the buildings (compared to the structures) on the Site. The **permanence** of the residential development on PDL, replacing utilities infrastructure, would be neutral and the **remediation** would create more openness within the Site and improve its quality.
- 7.5 **Overall**, the Proposal would cause a **marked** level of **harm to the openness** of the MOL but this would not be substantial, having regard to the Site's environmental context and the sensitive approach to design of the development.
- 7.6 Furthermore, the opening of the Site to public access, the provision of outdoor recreational space, new pedestrian and cycle routes along the river walk and biodiversity enhancements will improve the contribution that Site makes to MOL purposes, brings **MOL benefits**.
- 7.7 Accordingly, as the harm that has been identified to the MOL is not substantial, the **Proposal satisfies** the requirement of the NPPF §154(g) exception test and London Plan policy G3.

Appendix 1 RBK Local Plan Site Assessments Early Engagement (Regulation 18) May 2019



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LOCAL PLAN

Site Assessments

Early Engagement (Regulation 18) **May 2019**

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Contents

| | |
|---------------------------------------------|-----|
| 1. Introduction | 2 |
| 2. What you need to know | 3 |
| 3. Kingston Town Neighbourhood sites | 5 |
| 4. Maldens and Coombe Neighbourhood sites | 122 |
| 5. South of the Borough Neighbourhood sites | 186 |
| 6. Surbiton Neighbourhood sites | 239 |

1. Introduction

We have an opportunity to identify sites across the borough to help us meet our housing need, as part of the Local Plan Early Engagement consultation. Although we have housing targets, we must also identify potential locations for other uses, like shops, offices or community facilities. This document looks at a range of possible sites that may be needed for all types of development within the borough over the next 20+ years.

National policy states that we should allocate sites in our Local Plan to promote development and the flexible use of land. All sites allocated must be deliverable within the plan period (2019-2041).

We ran a Call for Sites consultation from September to December 2017, asking everyone to submit any sites to the council which they thought might be suitable for future development. A range of sites were submitted by developers, landowners and the local community with suggestions for their future potential uses. Now is your chance to share your thoughts on these sites.

On the following pages, we present all the sites that were submitted to the council through the Call for Sites process, together with sites that were submitted to the Mayor of London as part of the London-wide Strategic Housing Land Availability Assessment (SHLAA), which was published in 2017. By adding the SHLAA sites to ours, it gives us more site options to look at.

When the Local Plan is adopted any ‘Site Allocations’ will broadly identify the types of development that will be allowed on a specific site.

QSA1: Do you have any views on any of the sites in this document?

Please state which site(s) you are commenting on using the site reference

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2. What you need to know

Sites within this document have been submitted either through our ‘Call for Sites’ consultation or suggested as part of the 2017 London Strategic Housing Land Availability Study (SHLAA) to the Greater London Authority.

The council does not have a view on any of these sites and wants to hear your views.

Once the consultation has closed, the council will review the feedback and complete any other assessments or discussions needed. Where appropriate, sites will then be proposed in the draft new Local Plan for further consultation.

All suggested sites have been included so that you can have your say on them before any decisions are made. It may be that many of these proposals are not appropriate and are not taken forward through the Local Plan process.

The description of some sites within this document may not be correct - we have used the exact responses from the Call for Sites consultation. This means that some of the sites do not represent the statutory planning land use.

Some sites have more than one proposal. The number of homes described is the total number (gross, not net) - if there are already homes on the site, it is assumed these will be lost to build the new housing. These figures are just a suggestion for the public to comment on.

Other information provided by the council

We have added some information to the bottom of each suggested site

| | |
|-----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Housing calculation: | <p>This is based on the London Plan density matrix, which can be found in Table 3.2 of the current London Plan¹. The matrix calculates a housing estimate for the site based on character and Public Transport Accessibility Levels.</p> <p>Character</p> <p>The “Character” referred to is based on how close the site is to one of the four main town centres in the borough. This is based on the character settings used in the 2017 London SHLAA.</p> <ul style="list-style-type: none">• Sites within 1km of Kingston Metropolitan Town Centre are classified as ‘Central’;• Sites outside of this area, but within 1km of the borough’s three District Centres (New Malden, Tolworth and Surbiton) are classified as ‘Urban’;• All sites outside of these areas classified as ‘Suburban’. |
|-----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

¹See: <https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan>

| | |
|--------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <p>If you disagree with the character included in the assessment, please include this in your comments.</p> <p>Public Transport Accessibility Levels (PTAL) PTAL is a scale which ranges from 1 (poor public transport services) to 6 (excellent public transport connections and services). The figures included here are based on 2015 and don't include potential transport improvements in the future.</p> |
| Strategic constraints | <p>Some sites may not conform with existing planning policy constraints. In this section we set out whether the site is in:</p> <ul style="list-style-type: none"> • Green Belt • Metropolitan Open Land • A listed building, or • A Strategic Industrial Location. |
| Site area (in hectares) | <p>Site areas are shown in hectares, with 1 hectare being 10,000 square metres.</p> |
| Map | <p>The site boundary maps are not shown to scale.</p> <p>The site boundary is shown in red and the borough boundary is shown in blue.</p> |

Excluded sites

A small number of sites were excluded. The sites are described below together with the reason for exclusion, except where the site was excluded for confidentiality reasons. If you would like to comment on these sites, please do so, quoting the address.

- Malden Road, KT4 Disused public toilets adjoining Harvester car park - No site plan submitted.
- Cap in Hand, Ace Roundabout, Hook - No site plan submitted.
- Surbiton Hill Garage, The Avenue, Surbiton KT5 8JW - Site under construction.
- The Fountain Public House, 120 Malden Road, New Malden, KT3 6DD - Planning permission granted for 45 homes (Planning reference: 17/15272/FUL).
- 14A Park Road, Kingston, KT2 6BG - Planning permission granted for 9 homes (Planning reference: 17/12997/FUL).
- The Barge Dock, Down Hall Road, Kingston, KT1 1PS - Planning permission granted for 9 homes (Planning reference: 18/12421/FUL).
- 29 Lovelace Road - Planning application currently under consideration. (Planning reference: 18/16554/FUL)
- Land to the rear of Riverdene Court, Grove Road KT6 4BX - Adjacent site sold for development and planning permission obtained for a bungalow.

