ES VOLUME 2: TOWNSCAPE AND VISUAL IMPACT ASSESSMENT

MOTSPUR PARK GAS HOLDERS

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Written by: Lucy Markham, Thomas Bender and Izzy Mayhew

Any enquiries should be directed to:
Montagu Evans
70 St Mary Axe,
London, EC3A 8BE
Tel: +44 (0)20 7493 4002

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EXECUTIVE SUMMARY/ NON-TECHNICAL SUMMARY

Montagu Evans has been instructed by Berkeley Homes (West London) Limited (hereafter referred to as the 'Applicant') to provide consultancy services and produce this Townscape and Visual Impact Assessment (the 'TVA') in relation to the proposed development which is subject to a detailed application for the redevelopment of the former Motspur Park gasholder site.

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 ('LBM').

This report provides an assessment of the impact of the proposed development at Motspur Park on townscape and visual receptors.

'Townscape and Visual' are treated as individual disciplines and separate assessments are provided in accordance with legislation, planning policy and best practice guidance. The townscape and visual assessment has been carried out in accordance with the Guidelines for Landscape and Visual Impact Assessment, Third Edition (Landscape Institute and Institute of Environmental Management and Assessment, 2013).

The assessment and design development has been informed by Accurate Visual Representations 'AVRs' prepared by visualisation consultants, Rockhunter. The massing studies are appended to this report. The location of the viewpoints has been informed by architectural and historic accounts of the area, an appraisal of the existing Site and surroundings, and planning policy.

ASSESSMENT METHOD

The full assessment methodology for each discipline (landscape, townscape and visual) is provided at **Section 2.0**.

The assessment methodology is based on best practice and industry guidance. It relies on a mix of quantitative information and qualitative professional judgements which are based on research and experience.

The overarching assessment framework for all topics has followed a four-step process:

1. Baseline Assessment of Value;
2. Assessment of Sensitivity;
3. Assessment of Magnitude of Impact; and
4. Assessment of Scale of Likely Effect.

This approach is applied to both the activities involved at the demolition and construction stage and the completed development stage.

The first stage is an assessment of value. This is undertaken in the baseline. It identifies the value of a receptor (townscape or visual) on a scale which ranges from Very Low, Low, Medium or High. A definition for each value judgement is provided in the methodology to guide the assessment which is based upon best practice and professional judgements.

The second to fourth stages are undertaken at assessment stage.

The first part of the assessment, and second stage of the overall process, is to judge the susceptibility and sensitivity of the value of the receptor to the change which would arise from the development. Like value, susceptibility is judged to be Low, Medium or High based on definitions provided in the methodology. The susceptibility is then calibrated using a matrix to the value of the receptor. This calibration results in its sensitivity to the proposed development: Low, Medium or High.

The third stage is to describe the magnitude of impact on the receptor. The magnitude of impact is given as a scale – Nil, Very Low, Low, Medium and High – which is defined in the methodology and based on qualitative judgements. The magnitude of impact is calibrated with the sensitivity of the receptor, and this results in the likely effect. The likely effect range from None, Negligible, Minor, Moderate or High.

It is worth noting that a magnitude of impact which is Nil would always result in a likely effect of None.

The fourth and final stage of the methodology is to judge whether the likely effect is Beneficial, Neutral or Adverse, i.e. the nature of the likely effect. A judgement as to the nature of the likely effect is made for all effects which are Negligible or above.

A likely effect is only considered to be significant if the likely effect is Moderate Beneficial/Adverse or Major Beneficial/Adverse.

SITE DESCRIPTION

The site is located in the suburb of Motspur Park, also known as West Barnes, in south-west London. The site is approximately 500 m from Motspur Park station. The trainline runs along the western site boundary. To the north and east runs the Beverley Brook, with the Sir Joseph Hood Memorial Recreation Ground and tennis courts beyond that. To the south the site is bounded by allotments and housing beyond that at Kingshill Avenue.

The site is part of a mosaic of open spaces which are designated Metropolitan Open Land (MOL), which is a regional designation unique to Greater London, and was introduced in 1969 in the draft Greater London Development Plan (GDLP) published by the Greater London Council (GLC) and finally approved in 1976. MOL is as a matter of policy (London Plan G3) equivalent to Green Belt.

Currently, three gas holders of no architectural or historic merit occupy the site. There is also a single storey ancillary building and other gas related infrastructure. The main site access is from West Barnes Lane to the north.

TOWNSCAPE AND VISUAL IMPACT

The key TVA consideration is the impact of the proposed development on surrounding townscape character and visual amenity.

The site under consideration is previously developed land. The Motspur Park gasholders, now decommissioned, still occupy the site.

The Site is visually and functionally divorced from its environment.

The surrounding land is largely open at the moment. The site is surrounded by dense vegetation along Beverly Brook, including mature trees and dense shrubs.

Because of the scale of what is proposed, and the site's separation from the wider area, the visual impact of the proposed development is limited largely to the views from surrounding land to the east and to a lesser extent to the private land to the west, which has extant consent for Fulham FC training facilities.

From a townscape perspective, the design of the proposed development would be complementary to the surrounding area, in the views from the east and west, and the change of outlook from private land to the new development is similar to relationships across the wider area of residential development.

Therefore, the change contemplated would be characteristic, and from a design perspective beneficial, making best use of land in a sustainable location.

HERITAGE

The site is at some distance from the closest conservation areas and listed buildings in the study area. Due to the distance and the area's topography, no heritage receptor would be affected by the proposed development, and it is scoped out of the EIA. A Heritage Statement is appended to the Environmental Statement (ES).

In summary, the proposed development would have no material impact on the setting or significance of any of the heritage assets discussed in the Heritage Statement.

SUMMARY

The proposed development has evolved through a detailed understanding of the site and its surrounding context. Design development has benefited from discussions with officers at RBKuT and LBM, plus design reviews and input by the Greater London Authority. The final design has been refined through this process and the result demonstrates a collaborative approach of highly skilled architects and a supporting consultant team.

The proposed development would give rise to significant beneficial urban design and townscape improvements to the study area, including its character and function.

1.0
INTRODUCTION
MOTSPUR PARK GAS HOLDERS

INTRODUCTION

1.1 Montagu Evans has been instructed by Berkeley Homes (West London) Limited (hereafter referred to as the 'Applicant') to provide consultancy services and produce this Townscape and Visual Impact Assessment (the 'TVA') in relation to the proposed development which is subject to a detailed application for the redevelopment of the site at Motspur Park Gasholders.

1.2 The description of development (the 'proposed development') is as follows:

"Demolition of existing gasholders and associatedabove ground structures / buildings andredevelopment to provide a residential developmentand ancillary residential facilities (C3 Use Class),together with associated works to the existingaccesses and internal vehicular routes, newpedestrian and cycle routes, the provision of newpublicly accessible open space, amenity space, hardand soft landscaping, cycle and car parking, worksto the brook embankment, [re-siting of some gasinfrastructure], ground works and plant."

1.3 The proposed development is subject to Environmental Impact Assessment (EIA). The TVA forms Volume 02 of the Environmental Statement (ES) which is submitted with the application. The assessment is undertaken in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) ('the EIA Regulations').

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 ('LBM').

1.5 The site is described at ES Volume 01: Chapter 1 and within the Design and Access Statement (DAS) prepared by Maccreanor Lavington, the architects. **Figure 1.1** shows the boundary of the site, and an aerial view is provided at **Figure 1.2**.

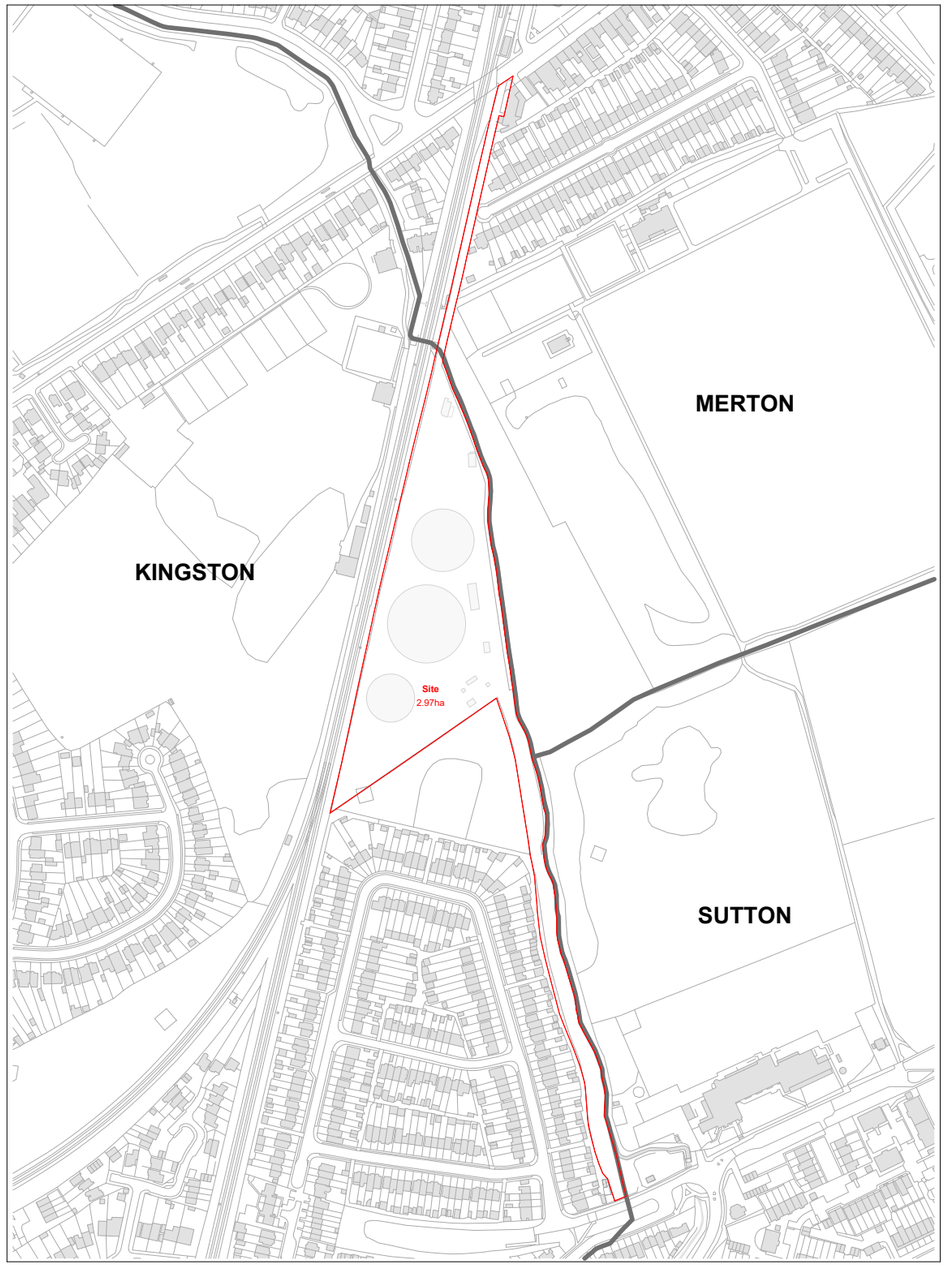

Figure 1.1 Site Plan

Figure 1.2 Aerial View. Source: Google (base map)

SITE DESCRIPTION

1.6 The site is located in the suburb of Motspur Park, also known as West Barnes, in south-west London. The site is approximately 500 m from Motspur Park station. The trainline runs along the western site boundary. To the north and east runs the Beverley Brook, with the Sir Joseph Hood Memorial Recreation Ground and tennis courts beyond that. To the south the site is bounded by allotments housing beyond that at Kingshill Avenue.

1.7 The site is part of a mosaic of open spaces which are designated Metropolitan Open Land (MOL), which is a regional designation unique to Greater London, and was introduced in 1969 in the draft Greater London Development Plan (GDLP) published by the Greater London Council (GLC) and finally approved in 1976. MOL is as a matter of policy (London Plan G3) equivalent to Green Belt.

1.8 Currently, three gas holders of no architectural or historic merit occupy the site. There is also a single storey ancillary building and other gas related infrastructure. The main site access is from West Barnes Lane to the north.

PURPOSE OF THE TVA

1.9 The key TVA consideration is the impact of the proposed development on townscape character and visual amenity.

1.10 The townscape assessment will consider the proposed development within its urban context, including the buildings, the relationships between them, the different types of urban open spaces, including green spaces and the relationship between buildings and open spaces.

1.11 The visual assessment will consider the impact of the proposed development upon visual receptors e.g. people. The assessment relates to how the amenity of people in the area affected by development will change (positive, negative or neutral). Visual receptors are always people (although usually visual receptors are defined according to use e.g. residential, business, road, footpath etc.), rather than landscape features. Impact on landscape components is treated under the heading townscape (when in cities).

1.12 The assessment as a whole is informed by visual tools, including the production of accurate visual representations ('AVRs') prepared by Rockhunter, and a zone of theoretical visibility (ZTV) diagrams and non-verified massing studies, using VU.CITY software. The tools inform the assessment of the impact of the proposed development on townscape and visual receptors e.g. they allow an understanding of the geographical extent and magnitude of visibility from representative locations. The tools are not receptors themselves, unless comprising strategic views designated in the development plan, such as the 2012 London View Management Framework.

HERITAGE

1.13 The site is not within the immediate setting of any designated heritage assets. The closest statutorily listed buildings are the Malden Green Farmhouse and the Plough Public House, both approximately 1 km away from the centre of the Site. Morden Park is a grade II* listed house, more than 2 km to the east of the Site. There are two locally listed buildings within the Fulham Football Club Training Ground, located approximately 500 m to the northwest of the site

1.14 Due to the distance and the study area's topography and the nature of the surrounding building stock, none of the receptors would be affected by the proposed development. For this reason, the Scoping Opinion agreed to scope out an assessment of built heritage.

1.15 A Heritage Statement is appended to the Environmental Statement (ES).

STRUCTURE OF THE TVA

1.16 The TVA is structured as follows:

1.16.1 The methodology for undertaking the TVA for the ES assessment is provided at **Section 2.0**;

1.16.2 Legislation, planning policy and guidance relevant to the assessment of likely effects on townscape and visual receptors is set out at **Section 3.0**;

1.16.3 A description of the historical development of the site and surrounding area is provided at **Section 4.0**;

1.16.4 A description of the existing townscape character and visual amenity is provided at **Section 5.0**;

1.16.5 A description of the existing visual amenity is provided at **Section 6.0:**

1.16.6 **Section 7.0** describes the pre-application consultation that has been undertaken and embedded mitigation that has occurred as a result of this process and design development;

1.16.7 The impact of the proposed development on townscape receptors is assessed at **Section 8.0**;

1.16.8 An assessment of the impact of the proposed development on visual receptors is provided at **Section 9.0**;

1.16.9 Mitigation and residual effects are discussed at **Section 10.0.**

1.16.10 The TVA is concluded at **Section 11.0**.

2.0 METHODOLOGY

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METHODOLOGY

2.1 This section describes the framework for the townscape and visual assessment. The method for each discipline is the product of legislation, policy and best practice guidance set out in **Section 3.0**. The assessment is proportionate and no longer than is necessary to assess properly the potential likely significant effects of the Proposed Development. All impacts deemed relevant or material to planning are identified and the consequent effects appraised.

2.2 Throughout this analysis, and across all disciplines, the reader will be presented with the words impact and effect. 'Impact' is defined as the action being taken, and 'effect' is the change resulting from the action. The overall effect is also given a nature of effect (beneficial, adverse or neutral). There is no direct correlation between magnitude of impact and nature of effect, since change is by definition not necessarily adverse or beneficial. Similarly, and dependent on context, one can have a high magnitude of impact which is neutral in effect, which may strike some readers as peculiar or perverse. For example, however, it is possible for a major change to be so similar to others that have occurred and are anticipated that practically speaking it is neither beneficial or detrimental to the value of the receiving receptor (and hence is neutral).

SCOPING AND BASELINE ASSIMILATION

2.3 This assessment is based on the Scoping Report submitted to the Council in March 2025 and agreed in June 2025. The Scoping process identified the townscape and visual receptors which would be assessed in the ES. Heritage has been scoped out of the assessment. A Heritage Statement is appended to the ES.

SITE VISITS

2.4 A field survey of the baseline situation was undertaken by Montagu Evans during spring 2023.

STUDY AREA

2.5 The study area for the TVIA comprises:

2.5.1 All heritage receptors (designated and non-designated) up to 1 km from the Site;

2.5.2 Townscape character areas up to 1 km from the Site;

2.5.3 Visual receptors up to 10 km from the Site.

2.6 The plans at the respective baseline sections identify all of the receptors identified in the study area.

2.7 Site observations, a manual desk-based review of OS maps, characterisation studies and relevant heritage receptors were used to determine the study area. It has been informed by building locations and heights, topography and townscape features, and an understanding of the scale of the Proposed Development.

2.8 A Zone of Theoretical Visibility (ZTV) has been produced to outline the potential areas where the Proposed Development may be visible, covering an area of 2 km2 with the Site at the centre (**Figure 2.1**). The ZTV has been produced using topographically referenced three-dimensional models from VU.CITY software. It is a tool for a high-level understanding of the extent of visibility, which was further interrogated through review of individual viewpoints using field surveys and digital software.