Gasholders, West Barnes Lane

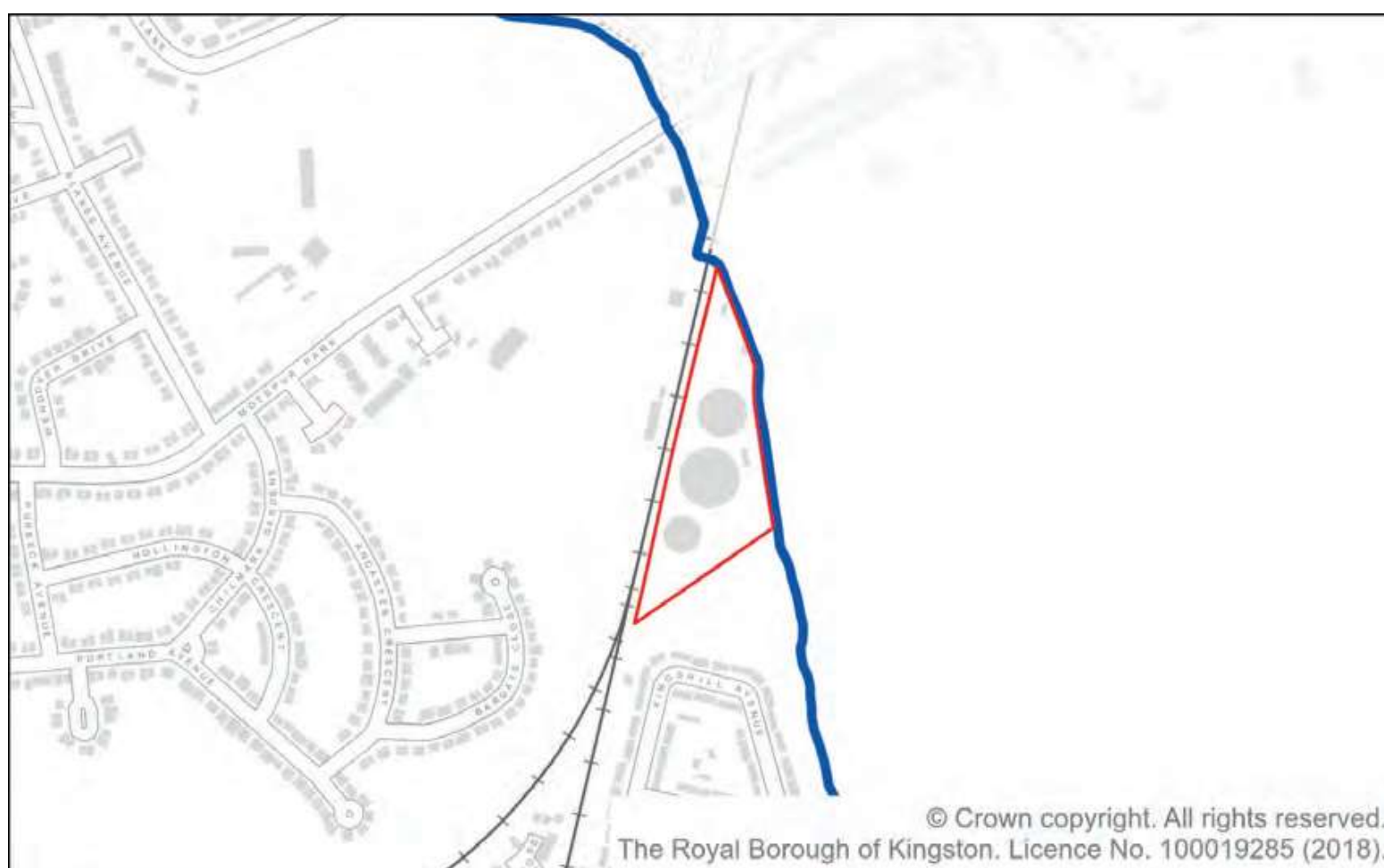
IMPORTANT NOTE: The council does not have a view on any specific proposal at this time and wants to hear your thoughts.

Proposal submitted

| | |
|----------------------------|---------------------------------------------------------|
| Site Assessments reference | SA082 |
| Address | Gasholder, West Barnes Lane, Motspur Park, KT3 6NQ |
| Type of site | Brownfield (previously developed land) |
| Existing land use | Non-residential only Non-Residential Use? Gasholders |
| Proposal | Residential Timescale: Up to 5 years (by 2023) |

Other information provided by the council to help consultation responses

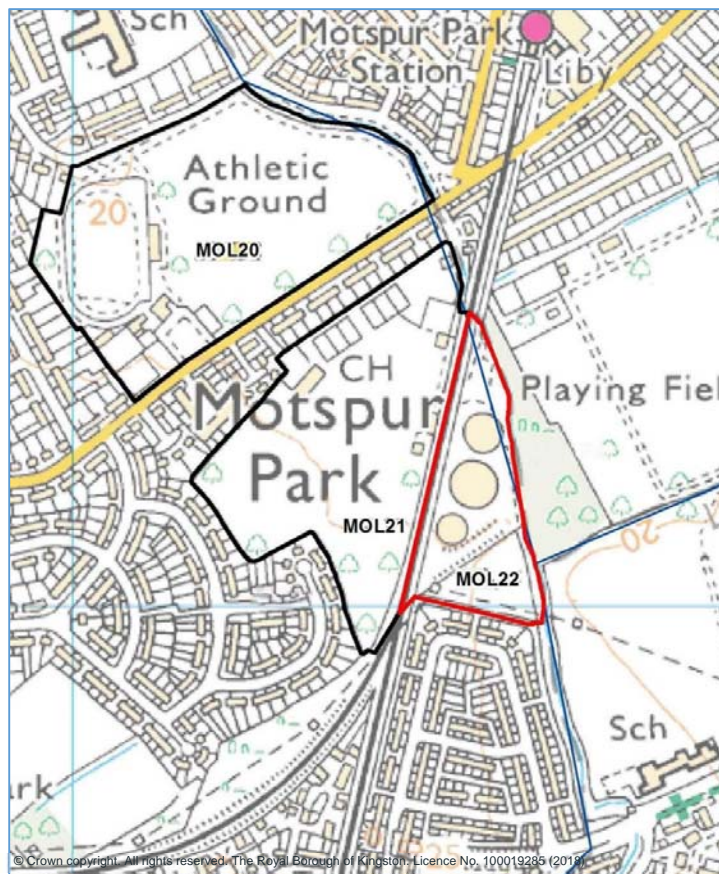
| | |
|-------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Housing calculation: | Based on the London Plan density matrix, assuming a Suburban character and Public Transport Accessibility Level of 0 Calculation of between 78 and 166 homes (if the whole site is residential only) |
| Strategic constraints | Metropolitan Open Land |
| Ward | Old Malden |
| Site area (in hectares) | 2.22 |



Appendix 2 RBK Green Belt and Metropolitan Open Land Assessment (2018) - Parcel 22

Parcel MOL22 – land between Beverley Brook and the Motspur Park rail line, bounded to the south by built development along Kingshill Avenue and extending along Beverley Brook adjacent to Kingshill Avenue.

A compact triangular parcel consisting of a gasometer site and allotments. Vegetation includes amenity grassland at the base of gasometers and scrub woodland to the south of the parcel surrounding the small allotment area and extending along the Beverley Brook to the rear of gardens and dwellings at Kingshill Avenue. An electricity pylon is located to the west of the allotments. Flat topography.



Appendix A: Parcel Assessments – MOL22

| Topic | Criteria | MOL22 Assessment |
|--------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| MOL criteria (London Plan, Policy 7.17) | | |
| Contributes to the physical structure of London | Is the parcel clearly distinguishable from the adjacent built-up area and thereby making a clear contribution to the physical structure of London? | CONTRIBUTION Whilst of a small scale and high degree of enclosure, the parcel is related to extensive open space in Merton Borough to the east, and notwithstanding the developed character of the parcel, the contribution to wider structure of the locality is clear. |
| Includes recreation and other facilities serving either the whole or significant parts of London | Does the parcel include sport, recreation, leisure and cultural facilities which are of strategic importance? | LIMITED CONTRIBUTION No strategic facilities. Locally important allotments. |
| Contains features of national or metropolitan value | Does the parcel contain features or landscapes (historic, recreational, biodiversity) which are of national or metropolitan value? | SIGNIFICANT CONTRIBUTION Part SINC (covering the allotments) and forms the western boundary of Beverley Brook Strategic Corridor identified in the All London Green Grid. |
| Is part of Green Infrastructure | Is the parcel part of a Green Chain or acts as a link in the network of Green Infrastructure? | SIGNIFICANT CONTRIBUTION Designated as a Green Chain. Part of the Beverley Brook Strategic Corridor. Linked to extensive MOL to the east (Merton Borough). |
| Overall Contribution to MOL criteria | To what extent does the parcel contribute to MOL criteria? | SIGNIFICANT CONTRIBUTION Makes a Significant Contribution as part of the context for strategic asset (Beverley Brook Strategic Corridor) and wider Green Infrastructure. |
| NPPF Purposes of the Green Belt | | |
| To check the unrestricted sprawl of large built up areas | Prevent the sprawl of a built-up area into open land where development would not otherwise be restricted by a permanent boundary. What is the role of the parcel in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries? | LIMITED CONTRIBUTION No role in this location given the enclosed character of the parcel and clear boundaries to surrounding development. |

Appendix A: Parcel Assessments – MOL22

| Topic | Criteria | MOL22 Assessment |
|-----------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To prevent neighbouring towns from merging into one another | <p>Prevent development which would result in the merger or erosion of a gap (physically or visually) between settlements.</p> <p>What is the role of the parcel in preventing the merger of settlements which might occur through a reduction in the distance between them?</p> | <p>CONTRIBUTION</p> <p>Forms part of a wider, locally significant, green wedge which is largely to the east in Merton Borough between the suburbs of West Barnes and Morden Park/Worcester Park.</p> |
| To assist in safeguarding the countryside from encroachment | <p>Protect the openness of the countryside and its perceived rurality.</p> <p>What is the role of the parcel in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</p> | <p>LIMITED CONTRIBUTION</p> <p>No role in this location given the enclosed character of the parcel and separation from open countryside.</p> |
| To preserve the setting and special character of historic towns | <p>Preserves the setting and character of an historic town.</p> <p>What is the role of the parcel in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</p> | <p>LIMITED CONTRIBUTION</p> <p>No connection with a Conservation Area.</p> |
| To assist in urban regeneration by encouraging the recycling of derelict and other urban land | <p>Does the parcel act in concert with adjacent parcels to encourage urban regeneration, either generally or more specifically?</p> | <p>LIMITED CONTRIBUTION</p> <p>Notwithstanding the presence of disused structures on the site the parcel is too small to encourage wider regeneration.</p> |
| Overall Assessment of Contribution to Green Belt Purposes | <p>In light of the assessment of individual purposes, what is the overall contribution of the parcel to the Green Belt, both individually and in a wider context?</p> | <p>CONTRIBUTION</p> <p>The parcel forms part of wider green wedge between the suburbs of West Barnes and Morden Park/Worcester Park.</p> |
| Local Role of the Green Belt | | |
| Preserving the setting and character of villages and other settlements | <p>What is the relationship between a village or hamlet and the surrounding Green Belt?</p> | <p>The parcel forms an isolated industrial 'island' amongst surrounding parcels of MOL but prevents coalition between West Barnes and Worcester Park.</p> |

Appendix A: Parcel Assessments – MOL22

| Topic | Criteria | MOL22 Assessment |
|-----------------------------------------------------------------------|--------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|
| Opportunities to Promote Positive Use of the Green Belt | | |
| Current public access and opportunities to provide access/ recreation | What is the degree of existing public access and/or provision of recreational facilities? | No public access to gasometers. Community access to allotments. |
| Enhancing landscapes and visual amenity | Does the parcel form part of the setting of a sensitive landscape (historic or otherwise)? | Does not form part of the setting of a sensitive landscape. |
| Enhancing biodiversity | Are there any national or local biodiversity designations within the parcel? | Site of Importance for Nature Conservation along the Beverley Brook and at the allotments and surrounding scrub woodland. |
| Improving derelict and damaged land | Is there any derelict land in the parcel? | Gasometers are now disused and are semi-derelict. |

Appendix 3 Metropolitan Open Land: Impact on Visual Openness Assessment (by Montagu Evans) and accompanying Motspur Park AVR1 and AVR 3 Images and Indicative Viewpoints Map

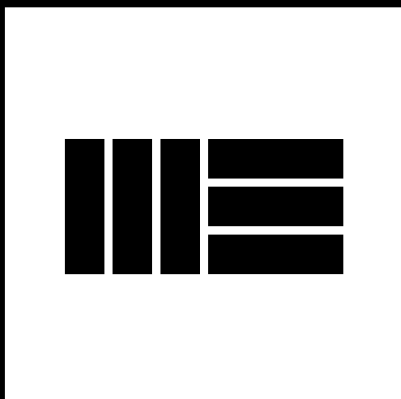
LAND IN MOTSPUR PARK

**SOUTH OF WEST BARNES LANE AND EAST OF THE
SOUTHERN RAILWAY, LONDON, KT3 6NQ**

METROPOLITAN OPEN LAND ASSESSMENT: IMPACT ON VISUAL OPENNESS

ON BEHALF OF BERKELEY HOMES

SEPTEMBER 2025



CONTENTS

| | |
|-------------------------------------------------------------------------------------------------------------------------------|---|
| 1.0 INTRODUCTION | 3 |
| 2.0 PLANNING POLICY FRAMEWORK | 5 |
| 3.0 ASSESSMENT OF IMPACT ON VISUAL OPENNESS | 8 |
| | |
| APPENDIX 1.0: METROPOLITAN OPEN LAND AND VIEWPOINT LOCATION PLAN | |
| APPENDIX 2.0: EXISTING AND PROPOSED AVR VIEWS FROM MOL | |
| APPENDIX 3.0: EXISTING AND PROPOSED NON-VERIFIED VIEWS FROM MOL (VIEWS 6 AND 17 AND TO THE WEST OF THE RAILWAY (PRIVATE LAND) | |

1.0 INTRODUCTION

- 1.1 This report has been prepared by Montagu Evans on behalf of Berkeley Homes ('the Applicant') to provide an assessment of the effect of the proposed redevelopment of the land in Motspur Park, situated south of West Barnes Lane and east of the southern railway ("the site") on the visual openness of the Metropolitan Open Land (MOL).
- 1.2 The description of development (the 'proposed development') is as follows:
- "Demolition of existing gasholders and associated above ground structures / buildings and redevelopment to provide a residential development and ancillary residential facilities (C3 Use Class), together with associated works to the existing accesses and internal vehicular routes, new pedestrian and cycle routes, the provision of new publicly accessible open space, amenity space, hard and soft landscaping, cycle and car parking, works to the brook embankment, [re-siting of some gas infrastructure], ground works and plant."*
- 1.3 The proposed development includes five buildings of the following scale:
- Block A: 16 storeys – 52.0 m in height
 - Block B: 13 Storeys – 42.3m in height
 - Block C: 15 storeys – 48.9m in height
 - Block D: 12 storeys – 39.2m in height
 - Block E: 8 storeys – 26.9m in height
- 1.4 The site lies predominantly within the Royal Borough of Kingston upon Thames ('RBKuT'). The access road to the north of Beverley Brooks falls within the London Borough of Merton ('MC').
- 1.5 The land of the Motspur Park Gas Holders, identified as MOL22, is part of a mosaic of open spaces which are designated MOL. A plan showing the wider extent of the MOL is reproduced at **Appendix 1.0**.
- 1.6 The site comprises 2.98 hectares of previously developed land, which had been occupied by gasholders since the 1920s.