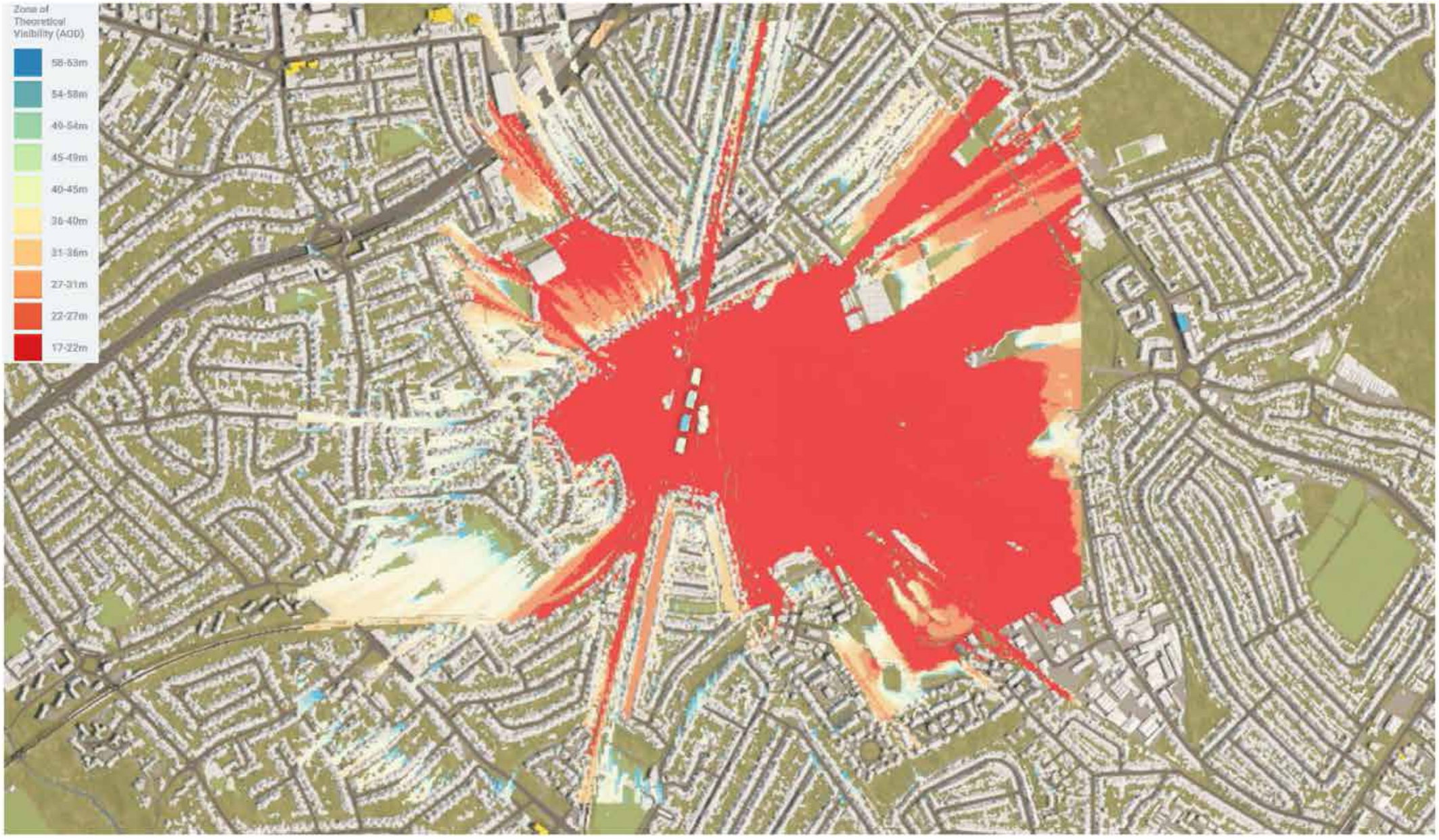


Figure 2.1 ZTV of the Proposed Development prepared using VU.CITY

ACCURATE VISUAL REPRESENTATIONS AND VISUAL AIDS

2.9 The assessment of each discipline is informed by AVRs. The location of the viewpoints has been agreed with the Council(s) during the pre-application and EIA Scoping process.

2.10 The AVRs are provided at **Appendix 1.0** in the following scenarios:

2.10.1 Existing = baseline photography

2.10.2 Proposed = Existing plus the Proposed Development

2.10.3 Cumulative = Proposed Development plus schemes in the surrounding area that are subject to an extant consent

2.11 The AVRs are independently prepared by Rockhunter according to an industry standard method provided at **Appendix 2.0**. The variables include angle of lens, framing of shot and orientation. TGN 06/19 Visual Representation of Development Proposals Technical Guidance Note (2019) prepared by Landscape Institute recommend one set of considerations, but these are not universally applied and are not suited often to certain urban environments because the angle of lens, 50 degrees, often eliminates context in close and medium-distance shots.

2.12 AVRs are merely tools of assessment, to be applied on site, and to act as aide memoires afterwards. They do not represent visual perception. The objective of an AVR is to simulate the likely visual changes that would result from a proposed development. AVRs are two-dimensional and cannot capture the complexity of the visual experience. It is an approximation of the three-dimensional visual experience the observer would receive on site. Neither do they capture transient significant effects arising from noise or traffic on perception, or that wider range of expectations and associations that anyone in an urban scene may have.

2.13 A further 10 non-verified views, prepared using VU.CITY, are provided at **Appendix 3.0**. The non-verified views further inform the assessment of the impact of the Proposed Development on heritage, townscape and visual receptors.

2.14 Artists' impressions based on geometrically accurate information (models) or characteristics of computer-generated images (CGIs) may sometimes be used. Whilst not independently verified, these can be very helpful in establishing and assessing the way a proposal will affect its immediate environment (to take one example only) and/or convey particular characteristics of development. This is because the AVR methodology is generally less helpful for assessing up close effects or, for example, in capturing the interaction of new landscape with buildings. Illustrative views are not used to inform the assessment of applications for outline permission but may be provided as a useful reference of what could be achieved through implementation of a design code.

2.15 The qualitative text accompanying the visual assessment seeks to contextualise the views. Inevitably one must accept that professional judgement is involved in this specialist area on the basis of the above and the importance of design quality in the operation of policy. A visit to the location from which the photographs were taken is required to appreciate and understand the visual impact.

2.16 Changes to visual amenity should not be judged in relation to static views (which are abstractions and not real) but in relation to the overall experience of an area and dependent upon the particular experiences and expectations of different receptors. The modelled viewpoints are often selected to show schemes at their maximum impact and not capture their typical impact in a receiving area or location. The impact assessment considers both the particular impact illustrated and the overall impact to come to a net assessment which more accurately reflects the overall experience than a single view.

TOWNSCAPE AND VISUAL

2.17 The framework for assessment of townscape and visual impact has been prepared using the Guidelines for Landscape and Visual Impact Assessment, Third Edition (Landscape Institute and Institute of Environmental Management and Assessment, 2013) ('GLVIA3'). The two components of townscape and visual assessment are:

2.17.1 The assessment of townscape effects: assessing effects on the townscape as a resource in its own right; and

2.17.2 The assessment of visual effects: assessing effects on the general visual amenity experienced by people. Specific views are also assessed where they form strategic views designated in the development plan, or where agreed with the competent authority.

TOWNSCAPE AND VISUAL VALUE

TOWNSCAPE VALUE

2.18 The townscape baseline assessment describes character areas/types and their characteristics. It defines the distinct and recognisable patterns of elements, or characteristics that make one area different from another, rather than better or worse. Areas are defined and mapped with boundaries that suggest a sharp change from one townscape area to another; however, on site, changes can be more subtle and practically, this often represents a zone of transition. Criteria to assess townscape character areas and apportion value is contained in **Table 2.1**.

2.19 Assessment is informed by an understanding of how an area has evolved, the use of aerial photography and field survey, along with desk-based research as appropriate and to a level commensurate with the sensitivity of the receptor and its susceptibility to change. Important published sources will normally comprise formal character assessments prepared, for example, as part of local plan making or agencies or county authorities.

2.20 The objective of identifying the existing context is to provide an understanding of the townscape in the area that may be affected – its constituent elements, its character and the way this varies spatially, its geographic extent, its history, its condition, the way the townscape is experienced and the value attached to it. This assessment cannot practically and objectively capture what local people in an area feel about their area (unless of course this has been subject to a specific study which is produced in an objective or reflective manner). Thus, this value analysis reflects professional judgment.

TOWNSCAPE RECEPTOR VALUE			
Value	Importance	Typical Criteria	Typical Features / Characteristics
Very High	International / National	Unique or outstanding townscape with clearly distinctive characteristics, features and elements; Widespread use of quality materials; Very strong urban structure, characteristic patterns and balanced combination of built form and open space; Appropriate management for land use; No, or very limited, detracting features.	International or national designation, and/or designated heritage receptors of significant importance
High	National / Regional / Local	Distinctive or unusual townscape with notable features and elements; Evident use of quality materials; Strong urban structure, characteristic patterns and balanced combination of built form and open space; Appropriate management for land use with limited scope to improve; Limited detracting features.	National or regional designation, and/or designated heritage receptors
Medium	Regional / Local	Attractive townscape with occasional distinctive features; Recognisable urban structure, characteristic patterns and combinations of built form and open space; Scope to improve management for land use; Some detracting features.	Regional or local recognition, including local plan designations, with value possibly expressed through literature and cultural associations.
Low	Local	Commonplace or ordinary townscape with limited variety or distinctiveness; Distinguishable urban structure, characteristic patterns and combinations of built form and open space, although often fragmented; Scope to improve management or land use; Potentially some dominant detracting features and areas of very low value.	Some positive townscape features but largely degraded and may benefit from regeneration, restoration or enhancement.
Very Low	Local	Very common townscape, often in decline; Weak or degraded urban structure, characteristic patterns and combination of built form and open space; Lack of management has resulted in degradation; Frequent dominant detracting features; Disturbed or derelict land requires treatment.	Heavily degraded townscape and/or identified for change.

Table 2.1 Townscape Receptor Value Criteria

VISUAL AMENITY VALUE

2.21 The visual baseline assessment established the area in which the development may be visible, the different groups of people who may experience views of the development, the places where they will be affected and the nature of the views and visual amenity at those points.

2.22 The baseline study identifies individuals and/or defined groups of people within the area who will be affected by changes in the views, 'visual receptors'. The following visual receptors are identified by GLVIA3 as being likely to be the most susceptible to change:

2.22.1 Residents and other frequent users of the area;

2.22.2 People, whether residents or visitors, who are engaged in outdoor recreation, including use of public rights of way, attractions or those whose attention or interest is likely to be focused on the landscape and on particular views; and

2.22.3 Communities where views contribute to the landscape setting enjoyed by residents in the area.

2.23 Representative viewpoints are identified based on a comprehensive review of the surrounding area, including the following criteria:

2.23.1 Heritage receptors;

2.23.2 Townscape character;

2.23.3 Where the development may be prominent;

2.23.4 Be visible from concentrations of residential areas;

2.23.5 Open spaces (parkland, publicly accessible space);

2.23.6 Potentially sensitive receptors (e.g. schools);

2.23.7 Accessibility to the public;

2.23.8 The viewing direction, distance and elevation;

2.23.9 Townscape and transport nodes.

2.24 The identification of viewpoints also considers any strategic or local viewpoints identified by the local planning authorities or other relevant bodies.

2.25 The visual amenity value of locations is assessed using the criteria contained in **Table 2.2**. Amenity is a broad concept in planning, and the Planning Portal [online] defines it as "*A positive element or elements that contribute to the overall character or enjoyment of an area. For example, open land, trees, historic buildings and the inter-relationship between them, or less tangible factors such as tranquillity.*" Changes in amenity are typically assessed through changes to what people see and perceive, and the shorthand for this are 'views' and 'visual impact'.

2.26 The places at which or in which these individuals will experience a change will always be a publicly accessible place, in line with best practice. The visual assessment is therefore separate to a 'residential amenity assessment', which considers private viewpoints from residential properties (refer to GLVIA3, paragraph 6.17). In some instances, the visual impact assessment will address impacts from private land, but that is only where this topic has been scoped with the decision maker and a specific methodology agreed. Such private land amenity assessments often rely on other concepts in town planning/measures such as privacy and enclosure or overbearing.

VISUAL AMENITY VALUE

Value	Criteria / Examples
Very High	Areas of national or international importance and/or identified strategic views of national or international importance. Very enjoyable area with multiple positive elements and/or Very High townscape value.
High	Areas of national or regional importance, or particular local importance and/or static view identified in the development plan. Enjoyable area with several positive elements and/or High townscape value.
Medium	Areas of regional or local importance and/or static view identified in planning guidance, including conservation area appraisals. Pleasant area with some positive elements and/or Medium townscape value.
Low	Commonplace areas with limited positive elements and/or Low townscape value, often with detracting elements.
Very Low	Area of Very Low townscape value (e.g. industrial areas/busy main roads) that has very few positive characteristics, usually with significant detracting elements.

Table 2.2 Visual Amenity Value Criteria

TOWNSCAPE AND VISUAL SUSCEPTIBILITY

2.27 The first stage in the assessment of the Proposed Development on a townscape or visual receptor is to identify its sensitivity to the Proposed Development. Sensitivity is identified by calibrating the baseline value of the receptor with its susceptibility, defined as the ability to accommodate the particular type and/or nature of development without undue consequences for the maintenance of the baseline situation and/or the achievement of planning policies and strategies. The criteria for determining townscape susceptibility is described at **Table 2.3** and visual susceptibility at **Table 2.4**.

TOWNSCAPE SUSCEPTIBILITY

2.28 GLVIA3 explains landscape susceptibility at pages 88–89. There is no specific definition of townscape susceptibility. Professional judgement is applied based on the understanding of landscape susceptibility to reach judgements on townscape susceptibility.

2.29 GLVIA3 describes susceptibility to change of landscape receptors as "*the ability of the landscape receptor (whether it be the overall character or quality/condition of a particular landscape type or area, or an individual element and/or feature, or a particular aesthetic and perceptual aspect) to accommodate the proposed development without undue consequences for the maintenance of the baseline situation and/or the achievement of landscape planning policies and strategies.*"

2.30 Susceptibility is relative to the general type of development proposed e.g. a receptor may be more or less susceptible to a proposal for an industrial facility as opposed to a residential building depending on the receiving environment. Equally, a receptor may be more or less susceptible to a tall building than a low-rise development depending on the receiving environment.

2.31 Effects are particular to the specific landscape / townscape in question, which includes reference to aspects such as the quality, nature and condition of the receptor, or, existing scale and grain e.g. if the existing townscape is of a similar scale and / or grain as the proposed development, it may have a greater ability to accommodate the proposed development and thus a lower susceptibility to change, subject to those existing characteristics not undermining or undue consequence arising from that baseline condition or anticipated achievement of relevant townscape / landscape planning policies, which includes site allocations or anticipated development identified in the statutory development plan.

TOWNSCAPE SUSCEPTIBILITY TO CHANGE CRITERIA	
High	The receptor has a low ability to accommodate the specific proposed change e.g. the existing townscape / landscape comprises very limited or no similar types of development to that proposed and/or the townscape / landscape policies do not anticipate this type of development.
Medium	The receptor has a moderate ability to accommodate the specific proposed change e.g. the existing townscape / landscape comprises some similar types of development to that proposed and/or the townscape / landscape policies anticipate some of this type of development.
Low	The receptor has a high ability to accommodate the specific proposed change e.g. the existing townscape / landscape comprises several similar types of development to that proposed and/or the townscape / landscape policies anticipate this type of development.

Table 2.3 Susceptibility of Townscape Receptor to Change Criteria

VISUAL SUSCEPTIBILITY

2.32 GLVIA3 explains visual susceptibility at pages 113–114. Page 113 sets out that susceptibility of different visual receptors to changes in views and visual amenity is mainly a function of:

2.32.1 The occupation or activity of people experiencing the view at particular locations;

2.32.2 The extent to which their attention or interest may therefore be focused on the views and the visual amenity they experience at particular locations.

2.33 Visual receptors who are more likely to have a high susceptibility to change include residents at home, people who are engaged in activities that involve an appreciation of the surrounding landscape or townscape, and visitors to heritage assets or other attractions. This is the advice of GLVIA3; however, the guidance also makes it clear that this will not be true in all cases since susceptibility to change is to some extent, as noted, a function of context.

2.34 Again, and subject to that qualification, visual receptors who are more likely to have a low susceptibility to change include users of amenity space that does not depend on or involve an appreciation of the surrounding landscape / townscape such as people engaged in sports activities. GLVIA3 states that "*each project needs to consider the nature of the groups of people who will be affected and the extent to which their attention is likely to be focused on views and visual amenity*."

VISUAL SUSCEPTIBILITY TO CHANGE CRITERIA	
High	The receptor has a low ability to accommodate the specific proposed change e.g. the visual receptor is likely to be heavily engaged on the view/visual amenity and/or the type of development is incongruent to the baseline condition or would undermine the enjoyment of the visual receptor.
Medium	The receptor has a moderate ability to accommodate the specific proposed change e.g. the visual receptor is likely to be partially engaged on the view / visual amenity and/or the type of development is congruent to aspects of the baseline condition or would undermine some aspects of the enjoyment of the visual receptor.
Low	The receptor has a high ability to accommodate the specific proposed change e.g. the visual receptor is likely to be not engaged on the view / visual amenity and/or the type of development is congruent to the baseline condition or would not undermine the enjoyment of the visual receptor.

Table 2.4 Susceptibility of Visual Receptor to Change Criteria

TOWNSCAPE AND VISUAL SENSITIVITY

2.35 The baseline value of the receptor and its susceptibility are calibrated using the matrix at **Table 2.5**. Sensitivity is recorded in a verbal scale (high, medium or low), supported by the clear narrative linked to evidence from the baseline study and an assessment of susceptibility.

TOWNSCAPE AND VISUAL SENSITIVITY			
Receptor Value	Susceptibility of Receptor to Change		
	Low	Medium	High
Very Low	Low	Low	Low/Medium
Low	Low	Low/Medium	Medium
Medium	Low/Medium	Medium	Medium/High
High	Medium	Medium/High	High
Exceptional	Medium/High	High	High

Table 2.5 Townscape and Visual Sensitivity (Nature of Receptor Likely to be Affected)

TOWNSCAPE AND VISUAL MAGNITUDE

2.36 The magnitude of impact is a qualitative judgement supported by the narrative text within the assessment. The professional judgement is quantified using criteria at **Table 2.6**. The judgement of magnitude considers the size or scale, geographical extent or duration and reversibility of the impact.

TOWNSCAPE AND VISUAL MAGNITUDE OF IMPACT	
High	Major change to the value of the townscape receptor or visual amenity. The proposals would be very noticeable, comprising a notable change over an extensive area or an intensive change over a more limited area. May comprise major alteration to key elements/features/characteristics of the receptor. The duration of this impact may be permanent and non-reversible.
Medium	Moderate change to the value of the townscape receptor or visual amenity. The proposals would be noticeable, comprising a recognisable change over a large area or a moderate change over a more limited area. May comprise alteration to one or more key elements/features/characteristics of the receptor. The duration of this impact may be semi-permanent and partially reversible.
Low	Minor change to the value of the townscape receptor or visual amenity. The proposals would be noticeable, although comprising a small change over a limited area or similar to a main component of the receptor. May comprise minor alteration to one or more key elements/features/ characteristics of the receptor. The duration of this impact may be temporary and reversible.
Very Low	Barely discernible change to the value of the townscape receptor or visual amenity. The proposals would not be noticeable, although comprising a very small change over a very limited area or very similar to the main components of the receptor. May comprise very minor alteration to one or more key elements/features/characteristics of the receptor. The duration of this impact may be temporary and reversible.
Nil	No change to the value of the townscape receptor or visual amenity.

Table 2.6 Magnitude of Impact Criteria

TOWNSCAPE AND VISUAL LIKELY EFFECTS

2.37 Likely effects are determined by combining the judgements of sensitivity and the magnitude of impact using a common matrix shared across all topic areas (**Table 2.7**). It is generally considered that moderate to major effects are considered 'significant' in the context of the EIA Regulations. Criteria defining the scale of effect is provided at **Table 2.8**.

TOWNSCAPE AND VISUAL LIKELY EFFECT ON RECEPTOR			
Magnitude	Sensitivity		
	Low	Medium	High
Nil	None	None	None
Very Low	Negligible	Negligible	Negligible / Minor
Low	Minor	Minor / Moderate	Moderate
Medium	Minor / Moderate	Moderate	Moderate / Major
High	Moderate	Moderate / Major	Major

Table 2.7 Likely Effect on Receptor Matrix

2.38 Professional judgement is required to determine the nature of the likely effects. Criteria defining the nature of effect is provided at **Table 2.9.** For example, there will be cases where a high magnitude of impact produces a major scale of effect, on the basis that the component is prominent or noticeable, but notwithstanding that the quality of effect is beneficial as a consequence of design quality or other benefits. This approach arises most often as a consequence of major developments in areas positively identified for transformational change. Often, such impacts will have varied effects such that a hard and fast categorisation of an effects quality is finely balanced as between beneficial or harmful. In many instances, therefore, the final identification of impact and effect will turn on discursive analysis. This makes a necessary professional adjustment to the tabular analysis format which can produce inaccurate reporting.

TOWNSCAPE AND VISUAL SCALE OF AN EFFECT	
Major	The change resulting from the impact of the Proposed Development upon the receptor would give rise to a very significant effect.
Moderate	The change resulting from the impact of the Proposed Development upon the receptor would give rise to a significant effect.
Minor	The change resulting from the impact of the Proposed Development upon the receptor would give rise to an effect, but this would not be significant.
Negligible	The change resulting from the impact of the Proposed Development upon the receptor would give rise to a barely discernible effect. This would not be significant
None	The change resulting from the impact of the Proposed Development upon the receptor would have no effect.

Table 2.8 Scale of an Effect

2.39 The assessment of nature of effect also requires a qualitative discussion to describe and elucidate this judgement to the reader. This is necessary because townscape and visual assessment is not a strict quantitative process and some of these considerations will depend on expert judgements. Accordingly, there is an emphasis on qualitative text throughout the assessment to describe the receptors and the judgements in regard to the significance of the identified effects.

TOWNSCAPE AND VISUAL NATURE OF AN EFFECT	
Beneficial	An advantageous effect to a receptor
Neutral	An effect that on balance is neither beneficial nor adverse to a receptor.
Adverse	A detrimental effect to a receptor

Table 2.9 Nature of an Effect

CUMULATIVE EFFECTS

2.40 The cumulative scheme for inclusion in this Volume were provided by the EIA coordinator, Ramboll.

2.41 This is the Former BBC Sports Ground Motspur Park New Malden KT3 6PF (Ref: 18/15124/FUL, amended under S96a, Ref: 22/03170/NMA). This permission comprises the following development which is situated immediately to the west of the Site.

> *Demolition of existing derelict buildings, erection of a two-storey building to provide essential welfare, changing, sports science and ancillary office facilities (Class D2). Erection of a single storey security building, security gate cabin and alterations to existing buildings to allow use for storage of groundsman's equipment (Class D2). Provision of CCTV, floodlighting, refurbishment/repair works to internal access roads, reconfiguration of car park and service layout. Pitch enhancement works consisting of 5no. full sized football pitches, 2no. goalkeeping training areas and 3no. fast feet training areas, including alterations to levels, pitch construction and subsoil, replacement drainage, ducting for services including under soil heating, pitch irrigation, associated fencing and ball stop netting, boundary treatments and hard and soft landscaping. All works are associated with the continued use of the site for sporting purposes (Use Class D2).*

2.42 The redevelopment of the Tesco car park at New Malden (Sterling Place) by Barratt is nearing completion and therefore included in the baseline condition.

2.43 A GLVIA3 sets out two main approaches to inter-project effects between any given proposed development and cumulative schemes (See GLVIA, paragraph 7.18). The first approach is to focus:

> *primarily on the additional effects of the main project under consideration… on top of the cumulative baseline*

2.44 The second approach is to focus:

> *on the combined effects of all the past, present and future proposals together with the new project*

2.45 This assessment takes the first approach, which is to focus on the additional effects of the Proposed Development on top of the cumulative baseline. It is considered that this approach is best suited to an urban environment, in which the cumulative effects between the Proposed Development and other cumulative schemes may be complex (including situations in which the effect of the Proposed Development could be lessened or removed entirely by cumulative schemes) and because, as also acknowledged in the GLVIA3, it may not be considered reasonable to assess the effect of many complex schemes other than the Proposed Development in the manner required by the 'combined effects' approach.

MITIGATION

2.46 Mitigation measures proposed to prevent, reduce or offset any significant likely adverse effects have been identified and developed as part of the pre-application design process. The primary mitigation measures have become embedded into the project design, commonly referred to as embedded mitigation. The mitigation arising from design development and consultation responses is identified at **Section 7.0**.

2.47 The likely effects of the proposed development include embedded mitigation. As a result, there is no requirement for additional mitigation and thus likely residual effects remain the same as the likely effects, unless otherwise stated.

CLIMATE CHANGE

2.48 The likely effects of the proposed development are defined under the current climate conditions, which may alter under a future climate scenario. The EIA Regulations require that the change in impact magnitude and a receptor's 'vulnerability' (i.e. susceptibility or resilience to change) are considered in respect of a future climate condition.

2.49 The vulnerability of the receptors according to the definitions provided in the guidance, and it has been judged that all of the heritage, townscape and visual receptors have low vulnerability.

2.50 The likely projected future conditions for each of temperature, precipitation, wind speed and cloud cover have been considered. It is considered that the magnitude of impact and resultant nature and scale of the effects of the proposed development during the operational phase will not be changed under the future climate conditions.

2.51 Overall, the likely effects of the proposed development are unlikely to change as a result of climate change.

FUTURE BASELINE

2.52 This TVA assesses the proposed development against the existing scenario with the gasholders currently present on the site.

2.53 The findings of the assessment of an alternative future baseline in which the demolition and clearance of the site has already been undertaken is presented at **Appendix 4.0**.

3.0
LEGISLATION AND PLANNING POLICY
MOTSPUR PARK GAS HOLDERS

LEGISLATION AND PLANNING POLICY

3.1 This section sets out the planning policy context for the redevelopment of the Site, including national and local guidance.

DEVELOPMENT PLAN

3.2 An application is determined in accordance with the policies of the statutory development plan, which here comprises the plans set out below in the table. Policies pertaining to this topic area are included in the right-hand column of the table below (**Table 3.1**).

DEVELOPMENT PLAN POLICY	KEY PROVISIONS
London Plan (2021)	**Chapter 1** (Planning London's Future – Good Growth): GG2 **Policy D1** (London's form character and capacity for growth) **Policy D3** (Optimising site capacity through the design-led approach) **Policy D4** (Delivering good design) **Policy D5** (Inclusive design) **Policy D8** (Public realm) **Policy D9** (Tall Buildings)
RBKuT Core Strategy (2012)	Policy CS 8 Character, Design and Heritage Policy DM 10 Design Requirements for New Developments (including House Extensions) Policy DM 11 Design Approach
LBM Local Plan (November 2024)	Strategic policy D12.1 Delivering well-designed and resilient neighbourhoods Policy D12.2 Urban design Policy D12.3 Ensuring high quality design for all developments

Table 3.1 Development Plan Policy

NATIONAL POLICY

3.3 National planning policy as set out in the NPPF comprises a material planning consideration. The relevant provisions are set out at **Table 3.2**.

NATIONAL POLICY	KEY PROVISIONS
National Planning Policy Framework (NPPF) 2024, as edited in February 2025	Chapter 2: Achieving sustainable development Chapter 11: Making effective use of land Chapter 12: Achieving well designed places • Paragraph 131 • Paragraph 135–139

Table 3.2 National Planning Policy

MATERIAL CONSIDERATION

3.4 In addition to legislation and policy, the assessment will take into consideration relevant planning guidance and any material considerations, including:

- National Planning Practice Guidance (online)[1];
- Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA) (2013)[2];
- An Approach to Landscape Character Assessment (2014)[3];
- TGN 06/19 Visual Representation of Development Proposals Technical Guidance Note (2019) prepared by Landscape Institute[4];
- Kingston Towards a Sense of Place. A Borough Character Study to support the Kingston Local Development Framework (Section 17, Old Malden) (2011);
- The Royal Borough of Kingston upon Thames Views Study Report (2018)[5];
- Draft Tall Building Strategy, Royal Borough of Kingston upon Thames (2023)[6]; and
- Merton Borough Character Study Supplementary Planning Document (2021)[7]

1 Ministry of Housing, Communities and Local Government (2024). Planning practice guidance. [online] GOV.UK. Available at: https://www.gov.uk/government/collections/planning-practice-guidance. (accessed 24 June 2025).
2 Landscape Institute and IEMA (2013). 'Guidelines for Landscape and Visual Impact Assessment'. Routledge.
3 Tudor, C. and England, N. (2014). An Approach to Landscape Character Assessment. [online] Available online: https://assets.publishing.service.gov.uk/media/5aabd31340f0b64ab4b7576e/landscape-character-assessment.pdf. (accessed 24 June 2025).
4 Landscape Institute (2019). Visual Representation of Development Proposals. Available at: https://www.landscapeinstitute.org/wp-content/uploads/2019/09/LI_TGN-06-19_Visual_Representation-1.pdf. (accessed 24 June 2025).
5 3.4.5. Kingston Towards a Sense of Place. A Borough Character Study to support the Kingston Local Development Framework (Section 17, Old Malden) (2011); . available at: https://www.kingston.gov.uk/sites/default/files/downloads/Borough_Character_Study___00_introduction.pdf (accessed 01 September 2025)
6 Draft Tall Building Strategy, Royal Borough of Kingston upon Thames (2023). Available at: https://www.kingstonletstalk.co.uk/planning/draft-tall-buildings-strategy/supporting_documents/Draft%20Tall%20Buildings%20Strategy%20FINAL.pdf (accessed 01 September 2025)
7 Merton Borough Character Study Supplementary Planning Document (2021). Available at: https://www.merton.gov.uk/planning-and-buildings/planning/supplementary-planning-documents/character-study2021 (accessed 19 September 2025)

EMERGING POLICY

DRAFT LOCAL PLAN (REGULATION 18)

3.5 RBKUT is preparing a new Local Plan which will replace the existing Core Strategy documents. The new document will set out the policies required to deliver the visions for the Royal Borough. The first draft was published and following a round of consultation, RBKUT is considering the responses and intends to undertake an additional consultation under Regulation 18 given the significant changes to the NPPF.

3.6 Given the early stages of the Local Plan review no weight has been afforded to the emerging plan in the assessment of the proposals.

3.7 The policy discussion below builds on RBKuT's Draft Tall Building Strategy, published in 2023.

POLICY DISCUSSION

HIGH DENSITY DEVELOPMENT

TALL BUILDINGS

3.8 Policy CS 8 Character, Design and Heritage of the 2012 RBKuT Core Strategy comprises a short paragraph on tall buildings:

> *"Tall buildings may be appropriate in the Borough's town centres; however, some parts of these areas will be inappropriate or too sensitive for such buildings. Relevant SPDs will provide further guidance on this matter and the Council will determine applications for such development on the basis of the criteria in the English Heritage/CABE Guidance on Tall Buildings (July 2007) and the London Plan."*

3.9 The Draft Tall Building Strategy refers to the Mayor of London's 'Characterisation and Growth Strategy' London Planning Guidance which defines tall buildings as buildings over 21 m, including rooftop equipment, plant and other service structures. The proposed development would qualify as tall buildings.

3.10 In the absence of an adopted tall buildings policy, Policy D9 of the London Plan provides the most current criteria to assess tall buildings in RBKuT.

3.11 Limb B of Policy D9 suggests that area assessments, which can comprise characterisation studies and conservation area appraisals, should be used to assess capacity for growth taking the above characteristics into account. RBKuT's Draft Tall Building Strategy undertakes an assessment of the sensitivities to tall buildings. It concludes that the Site falls in an area potentially more sensitive for tall buildings, due to the open land and MOL designation.

3.12 On that basis, the proposed development would not meet the policy requirement of Limb B of Policy D9 and Limb C needs to be considered. A High Court decision (R(LB Hillingdon) v MoL & Ors [2021EWHC 3387]) is clear that the locational part of the London Plan Policy D9 on tall buildings is not a gateway or precondition to compliance with the policy, which must be considered as a whole.

3.13 Limb C discusses the design aspects of a tall building proposal and its visual, functional, environmental and cumulative impacts. This TVA, based on a comprehensive view assessment, see **Section 6.0**, analyses the proposals in the round.

3.14 The role of design in land use optimisation is expressly treated at D3. This restates the established sustainability principle of making best use of land, but adds that this should be done through a consideration of options "*to determine the most appropriate form of development*". Throughout the pre-planning process, different typologies and massing arrangements of the buildings on the Site were explored, culminating in the proposed layout of the five blocks maximising the open space along Beverly Brook.

3.15 Part A contains the general requirement that a "*design-led approach requires consideration of options to determine the most appropriate form of development that responds to a site's context and capacity for growth*".

3.16 The other limbs of D3 comprise more familiar contextual and amenity related policies. The proposed development has evolved mindful in relation to the immediate context, particularly in relation to the open land to the east and west.

3.17 Policy D8 supports the creation of new public realm that is safe and appropriate and attractive, enhancing the way the wider area functions along with the site. The function and design of new public realm should contribute to local distinctiveness and be based on an awareness of it. The landscape strategy is a key component of the proposed development, creating a new neighbourhood that is fully embedded in the surrounding context and the open land.

VIEWS

3.18 The Site is not located in any viewing corridors identified by the London View Management Framework (2012), nor their Background Wider Consultation Area.

3.19 The Site falls within two of the 13 'Very highly important views, identified in the 2018 View Study Report (VHIV2 Hampton Court Palace 1st Floor Drawing Room, Long Water Vista (HLA 4D) and VHIV6 West side of Heron Pond in Bushy Park and looks east (HLA 145)). The study notes that these views *"are all considered to warrant the highest level of ranking to be adopted as part of the emerging Local Plan"* as they *"contribute most to the appreciation of the Borough's identity, to be taken forward to support the evidence base for the Local Plan".*

3.20 These views are discussed at **Sections 6.0 and 9.0**.

4.0
HISTORIC DEVELOPMENT
MOTSPUR PARK GAS HOLDERS

HISTORIC DEVELOPMENT

4.1 This section provides a description of the historic development of the Site and that of the surrounding area.

4.2 The section has been informed by secondary sources, including:

- Layers of London. Available at https://www.layersoflondon.org/ (accessed on 08 September 2025)
- A History of the County of Surrey: Volume 3 ed. H E Malden (London, 1911), British History Online. Available at https://www.british-history.ac.uk/vch/surrey/vol3/p481 [accessed 23 January 2025]
- Royal Borough of Kingston upon Thames, *Kingston Borough Character Study*, January 2011 (see above)

DEVELOPMENT OF MOTSPUR PARK AND SURROUNDING AREA

4.3 The Site sits directly within the eastern boundary of the Royal Borough of Kingston upon Thames which borders the London Borough of Merton. It is bounded to the west by the minor London watercourse of Beverley Brook.

4.4 The name of Motspur Park derives from the land's historic associations with the Mot family who owned a swathe of farmland in this area in the 14th century. This area remained in agricultural use, predominantly for market gardening, for centuries and is recorded as 'Motts Spur Farm' in an 1823 Gazetteer.

4.5 Map regression shows the area experienced little change between 1804 and 1871 as evidenced by **Figures 4.1, 4.2 and 4.3** below, where the character of the area remains as undeveloped agricultural fields. The principal change which occurred in the 19th century was the construction of the railway line and the construction of Morden Cemetery (then named Battersea New Cemetery in 1891) which is located to the east of the Site today.

Figure 4.1 Extract of Williams' 1804 Map of London Surrounds with indicative location of Site marked in red

Figure 4.3 Extract of 1898 OS Map with indicative location marked in red

Figure 4.2 Extract of 1871 OS Map with indicative location of Site marked in red

Figure 4.4 Extract of 1914 OS Map with indicative location of Site marked in red

RAILWAY PRESENCE

4.6 The first instance of the Site in its present day triangular configuration appearing on a map is in the 1871 OS map (**Figure 4.2**) which shows it as a wooded area surrounded by farmland, and divided from the farm complex of 'Mosper Farm' by the railway line.

4.7 The railway's earthworks were planned and dug (largely laying a slight embankment, assisting with bridges over roads) and then laid through the area in 1859 by the London and South Western Railway. A station at Motspur Park was not constructed until much later in 1925 to coincide with the electrification of the railway.

4.8 The line was serviced by Southern Rail and the newly constructed station was formed of an island platform with a small office and footbridge. Improvements were made to the station in the 1930s and its appearance is illustrated in the historic imagery below, see **Figures 4.5 to 4.7**.

Figure 4.5 Historic photograph of Motspur Park railway station looking towards the Site, c.1930s

Figure 4.6 Historic photograph of Motspur Park railway station looking towards the Site, c.1955 (Source: National Transport Library)

Figure 4.7 Aerial photo, May 1947, of railway line cutting through landscape and Site to the east (Source: RAF Aerial Photography)

GASHOLDER DEVELOPMENT

4.9 The gasholders were built in the early 20th century by the firm Clayton & Sons Ltd., a constituent company of Wandsworth Gas Company, in a triangular piece of land (the Site) following the line of the railway, prior to the station being opened. They stored gas to serve an area stretching to Kingston and Croydon.

4.10 Gasholder No. 1 was built in 1924 and is frame guided with an above ground tank, 22 standards and a nominal capacity of 615,000 cu ft.

4.11 Gasholder No. 2 was built a number of years later in 1932 and is frame guided with an above ground tank 24 lattice standards and a nominal capacity of 3,840,000 cu ft. The location of the gasholders can be seen on the 1933 OS Map at **Figure 4.8**.

4.12 The gasworks were nationalised in 1947 and Gasholder No. 3 was built in 1954. The three gasholders together can be seen in historic photographs from the 1950s (see **Figure 4.9**). The low topography of the surrounding area resulted in the gasholders being prominent features in the landscape (**Figures 4.10–12)**.

4.13 In the late 20th century, the gasworks was decommissioned and closed with the gasholders remaining redundant on the Site with only low level gas infrastructure in use at the site since that time.