Figure 1. Site Location on aerial photo (Source: Googlemaps)

- 1.7 Lichfields have prepared a Metropolitan Open Land Assessment (MOLA), which covers the majority of the assessment of the effect on the MOL, so this is not duplicated here, although some of the relevant information is repeated. The assessment contained in this report focuses solely on the effect of the proposed development on the visual openness of the MOL. It is informed by Accurate Visual Representations from the MOL which are reproduced in Appendix 2. A summary of the assessment of the effect on visual openness is provided in Lichfields' report.
- 1.8 For completeness this report summarises all the planning policy in relation to development within Metropolitan Open Land, rather than focusing solely on the policy relevant to visual openness.
- 1.9 The assessment considers the effect of the proposed development on the visual openness of the MOL in two scenarios:
- In comparison with the existing situation, with the gasholders in situ.
 - In comparison with a theoretical future scenario, with the gas holders demolished, given there is an Ofgem requirement to dismantle the gas holder structures across the country by 2029.
- 1.10 Montagu Evans has also prepared a Townscape Visual Impact Assessment (TVA) volume of the Environmental Statement, and an accompanying Heritage Statement which forms a technical appendix of the ES. Although related, the assessment of the effect on townscape character and visual amenity, is a different discipline to the effect on visual openness.

2.0 PLANNING POLICY FRAMEWORK

- 2.1 This section sets out the relevant planning policy on MOL and Green Belt. It begins by briefly explaining the history of the designation.

HISTORY OF METROPOLITAN OPEN LAND

- 2.2 The study area is characterised by two storey houses built on former agricultural land. The opening of Motspur Park station on the railway line between Waterloo and Guildford in 1925 accelerated the development of the wider area. Parcels of open land remained between the emerging neighbourhoods.
- 2.3 These areas of open space, squares and parkland contribute to London's character. First the Metropolitan Board of Works, then the London County Council (LCC) aimed at protecting the remaining open space from development pressure. In 1931, the Green Belt ring of open spaces was introduced, initiating local authorities to purchase land. The Green Belt (London and Home Counties) Act 1938 followed.
- 2.4 MOL was introduced in 1969 in the draft Greater London Development Plan (GDLP) published by the Greater London Council (GLC), the successor of the LCC. The GDLP was finally approved in 1976 as a protective designation for strategically important open land within the urban area. MOL area comprised parks, woodlands, golf courses, nursery gardens, cemeteries and other open land

THE LONDON PLAN AND MOL

- 2.5 The Metropolitan Open Land is a policy designation that is reflected in the London Plan and afforded a similar status and level of protection as Green Belt. The London Plan Policy G3, Part A sets out that:

- "1. MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt;*
- 2. boroughs should work with partners to enhance the quality and range of uses of MOL."*

- 2.6 Parts B and C of Policy G3 relate to extensions of MOL designations and alterations to boundaries and not directly relevant in this case. However, it is useful to note that the criteria for designating MOL land is that it should meet one of the following criteria:

- a. "it contributes to the physical structure of London by being clearly distinguishable from the built-up area*
- b. it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London*
- c. it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value*
- d. it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria"*

- 2.7 The MOLA prepared by Lichfields assesses the site against these criteria.

NATIONAL POLICY AND GUIDANCE

- 2.8 As London Plan Policy G3 is a designation unique to the capital, there is no reference to MOL in the NPPF. Policy G3 states that MOL is afforded the same status and level of protection as Green Belt.
- 2.9 Consequently, the NPPF's approach to Green Belt land should be applied to MOL.
- 2.10 Section 13 of the NPPF deals with the policy protection of the Green Belt. Paragraph 142 notes that the Government attaches great importance to the preservation of the open quality of Green Belt land, and its purpose of preventing urban sprawl by keeping land permanently open with the essential characteristics being openness and permanence.

- 2.11 Paragraph 150 requires local authorities to **plan positively** to enhance their beneficial use, such as looking for opportunities to provide access, opportunities for outdoor sport and recreation, retain and enhance landscapes, visual amenity and biodiversity, as well as improved damaged/derelict land.
- 2.12 Paragraphs 152 to 156 set the process for considering proposals affecting Green Belt. Paragraph 152 identifies that
“inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.”
- 2.13 Paragraph 153 highlights that:
“...local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.”
- 2.14 The construction of new buildings should be regarded by Paragraph 154 as inappropriate. However, relevant exceptions to this include (emphasis added):
“a) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
g) limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt”
- 2.15 Paragraph 155(h) identifies certain other forms of development that are also not inappropriate, provided they preserve openness and do not conflict with the purposes of including land within it. These include (but are not limited to):
b) engineering operations,
d) the re-use of buildings provided that the buildings are of permanent and substantial construction; and
e) material changes of use of land.
- 2.16 The NPPF is supported by the Planning Practice Guidance (PPG) which provides further guidance on Green Belt matters, including drawing upon recent case law that has affected decision making in development proposals. It sets out that in relevant cases where impact on openness is assessed, it should take into account a number of factors, including but not limited to:
 - *openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
 - *the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
 - *the degree of activity likely to be generated, such as traffic generation.*
- 2.17 The PPG does not provide a definition of “substantial harm” to the Green Belt/ MOL, nor is there any relevant case law to date.

KINGSTON LOCAL PLAN AND MOL

- 2.18 The strategic objectives of protecting MOL are also reflected in KC's Policy DM 5 Green Belt, Metropolitan Open Land (MOL) and Open Space Needs, which contemplates development on MOL and provides criteria for permitting proposals:

The Council will:

- a. only allow development on sites adjacent to the Green Belt, MOL or other open space designation that does not have a detrimental impact on its visual amenities and respects the size, form and use of that open space, in accordance with national guidance (currently PPG2)*
- b. ensure new development contributes to the provision and improvement of the quality, quantity, variety and accessibility of public open space, play and sports facilities, to meet the needs it generates in accordance with the local provision and accessibility standards set out in Annex 3 and the Planning Obligations SPD, or Community Infrastructure Levy charge*
- c. ensure that development proposals do not result in the whole or partial loss of public open space, outdoor recreation facilities or allotments unless a replacement site or facility provides a net benefit to the local community and visitors in terms of the quality, availability and accessibility of open space or recreational opportunities*
- d. ensure that development proposals do not harm open spaces which:*
 - i. contribute to the character, appearance and heritage value of the Borough's open space network*
 - ii. create focal points and valuable amenity space within the built up area*
 - iii. form part of an area of value for wildlife, sport or recreation*
- e. ensure all new provision of sports and play meet qualitative standards and optimise accessibility to all users, including the local community and visitors*