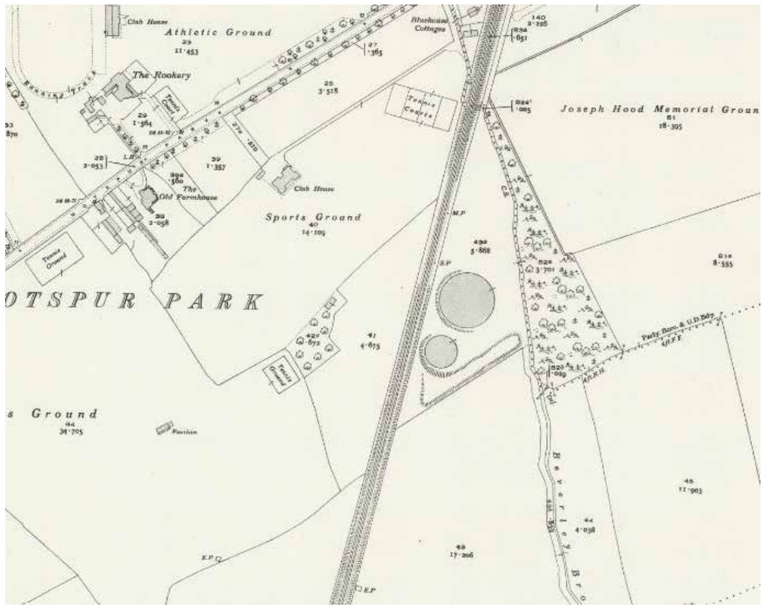


Figure 4.8 Extract of 1933 OS Map showing first two gasholders on site

Figure 4.10 Aerial Photo, July 1987 showing gasholders on present day site (Source: NCAP)

Figure 4.9 Gasholder No. 3 Historic Image of Inflated Gas Holders, c.1950s (Source: Merton Council Photo Library)

Figure 4.11 Photograph looking south towards the gas holders from Motspur Park Station, 2010

Figure 4.12 Photograph looking towards the gas holders from Motspur Park Station platform, 2024 (Source: Montagu Evans Site View)

SURROUNDING INTERWAR DEVELOPMENT

4.14 The area of Motspur Park experienced significant change in the interwar period with the construction of large swathes of suburban housing within planned developments, serving as commuter towns for London. These properties are predominantly semi-detached with large garden spaces to the rear. This development is characterised in RBKuT's Borough Character Study: Old Malden as:

> *Road layout is planned with predominantly curved street pattern. Significant pockets of distinctive housing, most notable at Meadow Hill and Barnfield; 1930's "Moderne", flat roofed, rendered, semi detached properties. Generally excellently preserved, some with original "crittal" windows. Glebe Gardens; well detailed group of semi detached properties with consistent Tudor details. Significant views to open space of Fulham Football Training Ground from Blakes Lane and Motspur Park.*

4.15 In 1931 Merton and Morden Urban District purchased part of a local farm in order to construct the open space of Sir Joseph Hood Memorial Playing Fields to provide amenity space for residents of new surrounding developments. The amenity space was named after the local benefactor and ex-Mayor of Wimbledon, Sir Joseph Hood (**Figure 4.13**). It provided football and cricket pitches, tennis courts, a bowling green and play areas. Today part of the Fields is managed as a local nature reserve.

Figure 4.13 Sir Joseph Hood Memorial Park

WORD WAR II

4.16 Motspur Park and the surrounding area was subject to bombing between October 1940 and June 1941. A large community bomb shelter was built in the Joseph Hood Playing Fields for local residents. The railway station was targeted by bombs in one instance, which destroyed houses in nearby Marina Avenue and Claremont Avenue. Houses along Motspur Park were also destroyed by bombing.

TODAY

4.17 Today the area of Motspur Park remains a residential area principally serving commuters who work in central London. The area is pleasant and verdant with large plots typically featuring semi-detached houses (**Figure 4.15**). The open space surrounding the Site is designated as MOL.

Figure 4.14 Morden and Sutton Joint Cemetery

Figure 4.15 Typical examples of suburban mid-century housing in the area

5.0
BASELINE: TOWNSCAPE
MOTSPUR PARK GAS HOLDERS

BASELINE: TOWNSCAPE

FUTURE BASELINE

5.1 This TVA assesses the proposed development against the existing scenario with the gasholders currently present on the site.

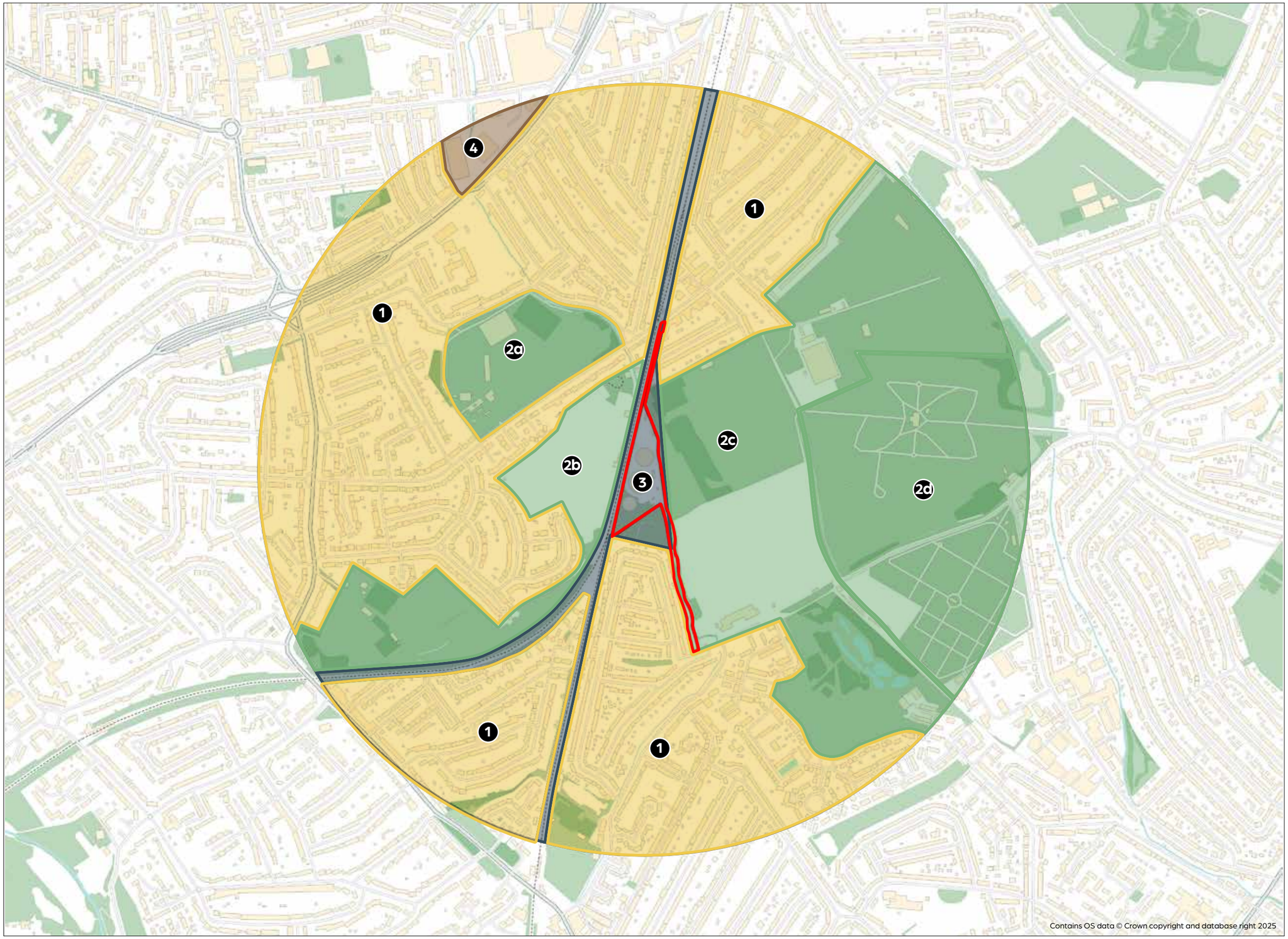
5.2 The findings of the assessment of an alternative future baseline in which the demolition and clearance of the site has already been undertaken is presented at **Appendix 4.0**.

TOWNSCAPE CHARACTER

5.3 The townscape surrounding the site may be categorised into four distinct areas. These broadly comprise housing, infrastructure, commercial development and green open spaces. For the purposes of this assessment the character areas are referred to as:

1. Interwar Residential Development
2. Green Spaces and sport facilities:
   2a. Green Spaces – Fulham Football Club Training Ground
   2b. Green Spaces – West of Train Line (site for approved expanded Fulham FC training ground)
   2c. Green Spaces – East of Train Line
   2d. Green Spaces – Cemetery
3. Infrastructure
4. Large Footprint Commercial/Industrial Use

5.4 The broad boundaries of the townscape character areas are identified in **Figure 5.1**. The character and appearance of the character areas is discussed below.



TOWNSCAPE CHARACTER AREA PLAN

- Application Site
- 1 Interwar Residential Development
- 2 Green Spaces
  - 2a. Green Spaces – Fulham Football Club Training Ground
  - 2b. Green Spaces – West of Train Line (site for approved expanded Fulham FC training ground)
  - 2c. Green Spaces – East of Train Line
  - 2d. Green Spaces – Cemetery
- 3 Infrastructure
- 4 Large Footprint Commercial / Industrial Use

LOCATION:
Motspur Park Gas Holders

DATE:
September 2025

SCALE:
1:10,000 @ A3

FIGURE 5.1 Townscape character area map

▲ **NORTH**

MONTAGU EVANS
CHARTERED SURVEYORS
70 ST MARY AXE,
LONDON, EC3A 8BE
T: +44 (0)20 7493 4002
WWW.MONTAGU-EVANS.CO.UK

CHARACTER AREA 1: INTERWAR HOUSING

5.5 Character area 1 is characterised by residential development which was developed on both sides of the railway from Waterloo to Dorking and Guildford from the 1930s onwards. There is a mix of short terraces and semi-detached houses with front and rear gardens. The buildings have predominantly two-storeys under a large hipped roof and are built in brick and rendered. Many of the houses have curved bow windows, gables and dormers, often decorated with mock-Tudor timber detailing. Despite later alterations, the built form of the buildings is maintained creating architectural continuity in the character area.

5.6 There are long straight residential streets such as Claremont Avenue, running north to south, and organically curving streets such as Bargate Close to the east and Kingshill Avenue to the south of the Site. The streets, generally of generous proportions, are subject to light traffic and generally have a calm residential character. Mature street trees and pockets of open space give the area a spacious feel.

5.7 The residential area is relatively contained through the orientation of streets and the regularity of development, and there is limited intervisibility with the existing Site.

5.8 The character area is predominantly experienced by local residents and pedestrians.

5.9 Associated viewpoints: 3, 4, 5, 7, 8, 9,10, 16, 23

5.10 Townscape value: **Low**

CHARACTER AREA 2: GREEN SPACE AND SPORTS FACILITIES

5.11 Character Area 2 comprises areas of open green space, including the land of the Fulham Football Club Training Ground to the west of the railway line (subarea 2a), the land to the west of the railway (2b) which has an extant planning permission for development to create an expanded Fulham FC training ground, the Sir Joseph Hood Memorial Playing Fields (2c) and Morden Cemetery (subarea 2d). All of the open space in the character contribute to the amenity of the area. TCA1 separates TCA2 into two halves. It abuts the Site and forms part of a larger mosaic of MOL, extending beyond the study area.

5.12 TCA2 has various uses and comprises a cemetery, sports fields, training facilities and open land for leisure activities.

5.13 Associated viewpoints: 1, 2, 6, 11, 13, 14, 17, 18, 19, 20, 21, 22

5.14 Townscape value: **Medium**

CHARACTER AREA 3: INFRASTRUCTURE

5.15 Townscape Character Area 3 comprises the railway corridor and adjoining land that run through the centre of the study area. The footbridge at Motspur Park station and the level crossing at West Barnes Lane are the only links across the tracks in the study area. The railway runs along the rear of the two storey properties in the built-up areas (TCA1) and through the open green spaces that make up TCA2. Here, the railway line is generally screened by planting.

5.16 The gasholders (now decommissioned) to the east of the railway fall into this TCA. The gasworks site itself comprises three redundant gasholders, ancillary buildings, associated service areas and access routes

5.17 Associated viewpoints: 5, 18, 19

5.18 Townscape value: **Low**

CHARACTER AREA 4: COMMERCIAL/INDUSTRIAL USE

5.19 There are low-rise industrial buildings at the northern border of the study area, separated from the residential areas by the A3, which has multiple lanes at this point. The buildings in TCA4 are commercial and industrial large-footprint sheds, clad in metal or brick with flat roofs or flat pitched roofs of no architectural merit. They are surrounded by tarmac areas, used for servicing, delivery and storage. Planting and vegetation are absent.

5.20 Given the spatial separation and the nature of the interposing development, which allow for minimal interaction with the proposed development, this TCA will not be assessed further.

5.21 Associated viewpoints: n/a

5.22 Townscape value: **Low**

TOWNSCAPE SUMMARY

5.23 **Table 5.1** presents a summary of the townscape receptor baseline information.

REF.	TOWNSCAPE CHARACTER AREA	TOWNSCAPE VALUE	FULL ASSESSMENT REQUIRED?
1	Interwar housing	Low	Yes
2	Green space and sports facilities	Medium	Yes
3	Infrastructure	Low	Yes
4	Commercial/Industrial Use	Low	No

Table 5.1 Summary of Townscape Receptor Baseline.

6.0
BASELINE: VISUAL
MOTSPUR PARK GAS HOLDERS

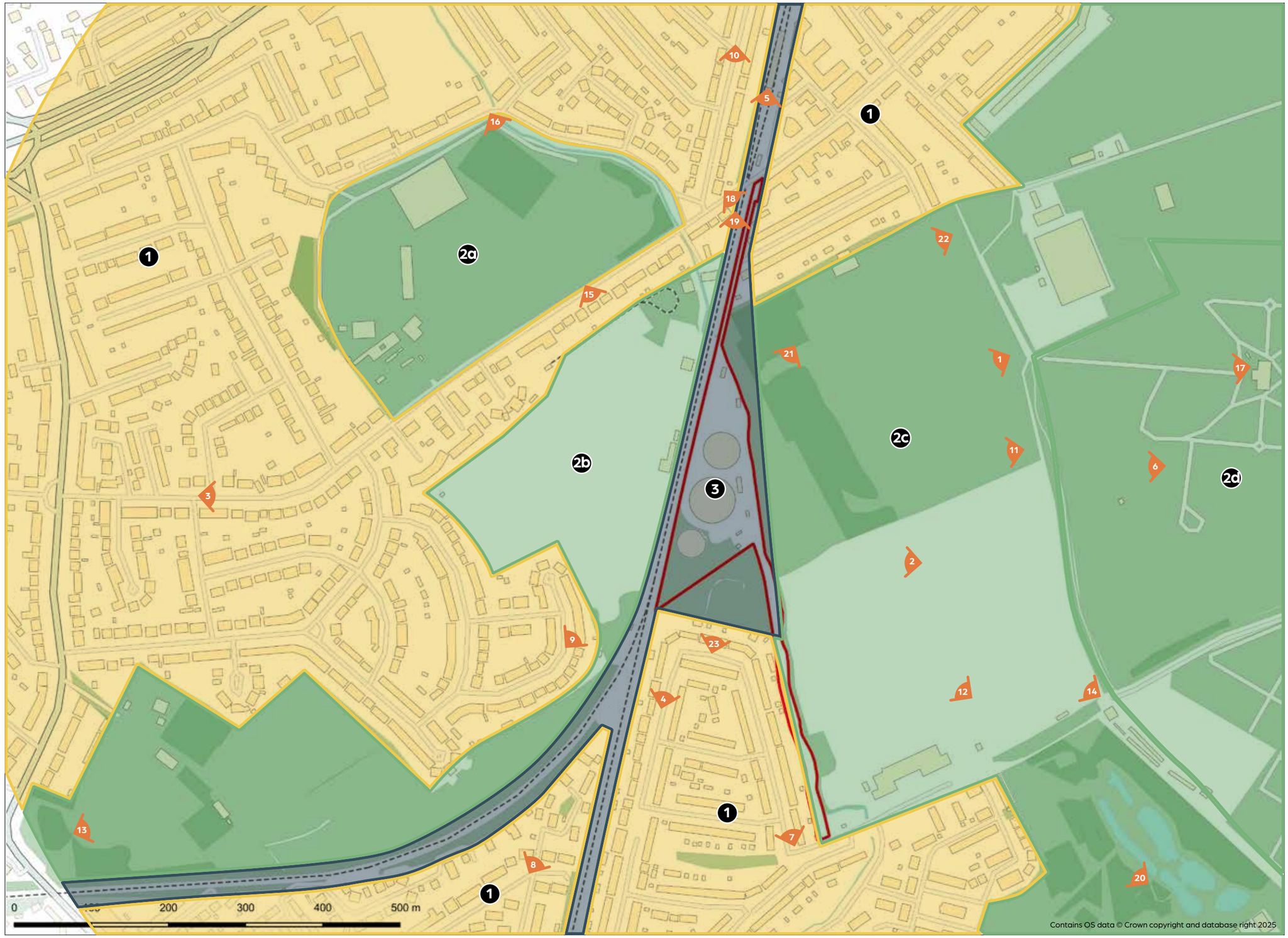
BASELINE: VISUAL

EXTENT OF VISIBILITY

6.1 A ZTV has been produced to outline the potential areas where the proposed development may be visible, covering an area of 2 km2 with the site at the centre. The ZTV has been produced using topographically referenced three-dimensional models from VuCity software. It is a tool for a high-level understanding of the extent of visibility, which was further interrogated through review of individual viewpoints using field surveys and digital software.

6.2 The ZTV illustrates that visibility of the proposed development is high from the surrounding open land and along the railway corridor, similar to the intervisibility with the gasholders currently occupying the Site.

6.3 Trees and planting in the open green spaces in the green spaces further away, which are not taken into account by the ZTV, would filter the views of the proposed development.



VIEW LOCATION PLAN LOCAL VIEWS WITH TOWNSCAPE CHARACTER AREAS

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. No. 124 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

Townscape Character Areas

1. Interwar Residential Development
2. Green Spaces
   - 2a. Green Spaces – Fulham Football Club Training Ground
   - 2b. Green Spaces – West of Train Line (site for approved expanded Fulham FC training ground)
   - 2c. Green Spaces – East of Train Line
   - 2d. Green Spaces – Cemetery
3. Infrastructure

LOCATION:
Motspur Park Gas Holders

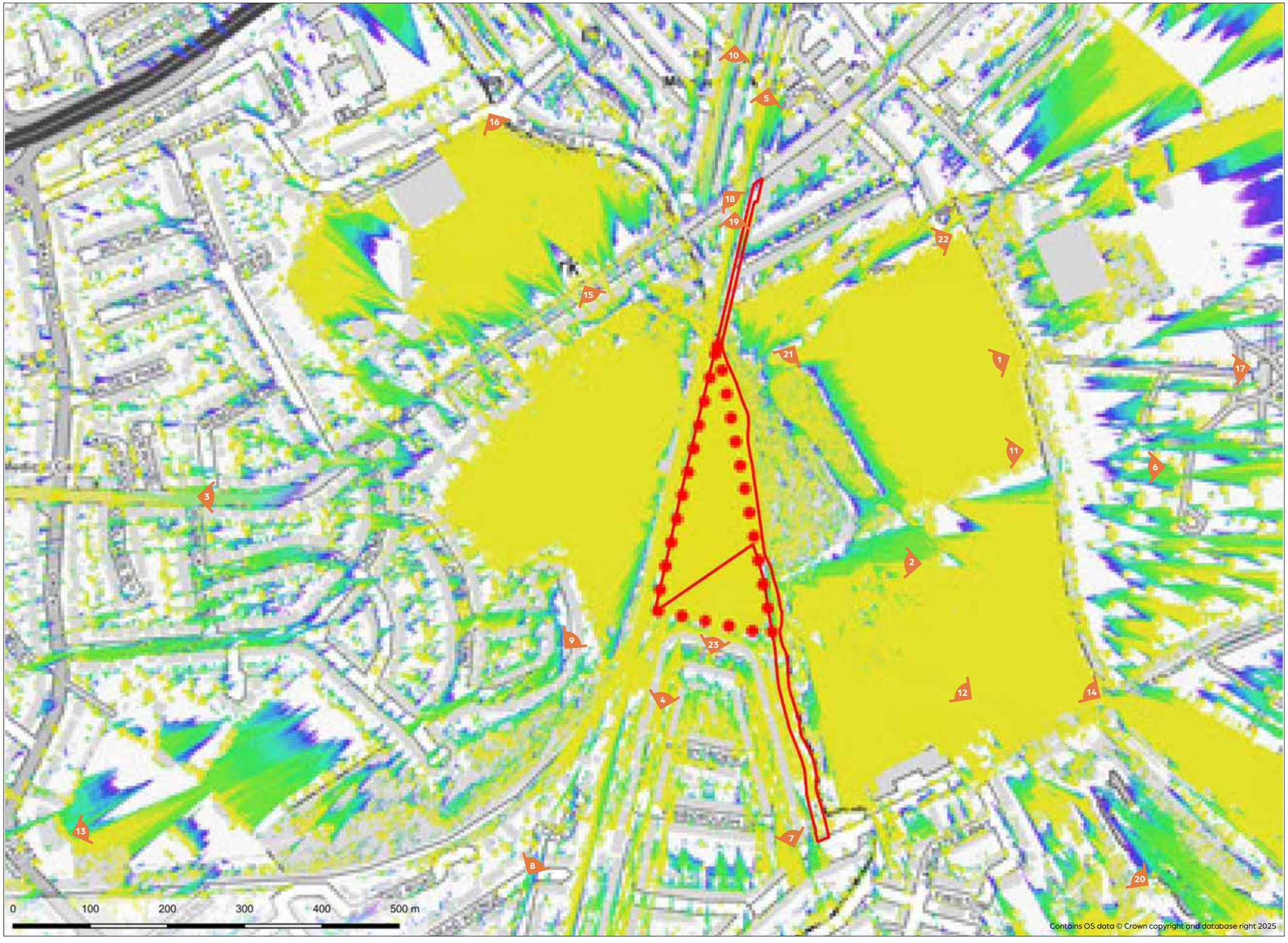
DATE:
September 2025

SCALE:
1:5,000 @ A3

FIGURE 6.1 View Location Plan with overlay of Townscape Character Area Plan

▲ **NORTH**

MONTAGU EVANS
CHARTERED SURVEYORS
70 ST MARY AXE,
LONDON, EC3A 8BE
T: +44 (0)20 7493 4002
WWW.MONTAGU-EVANS.CO.UK



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. No. 124 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

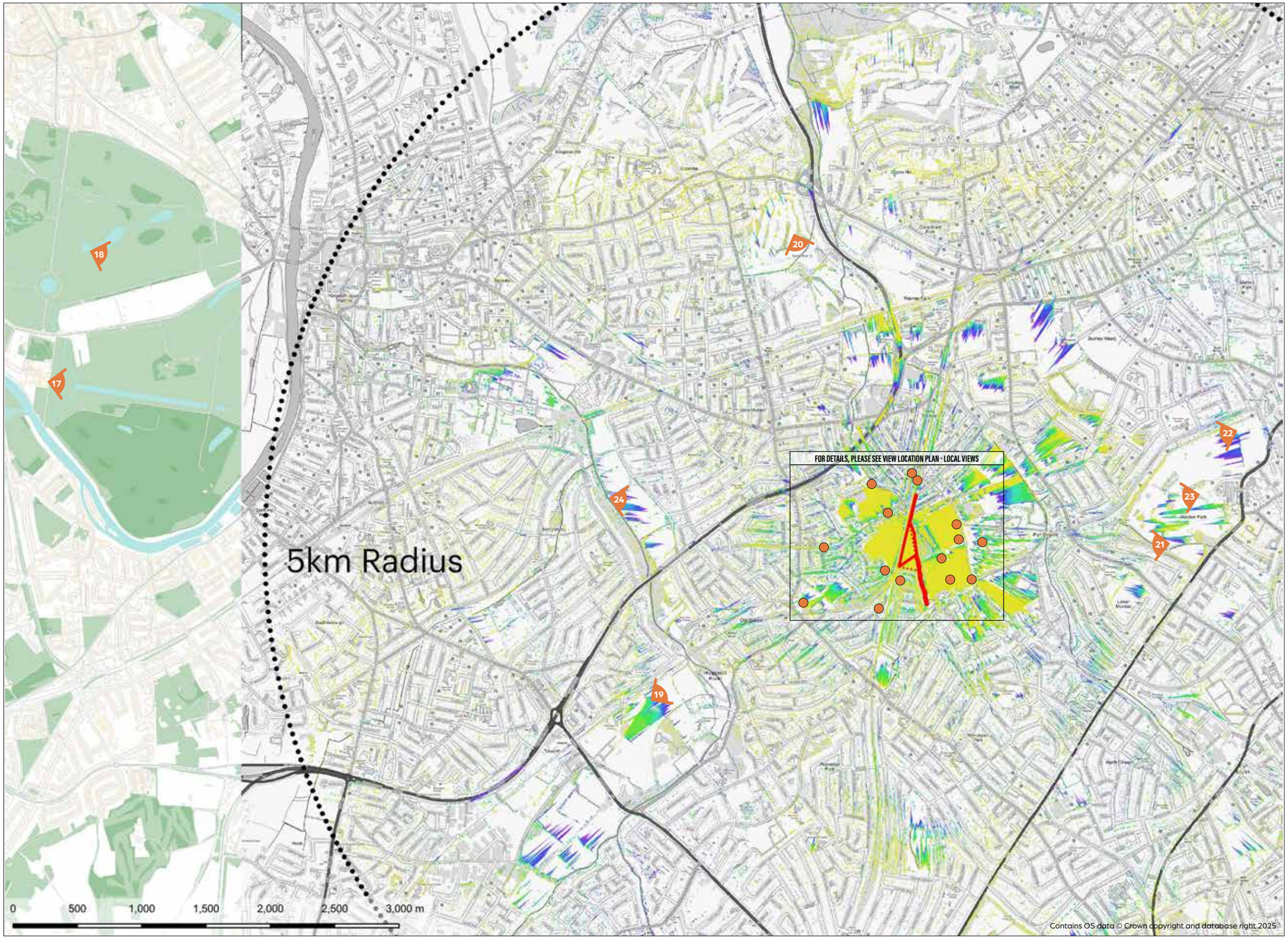
DATE:
September 2025

SCALE:
1:5,000 @ A3

FIGURE 6.2A View Location Plan with overlay of the ZTV (Local Area)

▲ **NORTH**

MONTAGU EVANS
CHARTERED SURVEYORS
70 ST MARY AXE,
LONDON, EC3A 8BE
T: +44 (0)20 7493 4002
WWW.MONTAGU-EVANS.CO.UK



VIEW LOCATION PLAN DISTANT VIEWS ZTV OVERLAY

Application Site

17. VHIV2 Hampton Court Palace 1st Floor Drawing Room, Long Water Vista (HLA 4D)
18. VHIV6 West side of Heron Pond in Bushy Park and looks east (HLA 145)
19. Worcester Park, near Sunray Estate community centre
20. Coombe Brook
21. Morden Park, west lawn near cricket ground
22. Morden Park, east lawn/near old tennis court
23. Modern Park, near Morden Park House
24. Hogsmill River

LOCATION:
Motspur Park Gas Holders

DATE:
September 2025

SCALE:
1:5,000 @ A3

FIGURE 6.2B View Location Plan with overlay of the ZTV (Distant Views)

▲ **NORTH**

MONTAGU EVANS
CHARTERED SURVEYORS
70 ST MARY AXE,
LONDON, EC3A 8BE
T: +44 (0)20 7493 4002
WWW.MONTAGU-EVANS.CO.UK

FUTURE BASELINE

6.4 This TVA assesses the proposed development against the existing scenario with the gasholders currently present on the site.

6.5 The findings of the assessment of an alternative future baseline in which the demolition and clearance of the site has already been undertaken is presented at **Appendix 4.0**.

VISUAL RECEPTORS

6.6 The text below sets out the different groups of people who may experience views of the proposed development, the places where they will be affected and the nature of the views and visual amenity at those points.

6.7 The View Location Plan is overlaid with the Townscape Area Plan at **Figure 6.1** to identify different character areas.

6.8 The location of the representative views has been informed by the previous assessments and the preparation of the ZTV. The ZTV and the view locations and the Townscape Character Area plan are overlaid at **Figure 6.2**. The baseline condition for each AVR is provided at **Appendix 1.0**, for each non-verified view at **Appendix 3.0.**

6.9 The views are representative of the experience of visual receptors within an area. The rationale for the selection of each view is provided at **Table 6.1**.

USERS OF SIR JOSEPH HOOD MEMORIAL PLAYING FIELDS

6.10 **This receptor group comprises the users of the open green spaces to the east of the site.** Receptors are likely to be using the space for amenity, sports, walking and enjoyment, with their focus being on the green and open space, in an environment characterised by housing developments.

6.11 The Sir Joseph Hood Memorial Playing Fields are part of the swathe of open spaces that characterise this part of the Royal Borough, including parkland and Morden Cemetery to the east.

6.12 Mature trees and dense planting can be found along the western boundary of the playing fields and the railway line, where the gasholders are located. Currently, the gasholders are a key feature in the views across the open space.

6.13 The receptor's attention will likely be focussed on their respective activities within the open space. Nevertheless, they will have an awareness of the surrounding urban townscape. This will remain as a peripheral, background feature to the activities of visual receptors within this group.

6.14 Views 1, 2, 11, 12, 14, 21 and 22 illustrate the visual amenity of this receptor group.

6.15 Visual amenity value: **Medium**

USERS OF MOTSPUR PARK SPORTS GROUND

6.16 **This receptor group comprises the users of the open green space to the west of the site, formally owned by the BBC and now by Fulham FC. The area has an extant planning permission for development to create an expanded training ground.**

6.17 Receptors are likely to be using the space for sports and leisure activities, with their focus being on the open space, in an environment characterised by urban development. Nevertheless, they will have an awareness of the surrounding urban townscape. This will remain as a peripheral, background feature to the activities of visual receptors within this group.

6.18 Apart from the surrounding housing, receptors will notice the railway line separating the open space from the site. Shrubs and several sheds are located along the embankment. Currently, the gasholders are a key feature in the views across the open space.

6.19 The area is privately owned and not accessible to the public.

6.20 Views: due to the private nature of the land, it is not possible to create AVRs.

6.21 Visual amenity value: **Low**

AMENITY USERS OF OTHER OPEN GREEN SPACES

6.22 This receptor group encompasses a wide range of people who would be using the open green areas around Motspur Park, benefitting from the amenity space for sports and other leisure activities in an otherwise suburban environment. While mature trees mark the boundaries and sub areas of these spaces, views are gained above and between trees of predominantly residential developments beyond the open spaces. The existing gasholders at Motspur Park and various pylons and overhead lines feature in the views across the predominantly residential character of the study area.

6.23 This receptor group comprises the visitors of Modern Cemetery. The cemetery is located between to the east of the Sir Joseph Hood Memorial Playing Fields. Trees along the path along the playing fields separate the cemetery from the open space. The cemetery comprises different types of memorials and the North East Surrey Crematorium, located at the centre on the main east-west avenue, which leads to the main entrance on Lower Morden Lane. Access is limited to regulated opening hours.

6.24 To the south is the Merton and Sutton Joint Cemetery, separated by a tree lined narrow path, and the Mayflower Park Wetlands. To the north are more playing fields. The trees and planting in the various green spaces form the contribute to the experience of this receptor group, providing it with a green.

6.25 The receptor's attention will likely be focussed on their respective activities within the open space. Receptors, however, will also have an awareness of the development beyond the open spaces. Receptors would include mourners, mostly local people, who travel to the site for remembrance and to look after the memorials.

6.26 Generally, receptors would appreciate the openness of the space and the long views afforded to across the lawns and playing fields towards the gasholders.

6.27 Views 6, 13, 17, 20, 26, 27, 28 and 29 illustrate the visual amenity of this receptor group.

6.28 Visual amenity value: **Medium**

COMMUTERS

6.29 Receptors in this group are likely to be the commuters, using Motspur Park Station on their way between their homes and job opportunities located in Central London. Receptors are likely to be traveling towards or away from their place of work. As such, receptors will be primarily focused on their route to the station, pedestrian activity associated with the road, including movement, the pedestrian bridge across the tracks, cars, traffic and associated noise and pollution. The gasholders at Motspur Park are a key feature in the views southwards from the bridge across the railway tracks at Motspur Park station.

6.30 As this group of receptors travel through the area, most will be aware of the urbanised character of the area.

6.31 Views 5, 18 and 19 illustrate the visual amenity of this receptor group.

6.32 Visual amenity value: **Low**

RESIDENTS IN VICINITY OF THE SITE

6.33 The residents, occupying the properties around the site, are the receptors in this group.

6.34 Enclosed by the railway line to the west, allotment gardens to the north and Beverley Brook to the east, the only vehicular access to the area to the south of the site is from Malden Road. The buildings in this area are predominantly semi-detached houses and short terraces, generally of two storeys. Large rear gardens and planting in the front gardens, combined with the wide roads, create a low density residential character. The large volumes of the gasholders, while visually permeable, are striking features, industrial in nature and different in character, are highly visible above the surrounding, residential streets.

6.35 Kingshill Avenue is the main street in this development, offering views towards the gasholders. From its northern section, there is access to the allotment gardens which separate the houses from the gasholders.

6.36 Views 4, 7, 8 and 23 illustrate the visual amenity of receptors to the south of the site.

6.37 The residents to the west of the railway line form the receptors in this group. They occupy the houses on the south side of Motspur Park, the road running westwards from the bridge over the Beverley Brook near the level crossing with the railway line. These houses back onto the open green space of Motspur Park, opposite the gasholder site. The gasholders are a key feature in the views from Motspur Park. Beyond Blake Avenue, there are further residential streets. They are gently curving, for example Bargate Close, reminiscent of the Garden City movement at the beginning of the 20th century. Wide streets, trees in the front gardens and grassed area characterise the low-density residential character.

6.38 Views 3, 9, 13, 15a and 15b illustrate the visual amenity of receptors to the west of the site.

6.39 This visual receptor group comprises the residents occupying the properties to the north of the Site, primarily those on Claremont Avenue and the streets running parallel, such as Belmont Avenue, Cavendish Avenue and Seaforth Avenue. They are all pointing towards the site, and from where views of the proposed development would be obtained. Looking northwards, receptors see the 265 Burlington Road scheme on the Tesco car park next to Burlington Road, comprising building of 6 to 10 storeys. Receptors will be aware of the twelve storey block of One New Malden at Blagdon Road.

6.40 The experience of receptors within this group is defined by the residential character of the visual amenity area. The area comprises terraces and semi-detached houses of two storeys with pitched roofs. Bow windows and dormers provide some articulation and visual interest.

6.41 Continuous street frontages and on-street parking frame the wide roads, which, despite the large rear gardens and the low-density quality of the area, are urban in appearance.

6.42 The railway line and the level crossing at West Barnes Lane, south of Motspur Park station, form part of the visual amenity of the area.

6.43 Views 10 and 16 illustrate the visual amenity of amenity of receptors to the north of the site.

6.44 Visual amenity value: **Low**

STATIC VIEWS

6.45 The following two views are identified in the Kingston View Study Report as Very Highly Important Views. They form part of the evidence base for the emerging local plan.

VIEW 24: VHIV2 HAMPTON COURT PALACE 1ST FLOOR DRAWING ROOM, LONG WATER VISTA (HLA 4D)

6.46 The view from Hampton Court is one of the 'Static vistas and channelled views'. The Views Study describes the view as follows:

"The view is from the 1st floor of the palace in the Drawing Room. The view looks east across the gardens towards Home Park. The Yew Trees are prominent in the view along with the oval fountain pond. The avenue aligns with the 17th century Long Water and 18th century Lime Avenues in Home Park with views beyond to the wooded backdrop of the River Thames and beyond to the built up edge of Kingston. As with 4A, the importance of the view is the elevated prospect which is obtained from within the Palace which provides a wider appreciation of the setting of the Palace Grounds. This is a key prospect defined in the Hampton Court Management Plan."

6.47 Visual amenity value: **High**

VIEW 25: VHIV6 WEST SIDE OF HERON POND IN BUSHY PARK AND LOOKS EAST (HLA 145)

6.48 The view from Heron Pond is one of the 'Wide panoramas where the view is a whole experience in a wider setting'. The Views Study describes the view as follows:

"The View is from the Grade I Registered Park and Garden and Royal Park, which is also a SSSI, and the viewing location acknowledges its historic associations. When Henry VIII took over Hampton Court Palace from Cardinal Thomas Wolsey in 1529, the King also took over the three parks that make up modern-day Bushy Park: Hare Warren, Middle Park and Bushy Park. A keen hunter, he established them as deer-hunting grounds. The View looks across to Kingston Old Town Conservation Area and the Church of St Johns (Grade II Listed) and the layered backdrop of the Kingston Town skyline. This view provides a longer distance vantage point to the connecting Kingston Bridge and the varied building typologies and heights at the gateway to the town and along the riverscape. "

6.49 Visual amenity value: **High**

SECTION SUMMARY

6.50 **Table 6.1** below provides an overview of the visual receptor considerations, including any additional considerations such as the proximity to key transport nodes.

REF	VISUAL RECEPTOR	REPRESENTATIVE VIEWS	VISUAL AMENITY VALUE
Receptor group			
1	Users of Sir Joseph Hood Memorial Playing Fields	Views 1, 2, 11, 12, 14, 21 and 22	Medium
2	Users of Motspur Park sports ground	n/a	Low
3	Amenity users of other open green spaces	Views 13, 20, 26, 27, 28 and 296 and 17	Medium
4	Commuters	Views 5 and 18	Low
5	Residents in vicinity of the Site	Views 4, 7 and 23, 24 Views 3, 9, 13, 15a and 15b Views 10 and 16	Low
Static views			
6	VHIV2 Hampton Court Palace 1st Floor Drawing Room, Long Water Vista (HLA 4D)	View 24	High
7	VHIV6 West side of Heron Pond in Bushy Park and looks east (HLA 145)	View 25	High

Table 6.1 Summary of Visual Receptor Baseline.