3.0 ASSESSMENT OF IMPACT ON VISUAL OPENNESS

- 3.1 NPPF Policy 154g identifies that the redevelopment of previously developed land would not be inappropriate where it would not cause substantial harm to the openness of the Green Belt, where the development would contribute to meeting an identified affordable housing need within the area of the local planning authority.
- 3.2 During pre-application discussions with the GLA and RBK, officers agreed that the proposed development would not be inappropriate development in the MOL under this policy exception.
- 3.3 Openness for these purposes simply means the absence of development. It has a spatial dimension (extent of building in footprint terms, as an absolute measure) and a visual dimension (scale of development which affects the perception of openness). In assessing impact on openness, one has to take into account the spatial dimension and the visual one, and even in cases where there is no or limited visual impact, it is important for the assessment to consider that potential for visual impact. It is not necessarily a statement about the visual qualities, although in some cases, this may be an aspect of the planning judgement.
- 3.4 The volumetric assessment is provided in the MOLA prepared by Lichfields, whereas this report focuses on the visual impact on openness.
- 3.5 As to the distinction between openness and visual impact, it is incorrect to suggest that it is wrong in principle to arrive at a specific conclusion as to openness by reference to visual impact. The concept of openness is not narrowly limited to a volumetric approach to development. It is open-textured and a number of factors can be relevant, including how built up the MOL is now, how built up it would be if development occurs and factors relevant to visual impact. This is a matter of planning judgement for the LPA.
- 3.6 There is also a distinction between the assessment of visual impact, as set out in the Landscape Institute GLVIA 3 guidance, which relates to the effect on visual amenity, and the effect on visual openness. The former considers the aesthetic merits and attractiveness of a proposal, whereas this is not relevant to the assessment of the impact on openness. Considerations such as scale, massing and the effect on skyline would be relevant to both assessments.
- 3.7 The assessment has considered a number of factors, including, but not limited to:
- The effect on the MOL as a whole, including adjacent land and MOL in the wider areas.
 - The effect on visual connections across the MOL.
 - Private as well as public views, although noting that public views have greater weight.
 - The extent and height of the built form and whether it overbears on and encloses the open land.
 - To what extent the horizon is affected when looking in different directions on the MOL.
 - The influence of the proposed design on these effects.
- 3.8 The assessment of the effect of the proposed development on the openness of the MOL has also been informed by Accurate Visual Representation ("AVR") or 'verified view' (produced by Cityscape Digital) reproduced in **Appendix 2**. This is a selection of the AVRs produced for the TVA, solely from the MOL. A plan indicating the location of these viewpoints in the MOL is reproduced in **Appendix 1**.

THE EFFECT OF THE EXISTING GAS HOLDERS ON VISUAL OPENNESS

- 3.9 The three existing gas holders are significant industrial structures. The gas holders are arranged in a row to the east of the railway. They vary in size and scale; the largest in the centre, is of equivalent scale to buildings of up to 16 storeys, with the smallest to the south. The scale of the existing gas holders is as follows:

- Northern: 49m
- Central: 59m (76.63 AOD)
- Southern: 26m

3.10 The railway is lined with a band of mature trees on both sides. There is extensive woodland surrounding the gasholders to north, east and south. The gas holders are located in MOL. There are other MOL parcels adjacent to the east and west, and forming a mosaic separated by low scale housing across a wider area, including:

- Joseph Hood Memorial Playing Fields
- Kingshill Avenue Allotments
- Motspur Park
- Fulham FC training grounds
- Morden Cemetery
- Merton and Sutton Joint Cemetery
- Kings College School Kingsway Sports Ground
- Green Lane Primary School and Playing Fields
- Mayflower Park Wetlands
- Manor Park

3.11 The two larger gas holders are very noticeable in public views from the MOL, including from Joseph Hood Memorial Playing Field (views 1, 11, 21 and 22) and the paddocks and equestrian centre to the south (views 1, 12 and 14). The guide frames are visible silhouetted against the skyline, while the lower part of the gas holders is screened by woodland in views from the east and south. One is aware that there is associated infrastructure at ground level, albeit this is screened by woodland. There are clearer views of the third, smaller gas holder in some views from the paddocks to the south (view 12), although elsewhere there are only glimpses because of the woodland screening. Given their scale and footprint, the existing gas holders have an effect on the openness of the MOL. However, given they have been redundant since 2012 and achieving their inflated volumes is no longer possible, this results in a low existing baseline volume.

3.12 The MOL parcel immediately west of the railway is private land, so there are no AVRs from this location. Instead VUCity model shots are reproduced in **Appendix 3**. These illustrate that while there are mature trees along the railway, the tree cover is not as dense and deep as the woodland to the east. All three gas holders are prominent, and have a noticeable effect on the openness of the MOL, in the same way as in views from the MOL to the east.

3.13 The effect of the existing gas holders on the openness of the MOL is limited by the following factors:

- a. The gas holders are surrounded by large swathes of MOL, as illustrated in the plan at **Appendix 1** and the aerial photo at **Figure 1**. The physical extent of the gas holders is limited in comparison. The gas holders there have a limited effect on the horizon when looking towards them i.e. there is MOL either side, and no effect when looking in different directions across the MOL.
- b. The gas holders are redundant, so are not capable of being filled. Historically the gas holders would have had a solid form at certain times of the day, but this is no longer possible. The guide frames are lightweight structures which are visually permeable, so it is possible to see through them. This limits the extent to which the gas holders create a sense of enclosure to the MOL.

SUMMARY OF THE PROPOSED DEVELOPMENT

3.14 The proposed development comprises five buildings, four of which are arranged parallel to the railway (Blocks A to D), with a fifth to the east, parallel with Beverley Brook. Blocks B, C, D and E are in broadly the same location as the existing gas holders, whereas Block A is outside the footprint of the existing gas holders.

3.15 The proposed scale of the buildings is as follows:

- Block A: 16 storeys – 52.0 m in height, 69.42m AOD
- Block B: 13 Storeys – 42.3m in height
- Block C: 15 storeys – 48.9m in height
- Block D: 12 storeys – 39.2m in height
- Block E: 8 storeys – 26.9m in height

- 3.16 The proposed scale increases to the north (Block A), where the site is closest to the railway station, but steps up and down to the south to create a varied roof scape. There are large gaps between the buildings, to help moderate the effect on visual openness. Block E to the east is lower in scale (8 storeys) to preserve these sky gaps in views from the MOL to the east and west. Block A, B and C have a cruciform plan, with setbacks/ shoulders in Blocks A and C.