7.0
CONSULTATION AND MITIGATION BY DESIGN
MOTSPUR PARK GAS HOLDERS

CONSULTATION AND MITIGATION BY DESIGN

7.1 A full consultation analysis is provided in the Design and Access Statement prepared by the architects, Maccreanor Lavington and the Statement of Community Involvement prepared by Cavendish.

7.2 The TVA has been prepared in accordance with the Scoping Report and Scoping Opinion as amended through the further consultations. It has also had regard to the EIA Consultee Responses relevant to the assessment.

7.3 A comprehensive programme of pre-application discussions with the Council and key stakeholders has been undertaken since the inception of the scheme. The design has undergone iterative development informed by the pre-application process and engagement with stakeholders, including the Greater London Authority and the Design Review Panel.

7.4 Mitigation by design has followed the key criteria for achieving a well-designed place, as set out in the National Design Guide (the 'NDG').

CONTEXT

7.5 The site is located adjacent to the railway line from London Waterloo to Dorking and Guildford, approximately halfway between Motspur Park station and Worcester Park station. The site is currently occupied by three large-scale gasholders and other gas related infrastructure.

7.6 To the east, the site is bordered by thick vegetation, including mature trees, and Beverley Brook, which separates it from the Sir Joseph Hood Memorial Playing Fields and the cemeteries further east. To the north and south is suburban, residential development.

IDENTITY

7.7 The site forms an island, separated by the railway and Beverley Brook from the surrounding open green space and low-density Interwar housing. The proposed buildings would form set pieces that would raise the architectural bar, to be appreciated from the surrounding townscape and open spaces.

7.8 The proposed five buildings would form a family. Each building would have its own identity and individual expression, while adhering to a collective design approach. Unique, distinct and recognisable architectural devices and a shared colour and material palette would achieve a clear language across all five buildings. The buildings would have a clearly articulated plinth, middle and top and respond to their specific position on the site. Gables overlooking the entrance spaces would be treated differently.

BUILT FORM

7.9 The proposed development would achieve an attractive roofline, comprising a row of four buildings (A, B, C and D) along the railway corridor to the west of 12 to 16 storeys. The cruciform plan would produce a varied and stepped roof line. Building E next to Beverley Brook would have eight storeys, achieving a balanced transition from the site to the open space to the east. The proposed layout would allow for an optimal protection from noise from the train line, while creating a maximum of green space between the buildings.

7.10 The proposed site plan has evolved with advice from the consultant team, including a landscape specialist, to reduce the impact of the proposals on openness. The gaps between the buildings are such that they offer generous views out across the adjacent green spaces.

7.11 A cohesive and high-quality material palette is applied throughout the scheme to ensure visual continuity and richness in texture, which would relate to the local context. Various buff brick colours and metal work detailing to key elevations would create a cohesive appearance.

PUBLIC SPACES AND LANDSCAPE DESIGN

7.12 Garden spaces between the buildings, such as the Woodland Garden and the Central Green, play space arrangements, in combination with habitat enhancements, shrub planting and additional trees, along Beverly Brook, would create a new pedestrian experience along the route from West Barnes Lane to the north and Green Lane to the south, allowing both residents of the proposed development and those living on the adjoining streets to enjoy the benefits that the site offers.

7.13 The site's industrial legacy would be reflected in the proposed landscape design. Pathways and planting would mirror the alignment and circular shape of the historic gasholders.

USES

7.14 The proposed development would introduce efficient, well-performing buildings, offering high-quality residential accommodation near a train station. The Site would be suitable for a building of this size and the use proposed. This type of use would enhance the attractiveness of the area in terms of activating the access routes from West Barnes Lane and Green Lane, contributing to the local economy.

CONSULTATION COMMENTS

7.15 **Table 7.1** summarises the consultation comments received from stakeholders through the Scoping Opinion process in respect of the townscape and visual assessment and the responses to demonstrate where the comments have been addressed within the assessment. Officers at RBKuT and LBM and at the GLA informed the proposed design throughout the pre-application process.

CONSULTEE AND FORM/ DATE OF CONSULTATION	SUMMARY OF KEY POINTS / CONSIDERATIONS	WHERE IN THIS VOLUME COMMENTS ARE ADDRESSED
Kingston Council		
Pre App 1: 14th February 2025	Officer support for residential development of PDL in the MOL, for the Site to be developed comprehensively and general support of design and approaches Request for optimisation of building layout to enable better visual links and optimise use of public space Support for activation of the Site's eastern edge including landscaping and planting along Beverley Brook Connectivity through the Site is welcome – proposed linkages and pedestrian routes and cycle routes	Townscape and visual impact assessment (Sections 8.0 and 9.0)
Pre App 2: 5th March 2025	This site is not without a number of significant constraints but, if development is considered acceptable on this site, it has a wonderful USP surrounding it, its landscape, and it is this that should really drive the siting, form and function. This site may create a new identity rather than scale up the character of the existing context but it must be well designed and use the right mix of building types, forms and scale of buildings and public spaces for the context and the proposed density, to create a coherent form of development that people will enjoy.	Townscape and visual impact assessment (Sections 8.0 and 9.0)
Pre App 3: 25th March 2025	Composition and building heights Reduction of visual impact and openness of surrounding green space Improvement of access routes from north and south	Townscape and visual impact assessment (Sections 8.0 and 9.0)
Pre App 4: 11th June 2025	Reduced footprints, increased landscape, further public access and improvements to dual aspects numbers all positive Encourage team to look at further access routes Architectural language supported	Townscape and visual impact assessment (Sections 8.0 and 9.0)
Pre App 5: 17th July 2025	Greater distinction between buildings encouraged through materiality, colour and signage to assist with legibility and navigation Mix of light and dark will be important and impact the character of the buildings Unclear arrival route at present which needs to be developed	Townscape and visual impact assessment (Sections 8.0 and 9.0)
Merton Council		
Pre App 1: 27th February 2025	Support for main housing proposal Discussion on pedestrian / cycle routes	Townscape and visual impact assessment (Sections 8.0 and 9.0)
Greater London Authority 'GLA'		
Pre App 1: 1st April 2025 Pre App 2: 21st August 2025	Comprehensive redevelopment of PDL site in the MOL considered 'not inappropriate' Support of design led approach to optimisation and scale and form of the development emerging Provision of enhanced green infrastructure and publicly accessible open space are key deliverables for this MOL site	Townscape and visual impact assessment (Sections 8.0 and 9.0) Townscape and visual impact assessment (Sections 8.0 and 9.0)
Kingston Design Review Panel (Design South East)		
DRP: 16th April 2025	Test alternative massing options which reduce the bulk of – and increase the size of the gaps between – the building elements which are visible above the tree line. Develop a clear vision and unique identity for the development, informed by the site context and site character analysis. Develop alternative housing typologies which reduce the number of single aspect homes, prioritising sustainability and quality of life for future residents Reduce the building footprint to free up additional ground plane for high quality public realm and landscape design, and increase the provision of on-site play Develop a bespoke architectural character which responds more directly to the unique location of the site and the emerging vision for this development.	Townscape and visual impact assessment (Sections 8.0 and 9.0)
DRP: 6th August 2025	Pavilion block concept has been strengthened Significant improvements have occurred to the layout, form and massing Celebration of heritage through the re-use of post-industrial materials which strengthens the contextual landscape response Some aspects of architectural expression, access strategy and aspects of the public realm to be reviewed further	Townscape and visual impact assessment (Sections 8.0 and 9.0)

Table 7.1 Summary of Consultation

8.0
ASSESSMENT OF EFFECTS: TOWNSCAPE
MOTSPUR PARK GAS HOLDERS

ASSESSMENT OF EFFECTS: TOWNSCAPE

8.1 This section assesses the effect of the proposed development on the townscape character areas identified in **Table 5.1**.

8.2 A qualitative assessment is provided below. A summary of the effects arising from impacts to townscape receptors is provided at **Table 8.1.**

DEMOLITION AND CONSTRUCTION STAGE

8.3 ES Volume 1, Chapter 5 sets out the anticipated programme of works and key activities undertaken on site necessary to facilitate the proposed development.

8.4 The construction stage would directly affect Townscape Character Area 3: Infrastructure, the character area in which the Site falls and Townscape Character Area 1: Interwar Housing, where the access routes are located. Townscape Character Area 2: Green space lies adjacent to the Site and is affected to a lesser extent. Townscape Character Area 4: Commercial/ Industrial Use would not be affected at all. The townscape value of the TCAs are, with the exception of TCA2, Low. TCA2 has a townscape value of **Medium**.

8.5 The activities linked to construction on the Site would be screened by hoarding which would mitigate the impact on the experience and visual amenity of the streets surrounding the Site for pedestrians and road users. It is not considered that taller construction equipment would change the context in which the townscape is experienced materially. The appearance of cranes, for example, associated with the development of nearby sites is not considered to change the value of the townscape. Other effects would include construction traffic, and noise, dust and vibration associated with the works on site to deliver the proposed development. These activities would be temporary and of short-term duration.

8.6 The susceptibility of the townscape receptors is judged to be **Medium**, apart from TCA3 which has a Low susceptibility. Using professional judgement, TVA1 and TCA2 are identified as having a **Medium** sensitivity and TCA3 **Low**.

8.7 The impact would be most experienced within close proximity to the Site, in particular along the access routes from West Barnes Lane and Green Lane. This would have an adverse impact to the character, function and appearance of the adjoining parts of TCA1. Given that the demolition and construction works are focused on the Site in TCA3, which is largely separated by vegetation from TCA1, and that the TCA1 covers a large area, the majority of TCA1 would remain unaffected by the construction phase of the proposed development. As a result, the magnitude of impact on TCA1 would be **Low**. The likely construction effects would accordingly be **Minor Adverse** as they are temporary and short to medium term, and local in nature. This effect would not be significant.

8.8 Due to its current nature as a piece of transport and energy infrastructure, the magnitude of impact on TCA3, in which the Site falls, is **Low**. The likely construction effects would accordingly be **Minor Adverse.** They would be temporary and short to medium term, and local in nature. This effect would not be significant.

8.9 For the TCA2, the likely effects at the construction stage of the proposed development would be largely limited to the visibility of cranes. Therefore, the magnitude of impact would be **Very Low**. The likely construction effects would accordingly be **Negligible Adverse.** They would be temporary and short to medium term, and local in nature. This effect would not be significant.

COMPLETED DEVELOPMENT STAGE

TOWNSCAPE CHARACTER AREA 1: INTERWAR HOUSING

8.10 Townscape Character Area 1: Interwar housing comprises two-storey semi-detached houses and short terraces built along organically curving streets across large parts of the study area. The buildings are similar in material and style, which gives TCA1 a homogenous appearance. Large rear gardens and street planting create a tranquil, residential character. Currently the gasholders, now decommissioned, are visible in the views towards the Site. Overall, the receptor has a low ability to accommodate the type of change proposed without change to its value. The susceptibility of the receptor to the type of change is **Medium**. When calibrated with the **Low** value, the sensitivity of the receptor is **Medium**.

8.11 Although screened by interposing buildings, trees and vegetation, the proposed development could be glimpsed above the established roofline in the views from within the TCA, particularly from the sections of Kingsland Avenue, that point towards the Site or from Mayfair Avenue and Bargate Close further west or Claremont Avenue, located to the north. From the view locations, as demonstrated by Views 4, 9 and 10, the stepped composition of the proposed development would provide an attractive backdrop to the view. Across the separating distance, the high-quality elevational treatment would be noticeable, replacing the gasholders and their industrial aesthetics which appear alien in the residential context of Motspur Park.

8.12 Furthermore, following the removal of the gasholders, the proposed development would make Beverley Brook accessible to the public and introduce a central green space, offering mixed-use activities for all. Currently, the gasholder site is not accessible to the public. The landscape design would reflect the footprints of the former gasholders and the history of the Site. Benches and seating arrangements would invite people to linger and enjoy the flora and fauna that the site offers.

8.13 Notwithstanding potential visibility, the proposed development would not impact upon one's experience of the townscape character area.

8.14 Overall, taking into account the size of TCA1, the proposed development would have a **Low** magnitude of impact on TCA1. It would replace the existing condition with a new high quality development. The proposals would mark a demonstrable improvement to the character, appearance and function to the area due to the new route along Beverley Brook connecting the different pockets of TCA1. The resultant likely effect would be **Minor Beneficial** and direct, permanent and long-term**.** This effect would be not significant.

TOWNSCAPE CHARACTER AREA 2: GREEN SPACES AND SPORTS FACILITIES

8.15 Townscape Character Area 2: Green spaces and sports facilities covers a large part of the study area. It comprises various pieces of parkland, sports fields and the cemeteries to the east of the site; some of the areas are designated as MOL. Originally part of one large swathe of open land, TCA3 was carved up during the 20th century when the area was developed for housing. Currently the gasholders, now decommissioned, are visible in the views towards the Site. The receptor has a medium ability to accommodate the type of change proposed without change to its value. The susceptibility

of the receptor to the type of change is **Medium**. When calibrated with the **Medium** value, the sensitivity of the receptor is **Medium**.

8.16 In the views from the east (TCA2c and TCA2d), the proposed development would be seen behind the area of woodland along Beverly Brook, which would soften the potential impacts. The upper parts of the buildings would be visible; they are lower than the existing gasholders, however. Gaps between the buildings would allow visual connections through to Motspur Park to the west of the railway line. From the west (TCA2b), the railway line introduces a visual separation that would limit the impact of the proposed development. The proposed development would be screened to a large extent by the trees along the railway embankment.

8.17 Compared to the industrial nature of the gasholders, the proposed development would sit comfortably in the surrounding context of Motspur Park the housing of TCA2. The residential character would be readily understood due to the balconies and the elevational treatment.

8.18 The proposed landscape strategy would integrate the Site into the existing network of open green spaces. Beverley Brook would be made accessible, allowing the amenity users of TCA2 to enjoy the enhanced habitat on the Site.

8.19 Notwithstanding potential visibility, the proposed development would not impact upon one's experience of the townscape character area.

8.20 As TCA2 comprises various pieces of open green space, the proposed development would have a **Medium** magnitude of impact on TCA2 overall. It would remove the existing condition and replace the redundant gasholders with a new high quality residential development that is more aligned with the uses in the study area. The proposed development would transform the land along the Beverley Brook, integrating it with TCA2. The resultant likely effect would be **Moderate Beneficial** and direct, permanent and long-term**.** This effect would be significant.

TOWNSCAPE CHARACTER AREA 3: INFRASTRUCTURE

8.21 Townscape Character Area 3: Infrastructure comprises the railway corridor and the Motspur Park gasholder site which is now redundant. The site occupies a large part of the character area. Currently, there are three gas holders on the Site. There is also a single storey ancillary building and large tarmac areas. All these structures are to be removed in due course. Considering the condition of the area and the planned demolition of the gasholders, the susceptibility of the TCA to the proposed development is judged to be **Low**. As the townscape value is **Low**, its sensitivity is judged to be **Low**.

8.22 The proposed development would transform the site, introducing five residential buildings and ample public green space along Beverly Brook. Stepping up from eight to 16 storeys, the proposed development would achieve a balanced and visually interesting composition that sits comfortably within the wider context. At the proposed height, the buildings would be lower than the current gasholders on the site. Wide gaps between the buildings would allow for views out across Motspur Park to the west and the Sir Joseph Hood Memorial Playing Fields to the east. The proposed simple forms and restrained design approach, using high quality, durable materials, would work successfully with the local vernacular style.

8.23 A key component of the proposed development would be the provision of public space, children play areas, gardens and courtyards and enhanced habitats along Beverly Brook. The landscape design would allow for subtle nods towards the industrial legacy of the Site, for example by way of mirroring the footprint of the gasholders in the layout of paths and benches. Wildflower areas, additional trees and open lawns for various activities would complement the landscape offerings.

8.24 The proposed development would have a **High** magnitude of impact on TCA3. The proposed development would mark a demonstrable improvement to the character, appearance and function to the area, including comprehensive public space improvements and new planting.

8.25 The resultant likely effect is **Moderate**. The effect is **Beneficial**. The effect would be significant, local, direct and long-term**.**

CUMULATIVE ASSESSMENT

8.26 The cumulative condition set out at **Section 2.0** has been considered in terms of potential effects on the TCAs within the study area.

8.27 Across the local and wider area, the proposed development could be glimpsed in conjunction with the cumulative scheme. Due to its nature as a sports facility, the cumulative scheme would be read and understood alongside the existing Fulham FC facilities at Motspur Park. The susceptibility of the TCAs to the Development in the study area would remain the same in the cumulative context. For the cumulative condition, the effects would remain the same as in the proposed scenario.

SECTION SUMMARY

8.28 The findings of the assessment of likely effects on townscape receptors is summarised at **Table 8.1** below.

8.29 Summary of likely effects on heritage receptors. Significant likely effects are shaded in blue.

REF	TOWNSCAPE RECEPTOR	TOWNSCAPE VALUE	SUSCEPTIBILITY	SENSITIVITY	MAGNITUDE (CONSTRUCTION)	LIKELY EFFECT (CONSTRUCTION)	MAGNITUDE (OPERATIONAL)	LIKELY EFFECT (OPERATIONAL)	LIKELY EFFECT (CUMULATIVE)
1	Interwar housing	Low	Medium	Medium	Low	Minor Adverse	Low	Minor Beneficial	Minor Beneficial
2	Green spaces and sports facilities	Medium	Medium	Medium	Very Low	Negligible Adverse	Medium	Moderate Beneficial	Moderate Beneficial
3	Infrastructure	Low	Low	Low	Low	Minor Adverse	High	Moderate Beneficial	Moderate Beneficial
4	Commercial/Industrial Use	Low	Not assessed						

Table 8.1 Summary of likely effects on townscape receptors.

9.0
ASSESSMENT OF EFFECTS: VISUAL
MOTSPUR PARK GAS HOLDERS

ASSESSMENT OF EFFECTS: VISUAL

9.1 This section assesses the likely effect arising from the impact of the Development on the visual receptors identified in **Table 6.1**. The assessment is informed by the ZTV at **Figure 2.1** and the verified views provided at **Appendix 1.0**. the AVRs show the proposed development as render. Where wirelines are used, green wirelines indicate the proposed buildings, brown wirelines the cumulative schemes.

REPRESENTATIVE VIEWS - DEMOLITION AND CONSTRUCTION STAGE

9.2 ES Volume 1 Chapter 5 sets out the anticipated programme of Works and the key activities that would be undertaken during site clearance and construction necessary to facilitate the proposed development.

9.3 The Works would have a limited effect on the value of visual receptors identified in the baseline of this chapter. This is because construction effects are temporary, of short to medium-term duration, indirect and local. The susceptibility and sensitivity to change is summarised at the beginnings of the assessment for each receptor, which apply to the demolition and construction phase also.

9.4 In terms of the likely effects on visual receptors, the activities at this stage of the proposed development would include the visibility of construction activities in the local area, such as hoarding, construction traffic and tall equipment. This stage of the Development would include cranes appearing as part of the skyline.