EFFECT OF THE PROPOSED DEVELOPMENT ON VISUAL OPENNESS, IN COMPARISON WITH THE EXISTING SITUATION

- 3.17 The assessment focuses first on the MOL to the east of the railway, which is publicly accessible. In all of the AVRs from the MOL, the lower floors of the proposed development would be screened from view by the existing mature woodland, which provides deep and dense screening. In view 1, the lower 5 floors are screened from view.
- 3.18 Nevertheless, the upper floors of the buildings would be visible in views from MOL, and would be a very noticeable change from the existing gas holders, given the open character of the land and low scale residential development in the surrounding area. While the existing gas holders are industrial structures which are of a large scale and volume, they are visually permeable. Replacing the gas holders with the proposed buildings would therefore increase the sense of enclosure in this part of the MOL, because they are solid structures, one of which is located outside the footprint of the existing gas holders. The proposed buildings would also introduce a very noticeable change to the skyline in views from the MOL directed towards the site. There would therefore be a marked level of harm to the visual openness of the MOL.
- 3.19 “Substantial harm” to MOL is not defined in policy or guidance, but is clearly a very high test. The level of harm of the MOL as a result of the proposed development is not considered to be substantial for the following reasons:
- a. The adjacent MOL parcels are extensive, which limits the impact. For example in view 1, around a third of the horizon would change as a result of the proposed development; however, this viewpoint is focused on the site. A slight twist of the neck to left or right, or reorientation of the body would reveal views across extensive tracts of MOL with an unchanged horizon.
 - b. The gaps between the proposed buildings create sky gaps in many of the views from the MOL, which allow visual connections across the MOL between the buildings.
 - c. The variation in the scale of the proposed buildings and set backs in Blocks A and C slightly reduce the effect on the MOL.
- 3.20 The role of the sky gaps between the proposed buildings changes across the MOL. The gaps are greatest in locations perpendicular to the row of proposed buildings, for example in views 2, 11 and 14 from Joseph Hood Memorial Playing Fields and the Equestrian Centre. As one moves further to the north or south the gaps reduce, for example in view 12. In some places the proposed buildings visually coalesce, for example Blocks C, D and E in view 1 to the north, and in the near view 21 to the north. Where visual coalescence occurs, this increases the effect on visual openness in these locations. However, there would be sky gaps between the buildings in views from the majority of the MOL.
- 3.21 The extent of woodland screening also varies across the MOL. There are also locations in the MOL where the existing woodland screens more of Block E, for example in view 2, where only the parapet is visible. In a near views woodland in the foreground screens more of the proposed buildings (see view 21).
- 3.22 In the private views from the MOL parcel directly west of the railway, the effects are similar as those to the east, as illustrated by the non-verified VUCity model shots reproduced in **Appendix 4**. There would be clear sky gaps between the proposed buildings across the majority of the MOL parcel, but with more visual coalesce to the north and south. The screening effect of trees would be less than in views from the east, but increase in the nearer views. There would be a

marked level of harm to the visual openness of the MOL parcel to the west of the site. However, this would not be substantial, for the same reasons set out above.

EFFECT OF THE PROPOSED DEVELOPMENT ON VISUAL OPENNESS, IF THE GAS HOLDERS HAD BEEN DEMOLISHED

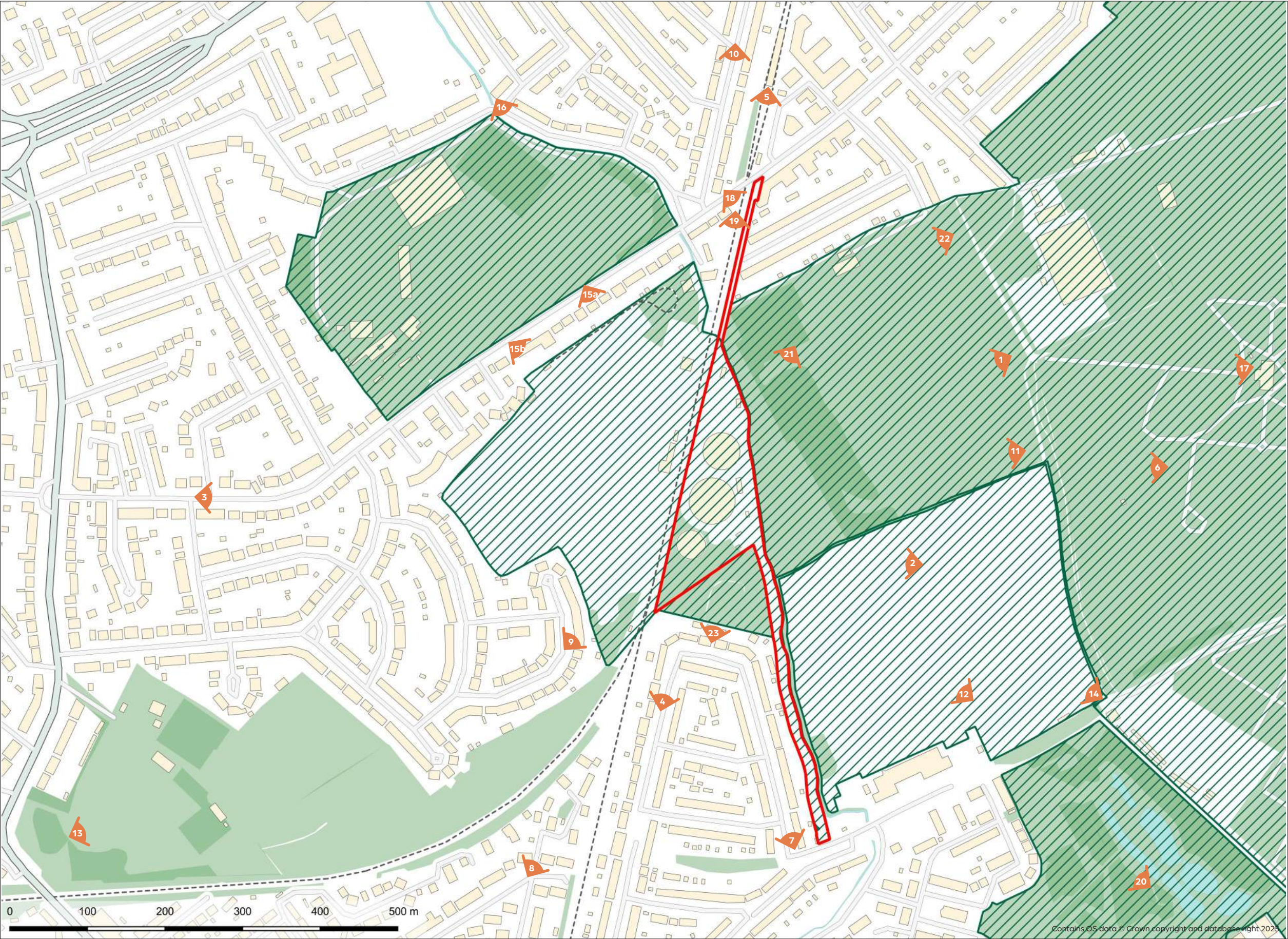
- 3.23 There is an Ofgem requirement to demolish gas holders across the country by 2029, so this section considers the impact on the visual openness of the MOL if the gas holders were demolished.
- 3.24 As set out above, the existing gas holders have a noticeable effect on the visual openness of the MOL. Therefore, in comparison with a cleared site, the proposed development would have a greater effect on the visual openness than in comparison with the existing condition.
- 3.25 However, the increase in the relative level of harm would be slight, and is not considered to be substantial, for the following reasons:
- a. The light weight structure and visual permeability of the existing gas holders restricts the effect on the visual openness of the MOL, which limits the difference between the existing situation and cleared site.
 - b. The adjacent MOL parcels are extensive, which limits the impact.
 - c. The gaps between the proposed buildings create sky gaps in many of the views from the MOL, which allow visual connections across the MOL between the buildings.
 - d. The variation in the scale of the proposed buildings and set backs in Blocks A and C slightly reduce the effect on the MOL.

CONCLUSION

- 3.26 Given their scale and volume, the existing gas holders have a noticeable effect on the openness of the MOL. However, the physical extent of the gas holders is limited in comparison with the large area of MOL in which are located. The gas holders are also redundant so cannot be filled, and the guide frames are light weight and visually permeable. This limits the effect of the existing gas holders on the visual openness of the MOL.
- 3.27 The proposed development includes five new buildings ranging from 8 to 16 storeys. The proposed buildings are solid structures, some of which are located outside the footprint of the existing gas holders. The proposed buildings would introduce a very noticeable change to the skyline in views from the MOL directed towards the site. There would therefore be a marked level of harm to the visual openness of the MOL.
- 3.28 Given the expansiveness of the views across the land, the scheme would only screen a relatively small part of the horizon line in the context of the MOL as a whole. The area of woodland and the vegetation along the railway line would soften the scheme's impacts. The gaps between the proposed buildings allow visual connections through the MOL. The variation in the scale and set backs further soften the effect. For these reasons, the harm would not be substantial.
- 3.29 This conclusion would also apply to a cleared site, for the same reasons, and because the visual permeability of the existing gas holders limits the difference between the existing situation and cleared site.