9.5 There would be a marked increase in the quantum of activity and scale of construction apparatus required on Site relative to the existing condition. Each receptor group would experience the demolition and construction phase in a similar way, although the environmental impacts from dust, traffic and general activity would be most acute from the immediate surroundings of the Site. Residents, particularly those on Motspur Park to the west, the users of the Sir Joseph Hood Memorial Playing Field and the users of the Motspur Park sports ground to the west, would experience some of these environmental impacts, but mainly the visual impact of cranes and other construction equipment. Based on the above, receptors have a moderate ability to accommodate the type of change proposed and therefore a **Medium** susceptibility to change. The sensitivity of the receptors is **Low to Medium.**

9.6 The nature of the effect often reverts to **Adverse** owing to the changes to the ability to appreciate the visual amenity where close in proximity to the Site. Impacts from a distance are more likely to be neutral in nature due to the relatively limited visual impact, often experienced in transit and as part of a wider panorama.

9.7 These visual and environmental impacts would vary in magnitude according to proximity and orientation of visual receptors in relation to the Site.

9.8 For the following receptor, a **Very Low** magnitude of impact, resulting in an effect of **Negligible Adverse** during the Works phase, is identified: Amenity users of other open spaces, Commuters.

9.9 For the following views, a **Low** magnitude of impact, resulting in an effect of **Minor Adverse** during the Works phase, is identified: Users of Sir Joseph Hood Memorial Playing Fields, Users of the Motspur Park sports ground and Residents in vicinity of the Site

9.10 The effects are temporary, short-term and reversible. All are not significant.

STATIC VIEWS - DEMOLITION AND CONSTRUCTION STAGE

9.11 In terms of the static views, VHIV2 and VHIV6, the separating distance is such that the magnitude of impact would be **Nil** and the likely effect therefore **None**.

REPRESENTATIVE VIEWS - COMPLETED DEVELOPMENT STAGE

USERS OF SIR JOSEPH HOOD MEMORIAL PLAYING FIELDS

9.12 Receptors in this group are the users of the Sir Joseph Hood Memorial Playing Fields, enjoying the expansive open space for various outdoor leisure and sports activities. They are likely to be focused on the green open space and immediate locality, while having an awareness of the wider urban context of London beyond the boundaries of the green space. The Sir Joseph Hood Memorial Playing Fields are a large expanse of open green space, embedded in the much larger swathe of MOL across this part of West London.

9.13 Receptors forming part of the group are generally engaged in recreational activities, with their focus being on the open space. Receptors will have an awareness of the built environment beyond the playing fields, such as the Fulham FC site, the twelve storey block of One New Malden at Blagdon Road or the Barratt development at the Tesco car park, however, this will be secondary in their focus. Receptors have a medium ability to accommodate the type of change proposed and therefore a **Medium** susceptibility to change. The sensitivity of the receptors is **Medium**.

9.14 Sir Joseph Hood Memorial Playing Fields represents the area with the greatest potential intervisibility due to the expanse and open character of the grass land and lack of buildings in the foreground that foreshorten visibility, so that the proposed buildings would be very noticeable (Views 1, 2, 11, 12, 14, 21 and 22). Nevertheless, the area of woodland and the vegetation along Beverley Brook would screen the lower floors of the proposed buildings and would soften the scheme's potential impacts and the buildings would be seen across some distance. They would be understood as part of the surrounding residential townscape. Receptors would appreciate the removal of the large volumes of the gasholders currently on the Site. While visually permeable, the industrial nature of these structures has a character alien to the residential context of Motspur Park.

9.15 The alignment of the proposed buildings is such that there would be views through the gaps, allowing visual connections through to the land to the west of the site. Depending on the receptor's position in relation to the site, the gaps would reduce. The varying heights and the proposed elevational treatment would, however, ensure that the proposed development is understood as five individual, subtly different buildings.

9.16 Receptors would notice the high quality architectural set piece. The buff brick elevations would appear above the trees. Bricks in different combinations will be used to create variety between the buildings. Brick window surrounds, metalwork and horizontal banding along the parapets would create visual interest. The proposed development would be read as a family of buildings, successfully balancing collective appearance and their individual expression.

9.17 Due to the vegetation along Beverley Brook, the lower parts of the proposed development would be obscured. The proposed development would be understood as part of the established residential environment

in which the site falls, comprising the low-rise terraces and semi-detached houses in the immediate context, and taller buildings further afield. Approaching the site, receptors would notice the proposed landscape design, transforming the pedestrian experience along Beverley Brook and the western border of the Sir Joseph Hood Memorial Playing Fields. New trees, shrubs and play equipment would be visible.

9.18 As a result of the above, the proposed development would have a **High** magnitude of impact to the receptors. It would therefore give rise to **Moderate to Major** likely effect. The effect would be **Beneficial**, as, while the proposed development introduces building mass into the views, the architectural quality of the proposed buildings would improve the visual amenity. The effects are permanent, long-term and significant.

USERS OF MOTSPUR PARK SPORTS GROUND

9.19 Receptors in this group are the users of sports ground, located immediately to the west of the railway line. The area has an extant planning permission for training facilities for Fulham FC. Receptors will be undertaking various outdoor leisure and sports activities. They are likely to be focused on the open space and immediate locality, while having an awareness of the wider urban context of London beyond the adjoining properties and the railway line.

9.20 Receptors will be aware of the Fulham Football Club's plans to build new facilities. As a result, they have a high ability to accommodate the type of change proposed and therefore a **Low** susceptibility to change. The sensitivity of the receptors is **Low**.

9.21 The gasholders' large volume, while visually permeable, is a prominent piece of industrial infrastructure, that with a different character to the surrounding townscape. The proposed development would replace the gasholders with a design that would sit comfortably within the residential context of Motspur Park. Receptors would notice the compelling design approach, introducing four new volumes with subtle colour variations, with brick elevations, reflecting the local housing stock.

9.22 As a result of the above, the proposed development would have a **High** magnitude of impact to the receptors. It would therefore give rise to **Moderate** likely effect. The effect would be **Beneficial**, as, while the proposed development introduces building mass into the views, the architectural quality of the proposed buildings would improve the visual amenity. The effects are permanent, long-term and significant.

AMENITY USERS OF OTHER OPEN SPACES

9.23 Receptors within the open space are likely to be people using the space for amenity, sports and enjoyment, with their focus being on the green and open space, in an otherwise built-up environment. Attention of the receptors will likely be focussed on their respective activities within the open space, however, receptors will also have an awareness of the developments beyond the open spaces. As a result, receptors are judged to have a **Medium** susceptibility to change, resulting a **Medium** sensitivity.

9.24 Views 6, 13, 17 and 20 and 26 to 29 demonstrate that the proposed development would be largely screened by a combination of mature tree cover and intervening built form. As receptors move through these open spaces, the proposed development would remain largely obscured from view. There may be occasional glimpses of the proposed development through gaps between trees and above existing development; however, these views would generally be limited to parts of the roofscape. In such instances, the proposed development would appear as a peripheral element, filtered by vegetation. It would be perceived as part of the broader townscape beyond the open spaces.

9.25 Whilst receptors would have an awareness of the townscape surrounding the open space, receptors are likely to be concentrating on their leisurely activities, the slight change through the minimal visibility of the proposed development will not alter how these views are considered.

9.26 As a result of the above, the proposed development would have a **Nil** magnitude of impact to the receptors. It would therefore give rise to **None** likely effect.

COMMUTERS

9.27 Commuters would comprise residents of the area around Motspur Park station, commuting to and from central London. Their susceptibility is judged to be Medium, given the existing context and their primary focus on traffic, wayfinding and their destinations. Receptors would have a **Medium** susceptibility to change, resulting a **Low to Medium** sensitivity.

9.28 View 5 is taken from the footbridge across the railway line and corresponds with Motspur Park station. Currently, the gasholders are a feature in the view from the bridge. The station is embedded in the high street cluster to the east of the tracks, comprising the West Barnes Library and shops on West Barnes Lane. View 18 is taken from the level crossing of the railway, closer to the site but not from an elevated position.

9.29 Visual receptors would be focussing on wayfinding and their destinations and experience their built surroundings peripherally. The proposed development would introduce a new, vertical element which would sit comfortably in the mixed-use town centre like environment along the railway corridor at Motspur Park station. The proposed development would be understood to help mark the station, which would have beneficial visual impacts to this receptor group in terms of wayfinding and legibility.

9.30 The detailed design of the proposed development would introduce positive and attractive development into the visual experience of receptors. Detailing such as the large balconies with their metal work, the strong vertical emphasis of the brick piers and horizontal banding at the parapets would add further visual interest. The selection of materials and the colour palette, comprising varying shades of green and buff brick hues, would ensure the buildings form a family, with subtle differences, while relating to the verdant nature of Motspur Park and the surrounds. For this reason, receptors would appreciate the removal of the large volumes of the gasholders currently on the Site. While visually permeable, the industrial nature of these structures has a character alien to the residential context of Motspur Park.

9.31 The magnitude of impact is judged to be **Medium**. This results in a likely **Moderate** effect. The effect is judged to be **Beneficial** because of the wayfinding benefits and the high quality of the architecture. The effects are permanent, long-term and significant.

RESIDENTS IN VICINITY OF THE SITE

9.32 This group comprises receptors moving through the study area on the way to and from their properties. Receptors are likely to be residents from the area with a degree of familiarity with the general townscape. The focus of the receptors would be on the streets, traffic and the activities in which they are partaking in. They would experience varying degrees of change to their visual amenity depending on where they are positioned in relation to the proposed development.

9.33 As receptors travel along the surrounding roads, they will perceive the uniform nature of the townscape, characterised by standard residential

typologies, primarily semi-detached houses and short terrace with limited architectural styles and material treatments, dating from the Interwar period to the second half of the 20th century. Receptors would be aware of the presence of the modern facilities of the capital, such as the retail park at the junction of the A3 and Burlington Road to the north and New Malden town centre to the west. Receptors would have a **Medium** susceptibility to change, resulting in a **Low to Medium** sensitivity.

9.34 Due to its location adjacent to the railway and the wooded area that is surrounds, the Site is some distance away from the nearest houses. Nevertheless, receptors would appreciate the removal of the large volumes of the gasholders currently on the Site. While visually permeable, the industrial nature of these structures has a character alien to the residential context of Motspur Park.

9.35 Viewpoint 23 offers a direct view of the proposed development across the allotments that separate the rear of the properties on Kingshill Avenue from the site boundary. The northern section of Kingsland Avenue is approximately 180 m away from the centre of the Site. Residents would be accustomed to a low-rise typology of development in the views along Kingshill Avenue. Depending on their position, receptors would experience change in scale and height resulting from the prosed buildings (Views 4, 7). The visual impact to residents would be increased at the southern end of the street, due to distance and alignment (View 7). To the west (View 4), the proposed development would be largely occluded by interposing buildings in the middle ground. Pylons and overhead lines add further distraction, reducing the proposed development's visual presence. Receptors on Mayfair Avenue, to the southwest, would experience the proposed development in a similar way (View 8). The buildings would be largely occluded by interposing development and not impact on the receptors' experience.

9.36 Overall, the proposed development would be understood as part of the townscape of Motspur Park, and while the proposed development would introduce a change in character of the townscape, the existing gasholders are also of a different character to the surrounding townscape. The proposed residential use would be congruent to the existing context. The proposed elevational treatment, the choice of brick and the colour palette, combined with the metalwork and horizontal banding, would ensure the proposed development would be read as fitting into the residential context of Kinghill Avenue, and be of high architectural quality.

9.37 Receptors moving eastwards along Motspur Park (View 3, 15), Portland Avenue or Bargate Close (View 9) would experience views of the proposed development. From most points in this area, only the upper part of the proposed development would be seen, obliquely at some distance above the established roofscape.

9.38 Approaching the Site, receptors would note the architectural quality. Broken into four elements of varying heights, the composition in combination with the elevational treatment would introduce visual interest. The choice of material and subtle variations in the colouration of the façades would embed the proposed development in the verdant character of the study area.

9.39 In the views from the north (Views 10 and 16), the proposed development would be seen at some distance, largely screened by existing development and interposing vegetation. In these instances, the proposed development would appear as a secondary element within the background of views, with the primary visual focus for receptors being the immediate activity in the foreground. The visibility of the proposed development behind would be consistent with the surrounding area and not introduce discordant forms or incongruous features.

9.40 As a result of the above, the magnitude of effect is judged to range from **Low to Medium**, resulting in a **Minor to Moderate** effect, depending on the receptors' position; applying professional judgement, the effects is deemed to be **Minor**. The nature of effect is judged to be **Beneficial**, due to the quality of the design. The effects are permanent, long-term and not significant.

STATIC VIEWS - COMPLETED DEVELOPMENT STAGE

9.41 Identified as Very Highly Important Views in the Kingston View Study Report, there are two static view locations in which the proposed development would fall.

9.42 VHIV2 is located within one of the state rooms of Hampton Court Palace, looking out over the Great Fountain Garden. VHIV6 is located in Bushy Park next to Heron Pond. Given their High visual value and their location, they have a **High** Sensitivity.

9.43 The non-verified views, provided at **Appendix 3.0**, demonstrate that the proposed development would be largely occluded by interposing existing buildings and vegetation both from Hampton Court (VHIV2) and Bushy Park (VHIV6). Across the separating distance of more than 6.5 km between the viewpoints and the site. It follows that the magnitude of impact would be **Nil** and the likely effect therefore **None**. The effects would be permanent, long-term and not significant.

CUMULATIVE CONDITION

9.44 As set out in **Section 2.0**, the cumulative condition, Fulham FC is planning a new facility on their Motspur Park training grounds to the west of the site, which are MOL. The buildings would have a height of approximately 12m, which would be taller than the surrounding housing stock. The cumulative scheme would not be visible with the proposed development, as demonstrated by the AVRs. As a result, the combined effects of the proposed development and the cumulative schemes would remain the same as in the proposed scenario for all visual receptors and the static views.

SUMMARY OF VISUAL IMPACT ASSESSMENT

9.45 The visual impact assessment is summarised in **Table 9.1.**

RECEPTORS	VISUAL AMENITY VALUE	SUSCEPTIBILITY	SENSITIVITY	MAGNITUDE OF IMPACT (DEMOLITION AND CONSTRUCTION STAGE)	LIKELY EFFECT (DEMOLITION AND CONSTRUCTION STAGE)	MAGNITUDE OF IMPACT (COMPLETED DEVELOPMENT STAGE)	LIKELY EFFECT (COMPLETED DEVELOPMENT STAGE)	LIKELY EFFECT (CUMULATIVE)
Receptor group								
Users of Sir Joseph Hood Memorial Playing Fields	Medium	Medium	Medium	Low	Minor Adverse	High	Moderate/ Major Beneficial	Moderate/ Major Beneficial
Users of Motspur Park sports ground	Low	Low	Low	Low	Minor Adverse	High	Moderate Beneficial	Moderate Beneficial
Amenity users of wider MOL and other open green spaces	Medium	Medium	Medium	Very Low	Negligible Adverse	Nil	None	None
Commuters	Low	Medium	Low–Medium	Very Low	Negligible Adverse	Low	Moderate Beneficial	Moderate Beneficial
Residents in vicinity of the Site	Low	Medium	Low–Medium	Low	Minor Adverse	Low to Medium	Minor Beneficial	Minor Beneficial
Static views								
VHIV2 (Hampton Court)	High	High	High	Nil	None	Nil	None	None
VHIV6 (Bushy Park)	High	High	High	Nil	None	Nil	None	None

Table 9.1 Summary of visual impact assessment

10.0
ADDITIONAL MITIGATION AND RESIDUAL EFFECTS
MOTSPUR PARK GAS HOLDERS

ADDITIONAL MITIGATION AND RESIDUAL EFFECTS

10.1 Mitigation measures proposed to prevent, reduce or offset any significant likely adverse effects have been identified and developed as part of the pre-application design process. The primary mitigation measures have become embedded into the project design, commonly referred to as embedded mitigation.

10.2 The likely effects of the proposed development include embedded mitigation. As a result, there is no requirement for additional mitigation and thus likely residual effects remain the same as the likely effects, unless otherwise stated.

10.3 A landscape strategy has been produced to enhance the site's landscape.

DEMOLITION AND CONSTRUCTION STAGE

10.4 As no additional mitigation would be proposed, the residual effects in relation to the demolition and construction stage would remain as reported in the assessment of likely effects section.

COMPLETED DEVELOPMENT STAGE

10.5 As no additional mitigation would be proposed, the residual effects in relation to the completed development stage would remain as reported in the assessment of likely effects section.

11.0
CONCLUSION
MOTSPUR PARK GAS HOLDERS

CONCLUSION

11.1 Montagu Evans has been instructed by the Applicant to provide consultancy services and produce this TVA in relation to the proposed development which is subject to a detailed application for the redevelopment of the former Motspur Park gasholder site.

11.2 The proposed development has been prepared following detailed and lengthy consultation with the affected LPAs, GLA and DRP.

11.3 Overall, this report concludes the proposed development would lead to effects on townscape receptors between Minor Beneficial to Moderate Beneficial and Visual Receptors of None to Moderate–Major Beneficial.

11.4 There are no heritage impacts. Heritage has been scoped out of the assessment. A separate Heritage Statement has been submitted as part of this planning application.

POLICY COMPLIANCE

11.5 The TVA concludes that the proposed development would comply with Policies D1, D3, D4, D5, D8 and D9 of the London Plan; Policies C3, DM5, CS8, DM10 and DM11 of RBKuT's 2012 Core Strategy, Policies D12.–3 and D12.6 of LBM's Local Plan (2024); and paragraphs 207, 210, 212–216 and 219 of the NPPF

APPENDIX 1: AVRS

MOTSPUR PARK GAS HOLDERS

1853 - MOTSPUR PARK
AVR IMAGES

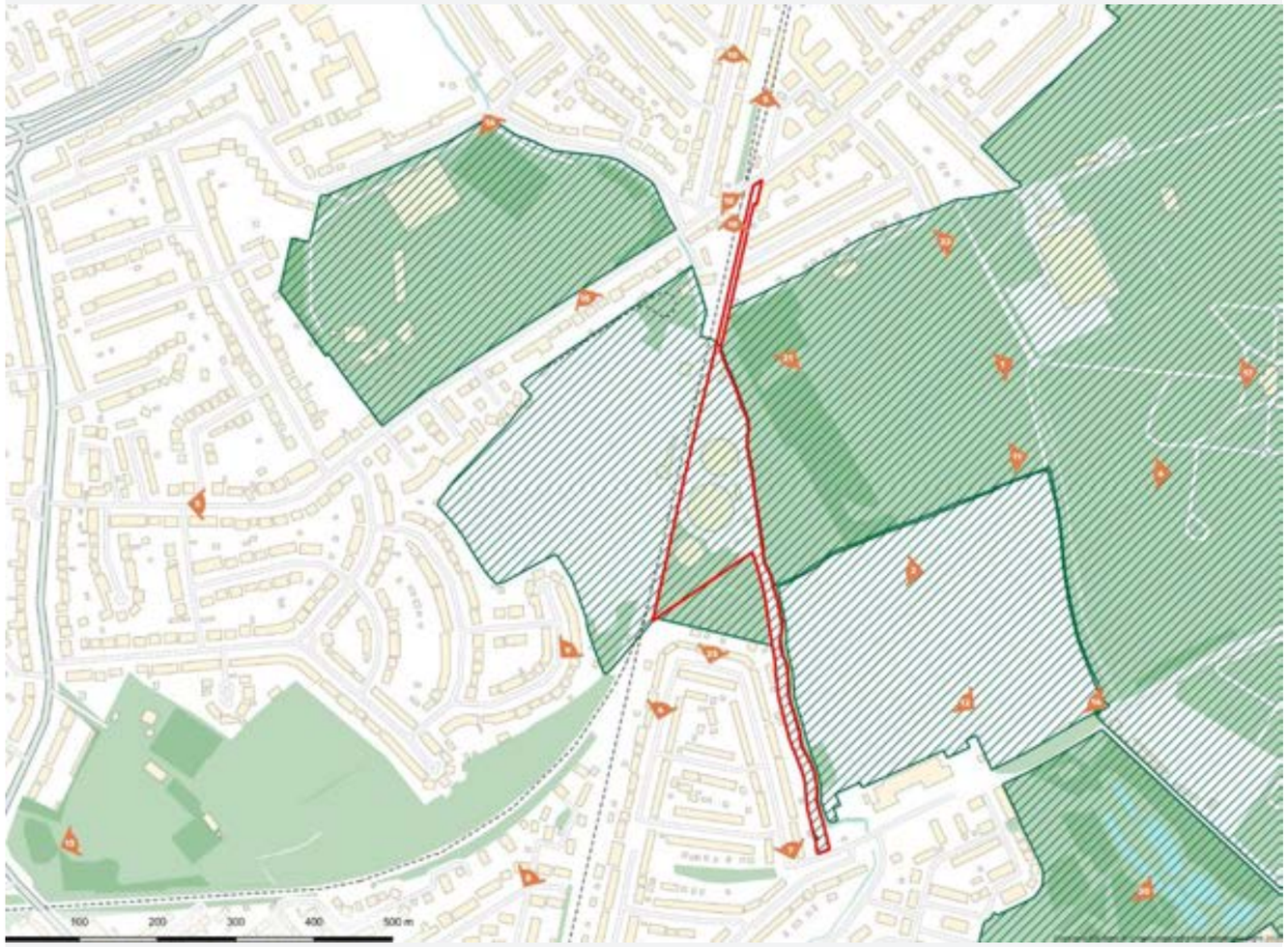
PREPARED FOR 18.09.2025

Welcome —

Introduction

This document contains 23 TVIA views for Motspur Park, in New Malden.

Content



Location Map

Indicative location positions for the TVIA views.

1 VP01 Sir Joseph Hood Memorial Playing Field near Cemetery Entrance

1853_PLA_00_011_0_00 BASELINE

ENLARGEMENT FACTOR 41% @A3, 115% @A0

INFO@ROCKHUNTER.CO.UK
ROCKHUNTER.CO.UK
+44 (0)20 7627 0416

PROPOSED

1853_PLA_00_011_7_00

TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0

1853_PLA_00_011_8_00

PROPOSED WITH CUMULATIVE

ENLARGEMENT FACTOR 41% @A3, 115% @A0

INFO@ROCKHUNTER.CO.UK
ROCKHUNTER.CO.UK
+44 (0)20 7627 0416

2 VP02 Paddocks Permissive Footpath

1853_PLA_00_021_0_00 BASELINE

ENLARGEMENT FACTOR 41% @A3, 115% @A0

INFO@ROCKHUNTER.CO.UK
ROCKHUNTER.CO.UK
+44 (0)20 7627 0416

PROPOSED

1853_PLA_00_021_7_00

TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0

1853_PLA_00_021_8_00

PROPOSED WITH CUMULATIVE

ENLARGEMENT FACTOR 41% @A3, 115% @A0

INFO@ROCKHUNTER.CO.UK
ROCKHUNTER.CO.UK
+44 (0)20 7627 0416

3 VP04 Kingshill Avenue

1853_PLA_00_041_0_00 BASELINE

ENLARGEMENT FACTOR 41% @A3, 115% @A0

INFO@ROCKHUNTER.CO.UK
ROCKHUNTER.CO.UK
+44 (0)20 7627 0416

PROPOSED

1853_PLA_00_041_7_00

TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0

1853_PLA_00_041_8_00

PROPOSED WITH CUMULATIVE

ENLARGEMENT FACTOR 41% @A3, 115% @A0

INFO@ROCKHUNTER.CO.UK
ROCKHUNTER.CO.UK
+44 (0)20 7627 0416

4 VP05 Motspur Park Train Station Footbridge

1853_PLA_00_051_0_00 BASELINE

ENLARGEMENT FACTOR 41% @A3, 115% @A0

INFO@ROCKHUNTER.CO.UK
ROCKHUNTER.CO.UK
+44 (0)20 7627 0416

PROPOSED

1853_PLA_00_051_7_00

TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0

1853_PLA_00_051_8_00

PROPOSED WITH CUMULATIVE

ENLARGEMENT FACTOR 41% @A3, 115% @A0

INFO@ROCKHUNTER.CO.UK
ROCKHUNTER.CO.UK
+44 (0)20 7627 0416

5 VP07 Corner of Green Lane and Kingshill Avenue

1853_PLA_00_071_0_00 BASELINE

ENLARGEMENT FACTOR 41% @A3, 115% @A0

INFO@ROCKHUNTER.CO.UK
ROCKHUNTER.CO.UK
+44 (0)20 7627 0416

PROPOSED

1853_PLA_00_071_5_00

TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0

1853_PLA_00_071_8_00

PROPOSED WITH CUMULATIVE

TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0

INFO@ROCKHUNTER.CO.UK
ROCKHUNTER.CO.UK
+44 (0)20 7627 0416

6 VP08 Mayfair Avenue (Close to junction with Broadmead Avenue)

1853_PLA_00_081_0_00 BASELINE

ENLARGEMENT FACTOR 41% @A3, 115% @A0

INFO@ROCKHUNTER.CO.UK
ROCKHUNTER.CO.UK
+44 (0)20 7627 0416

PROPOSED

1853_PLA_00_081_5_00

TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0

1853_PLA_00_081_8_00

PROPOSED WITH CUMULATIVE

TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0

INFO@ROCKHUNTER.CO.UK
ROCKHUNTER.CO.UK
+44 (0)20 7627 0416

7 VP09 Bargate Close

1853_PLA_00_091_0_00 BASELINE

ENLARGEMENT FACTOR 41% @A3, 115% @A0

INFO@ROCKHUNTER.CO.UK
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+44 (0)20 7627 0416

PROPOSED

1853_PLA_00_091_5_00

TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0

1853_PLA_00_091_8_00

PROPOSED WITH CUMULATIVE

TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0

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+44 (0)20 7627 0416

8 VP10 Claremont Avenue (Close to junction with Consfield Avenue)

1853_PLA_00_101_0_00 BASELINE

ENLARGEMENT FACTOR 41% @A3, 115% @A0

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+44 (0)20 7627 0416

PROPOSED

1853_PLA_00_101_5_00

TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0

1853_PLA_00_101_8_00

PROPOSED WITH CUMULATIVE

TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0

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9 VP11 Sir Joseph Hood Memorial Playing Field

1853_PLA_00_111_0_00 BASELINE

ENLARGEMENT FACTOR 41% @A3, 115% @A0

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PROPOSED

1853_PLA_00_111_5_00

TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0

1853_PLA_00_111_8_00

PROPOSED WITH CUMULATIVE

TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0

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10 VP12 Southern End of Paddocks Permissive Footpath

1853_PLA_00_121_0_00 BASELINE

ENLARGEMENT FACTOR 41% @A3, 115% @A0

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PROPOSED

1853_PLA_00_121_7_00

TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0

1853_PLA_00_121_8_00

PROPOSED WITH CUMULATIVE

ENLARGEMENT FACTOR 41% @A3, 115% @A0

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11 VP13 "Entrance from Malden Road into Manor Park (RBKuT Important View 120)"

1853_PLA_00_131_0_00 BASELINE

ENLARGEMENT FACTOR 41% @A3, 115% @A0

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PROPOSED

1853_PLA_00_131_5_00

TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0

1853_PLA_00_131_8_00

PROPOSED WITH CUMULATIVE

TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0

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12 VP14 Lower Morden Equestrian Centre

1853_PLA_00_141_0_00 BASELINE

ENLARGEMENT FACTOR 41% @A3, 115% @A0

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PROPOSED

1853_PLA_00_141_5_00

TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0

1853_PLA_00_141_8_00

PROPOSED WITH CUMULATIVE

TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0

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13 VP15 No. 124 Motspur Park

1853_PLA_00_151_0_00 BASELINE

ENLARGEMENT FACTOR 41% @A3, 115% @A0

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ROCKHUNTER.CO.UK
+44 (0)20 7627 0416

PROPOSED

1853_PLA_00_151_5_00

TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0

1853_PLA_00_151_8_00

PROPOSED WITH CUMULATIVE

TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0

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14 VP16 "Blakes Lane in front of Horticultural Society (RBKuT Important View 121A)"

1853_PLA_00_161_0_00 BASELINE

ENLARGEMENT FACTOR 41% @A3, 115% @A0

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PROPOSED

1853_PLA_00_161_5_00

TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0

1853_PLA_00_161_8_00

PROPOSED WITH CUMULATIVE

TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0

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15 VP18 West Barnes Lane at railway crossing

1853_PLA_00_181_0_00 BASELINE

ENLARGEMENT FACTOR 41% @A3, 115% @A0

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PROPOSED

1853_PLA_00_181_7_00

TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0

1853_PLA_00_181_8_00

PROPOSED WITH CUMULATIVE

ENLARGEMENT FACTOR 41% @A3, 115% @A0

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16 VP18 West Barnes Lane at railway crossing - Dusk

1853_PLA_00_182_0_00 BASELINE

ENLARGEMENT FACTOR 41% @A3, 115% @A0

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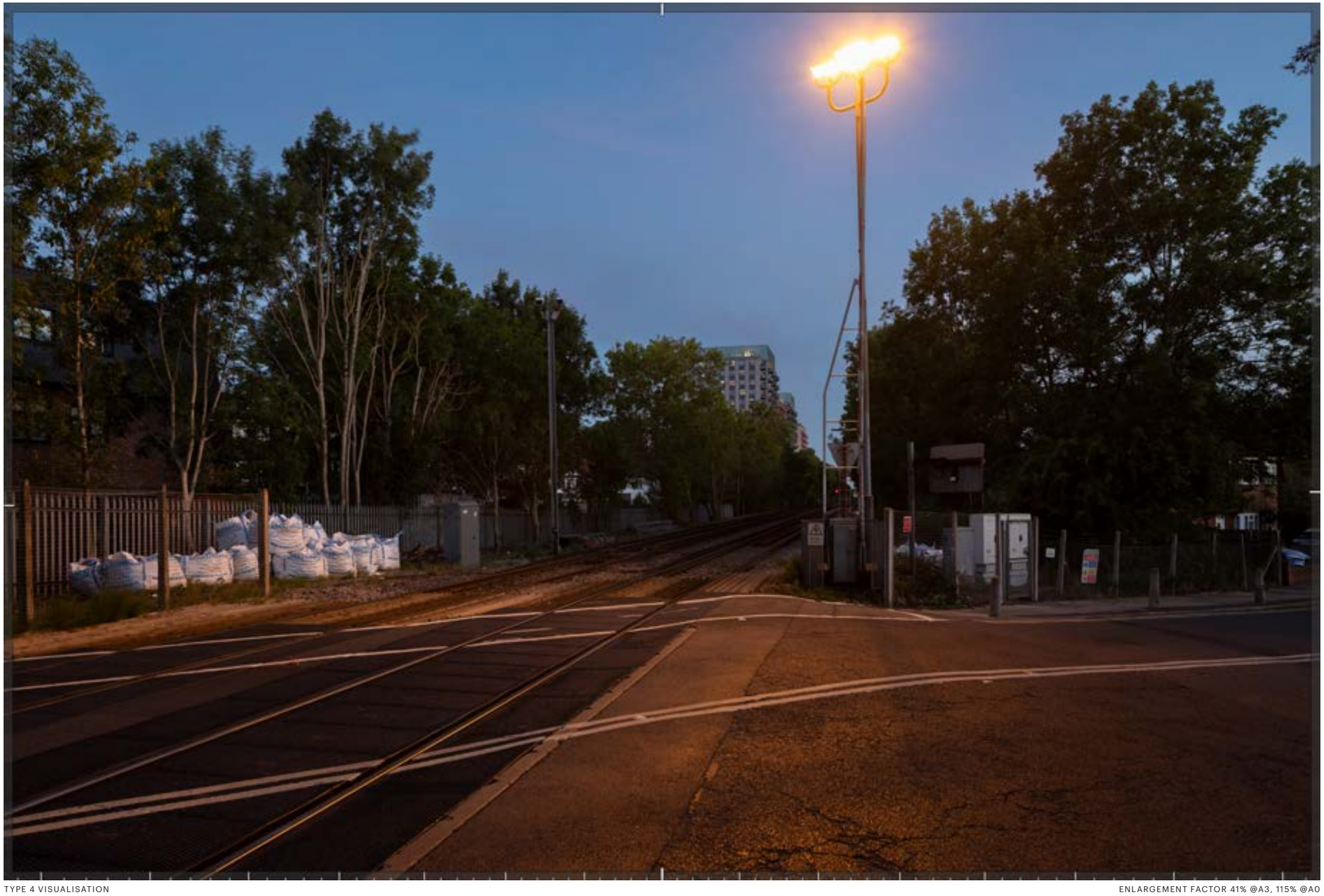
PROPOSED

1853_PLA_00_182_7_00



TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0

1853_PLA_00_182_8_00

PROPOSED WITH CUMULATIVE

ENLARGEMENT FACTOR 41% @A3, 115% @A0

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17 VP19 West Barnes Lane at northern site entrance

1853_PLA_00_191_0_00 BASELINE

ENLARGEMENT FACTOR 41% @A3, 115% @A0

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PROPOSED

1853_PLA_00_191_5_00

TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0

1853_PLA_00_191_8_00

PROPOSED WITH CUMULATIVE

TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0

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18 VP20 Mayflower Park Wetlands

1853_PLA_00_201_0_00 BASELINE

ENLARGEMENT FACTOR 41% @A3, 115% @A0

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PROPOSED

1853_PLA_00_201_7_00

TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0

1853_PLA_00_201_8_00

PROPOSED WITH CUMULATIVE

ENLARGEMENT FACTOR 41% @A3, 115% @A0

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19 VP21 In front of Sir Joseph Memorial Wood board

1853_PLA_00_211_0_00 BASELINE

ENLARGEMENT FACTOR 41% @A3, 115% @A0

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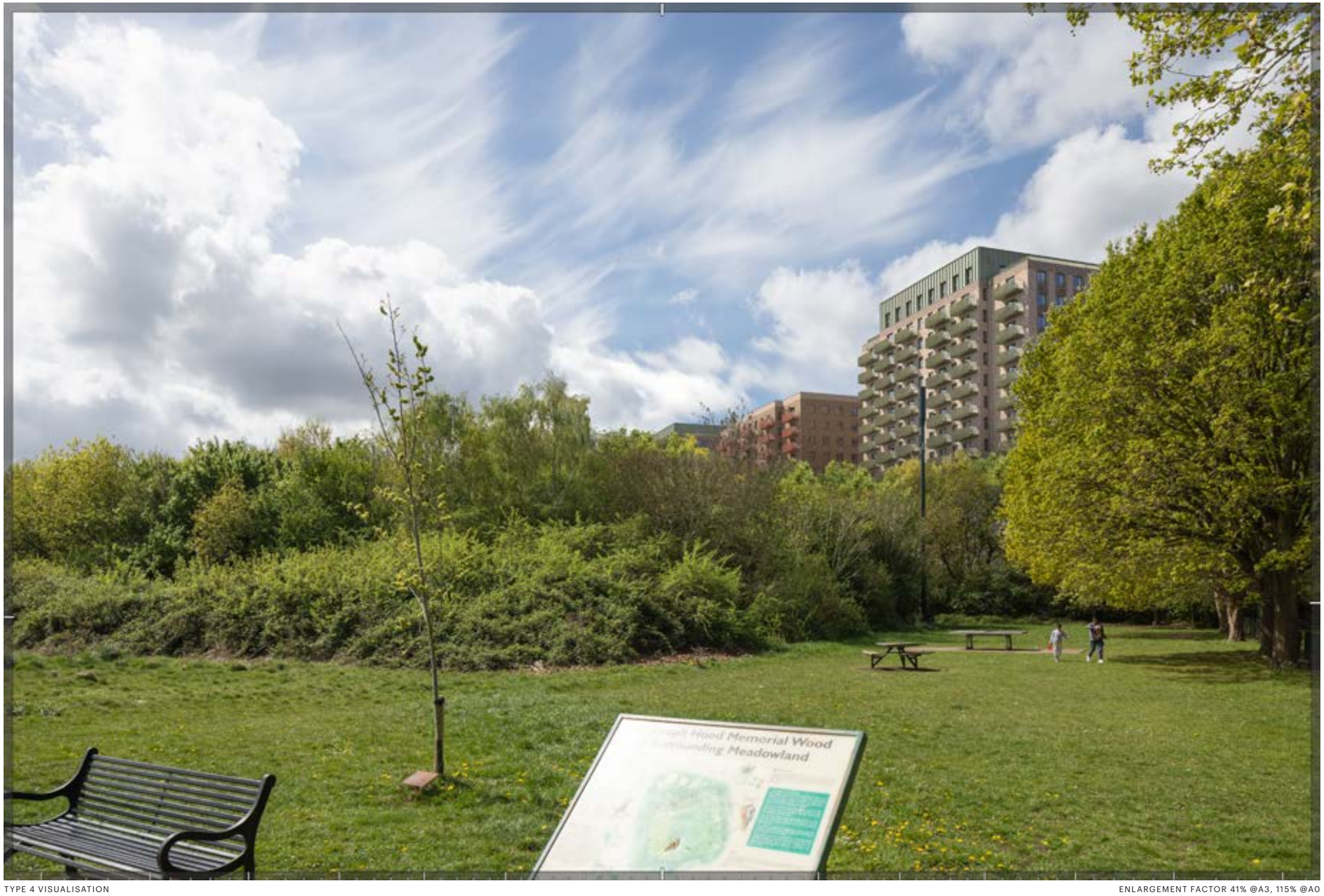
+44 (0)20 7627 0416

PROPOSED

1853_PLA_00_211_7_00



TYPE 4 VISUALISATION

ENLARGEMENT FACTOR 41% @A3, 115% @A0