APPENDIX 1.0

METROPOLITAN OPEN LAND AND VIEWPOINT LOCATION PLAN



**VIEW LOCATION PLAN
LOCAL VIEWS**

- Application Site
- Metropolitan Open Land
- 1. Sir Joseph Hood Memorial Playing Field near Cemetery Entrance
- 2. Paddocks Permissive Footpath
- 3. Motspur Park (Close to junction with Purbeck Avenue)
- 4. Kingshill Avenue
- 5. Motspur Park Train Station Footbridge
- 6. Morden Cemetery (Close to Plot G1)
- 7. Corner of Green Lane and Kingshill Avenue
- 8. Mayfair Avenue (Close to junction with Broadmead Avenue)
- 9. Bargate Close
- 10. Claremont Avenue (Close to junction with Consfield Avenue)
- 11. Rockhunter VP 12 / Sir Joseph Hood Memorial Playing Field
- 12. Rockhunter VP 20/ Southern End of Paddocks Permissive Footpath
- 13. Entrance from Malden Road into Manor Park (RBKuT Important View 120)
- 14. Lower Morden Equestrian Centre
- 15. a) Next to No. 124 Motspur Park
b) Next to No. 98 Motspur Park
- 16. Blakes Lane in front of Horticultural Society – Added (RBKuT Important View 121A)
- 17. North East Surrey Crematorium
- 18. West Barnes Lane at railway crossing
- 19. West Barnes Lane at northern site entrance
- 20. Mayflower Park Wetlands
- 21. In front of Sir Joseph Memorial Wood board
- 22. Northeast corner near Marina Avenue
- 23. Allotments, north of Kingshill Avenue

LOCATION:
Motspur Park Gas Holders

DATE:
April 2025

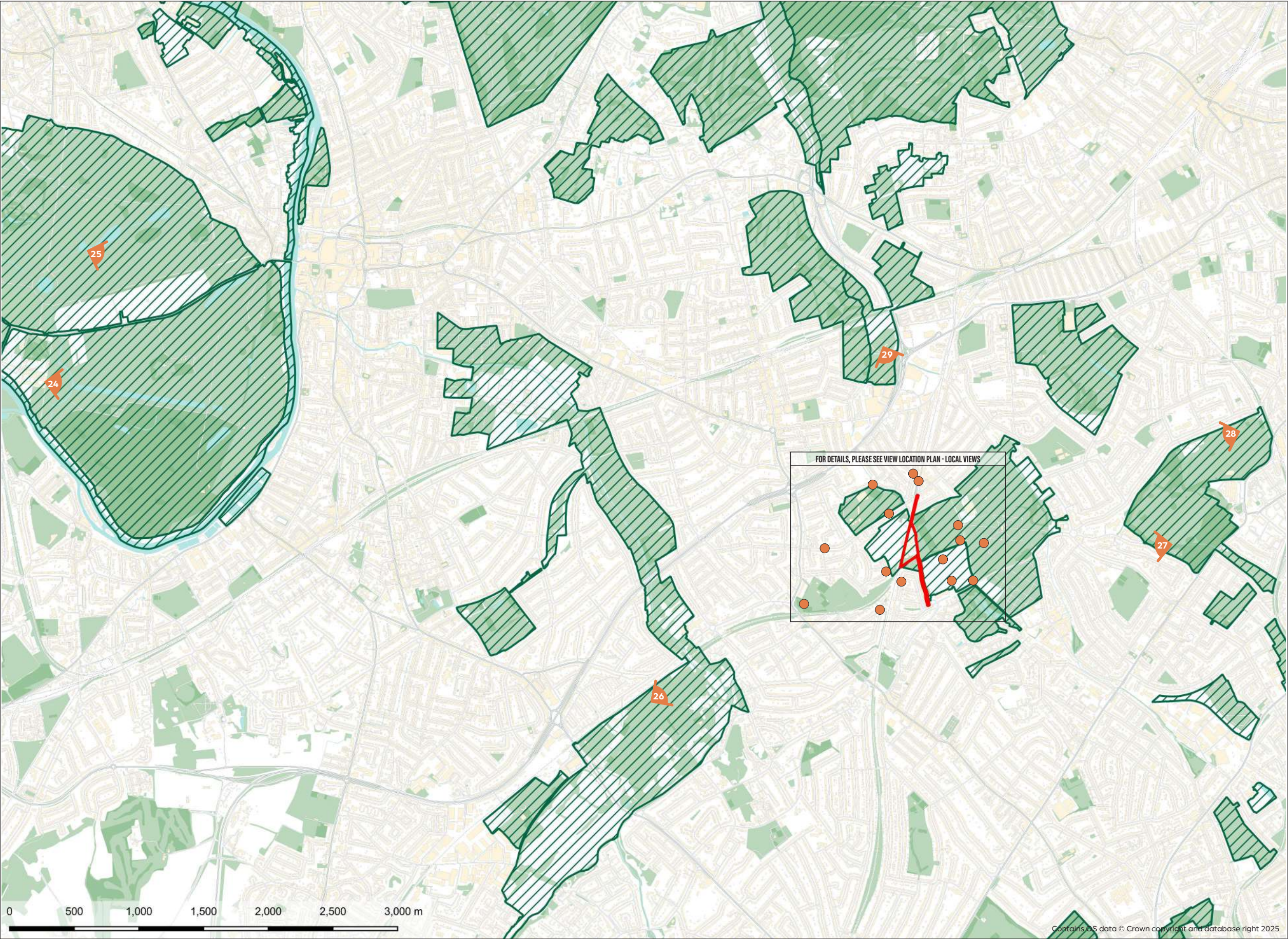
SCALE:
1:5,000 @ A3

FIGURE:



NORTH



MONTAGU EVANS
CHARTERED SURVEYORS
70 ST MARY AXE,
LONDON, EC3A 8BE
T: +44 (0)20 7493 4002
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**VIEW LOCATION PLAN
DISTANT VIEWS**

-  Application Site
-  Metropolitan Open Land
- 24. VHIV2 Hampton Court Palace 1st Floor Drawing Room, Long Water Vista (HLA 4D)
- 25. VHIV6 West side of Heron Pond in Bushy Park and looks east (HLA 145)
- 26. Worcester Park, near Sunray Estate community centre
- 27. Morden Park, west lawn near cricket ground
- 28. Morden Park, east lawn/near old tennis court
- 29. Blagdons Sports Ground

LOCATION:
Motspur Park Gas Holders

DATE:
April 2025

SCALE:
1:5,000 @ A3

FIGURE:

 **NORTH**



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APPENDIX 2.0

EXISTING AND PROPOSED AVR VIEWS FROM MOL

VIEW 1



Existing



Proposed

VIEW 2



Existing



Proposed

VIEW 11



Existing

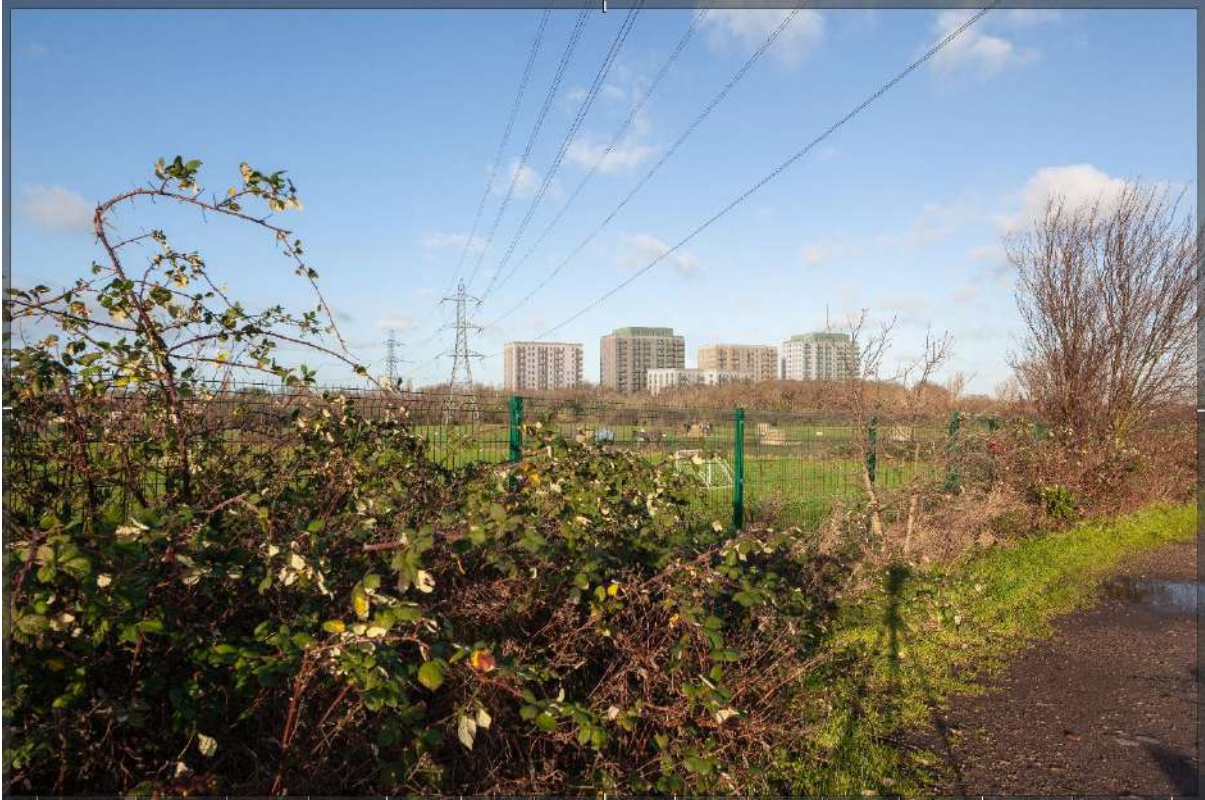


Proposed

VIEW 12



Existing



Proposed

VIEW 14



Existing



Proposed

VIEW 16



Existing

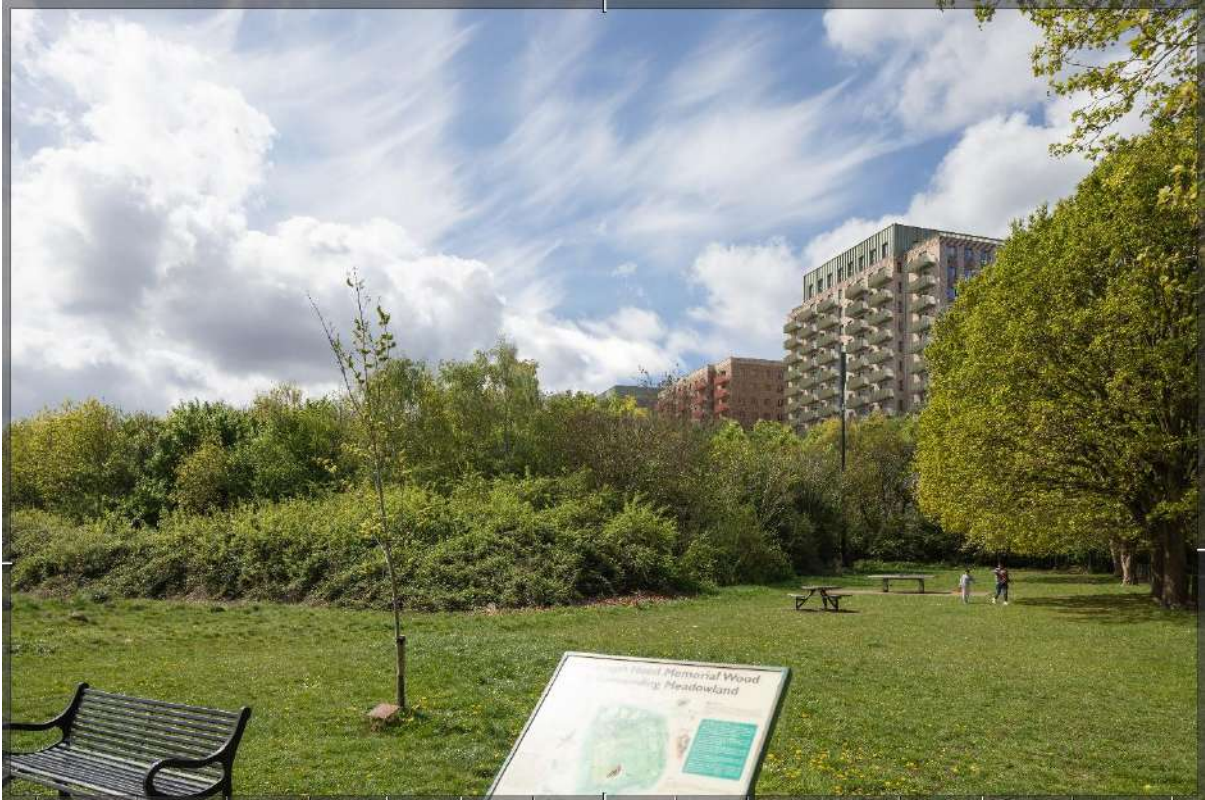


Proposed

VIEW 21



Existing



Proposed

VIEW 22



Existing



Proposed

APPENDIX 3.0

**EXISTING AND
PROPOSED
NONVERIFIED VIEWS
FROM MOL (VIEWS
6 AND 17 AND TO
THE WEST OF THE
RAILWAY (PRIVATE
LAND))**

View 6



Existing



Proposed

View 17



Existing



Proposed



VP4

VP1

VP3

VP2

VIEWPOINT 1

EXISTING





VIEWPOINT 2

EXISTING



VIEWPOINT 2

PROPOSED



VIEWPOINT 3

EXISTING



VIEWPOINT 3

PROPOSED



VIEWPOINT 4

EXISTING



VIEWPOINT 4

PROPOSED



MONTAGU EVANS

70 ST MARY AXE

LONDON

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WE CONSIDER OUR CREDENTIALS, HOW WE HAVE STRUCTURED OUR BID AND OUR PROPOSED CHARGING RATES TO BE COMMERCIALY SENSITIVE INFORMATION.
WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL.

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