

## Eleanor Friston

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**From:** Sarah Buxton <sarah.buxton@sutton.gov.uk>  
**Sent:** 08 December 2025 16:00  
**To:** Planning Representations  
**Subject:** 25/P2859 - "Motspur Park Gas Holders SW Of West Barnes Lane London KT3 6NQ"

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To who it may concern,

Demolition of existing gasholders and associated above ground structures and buildings. Phased redevelopment of site to provide 8 to 16 storey 5nos blocks with 586 residential units and ancillary residential facilities (C3 Use Class), together with associated works to the existing accesses and internal vehicular routes, new pedestrian and cycle routes, the provision of new publicly accessible open space, amenity space, hard and soft landscaping, cycle and car parking, works to the brook embankment, re-siting of some gas infrastructure, ground works and plant and associated works. Cross boundary application with LB Merton: Development within Merton comprises works to existing vehicle access onto West Barnes Lane, including hard and soft landscaping and new public realm and associated ground works, to provide pedestrian and cycle route with access for emergency vehicles only, new pedestrian/cycle access routes to Marina Avenue and Sir Joseph Hood Memorial grounds. Application accompanied by an Environmental Statement.

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### Introduction

This is the London Borough of Sutton (LBS) response to the planning application, by Berkeley Homes, for the redevelopment of the site known as Motspur Park Gasholder. It follows a public meeting, which was held on 25th September, and was attended by in the region of 60 local residents. A number of relevant issues were raised during that meeting, and these are discussed below.

### Parking

It is noted that a total of 89 car parking spaces are proposed, for 586 homes. Given that the site is within PTAL part 1a/1b and Part 0, so the PTAL could barely be worse. London Plan standards allow for 1.5 spaces per dwelling for outer London sites with PTAL level of 0-1. So a theoretical maximum spaces for the site is 879 spaces (586 units x 1.5). The proposals for the site include 89 spaces, and residents are concerned that parking will be displaced, beyond the existing CPZ and into the Hamptons estate. This raises a question of fairness (or, to put it another way, of the developer externalising legitimate costs of his development onto the residents of the Hamptons) of LBS residents paying for residents permits as a result of this additional parking pressure. This cost must be borne, in full, by the developer. It is suggested that permits for Hamptons residents should be funded for a period of at least ten years from the date of the 90th occupation of the gasholder development (on the assumption that the first 89 apartments would be offered a parking space within the development).

### Congestion and Highway Safety

Green Lane, in particular but not exclusively, is very congested, and the proximity of a school to the proposed entrance to, and exit from, the proposed development site is a significant safety concern for local residents. In addition, the existing congestion risks hindering emergency vehicles. It is understood that the applicant maintains the position that due to the low (possibly inadequate) amount of car parking proposed within its development, impacts will be negligible. Residents remain unconvinced, and continue to seek further technical assessment of the impacts of traffic from the development, to provide reassurance that the development would not create a 'tipping point' to gridlock.

### Trains, walking and cycling

Following a meeting with the train operator, and Network Rail, it is apparent that sufficient capacity exists for new residents to use train services from Motspur Park station, including during peak times. Planned investment to upgrade capacity on these services will also provide additional capacity which could serve the new development.

To support this, and given the very low amount of car parking proposed, it is essential that high quality sustainable transport infrastructure is funded by the development. This may include improvements to cycling facilities, including routes to the station and beyond, and improved cycle parking at the station itself.

### Demolition and Construction

There is a significant risk of contamination from material that needs to be removed from the site, including but not limited to steel sections from the gasometers, and soil from the site which is highly likely to contain contamination. Soil Hospitals will be required, and this must form a component part of any Construction Management Plan (CMP).

A requirement for large vehicles, to transport potentially hazardous material, through congested residential streets, requires very careful consideration. It is understood that tracking drawings indicate potential conflict points within LBS highways network, and the Council is very concerned about this issue. The developer must engage with LBS proactively and urgently, to identify and resolve these conflict points without the need for physical works to the highway.

### Flooding

Surface water flood risk was highlighted as a significant concern for local residents, and it is noted that the site and wider area are within a Critical Drainage Area, accordingly the Sutton LLFA has the following comments.

Although the drainage strategy aligns with local and national policies and standards regarding reducing the existing risk of flooding from surface water, the information in the supporting calculations does not correspond to the drainage strategy. Robust calculations which prove that the drainage strategy is feasible must be provided by the applicant, especially given that the location is classified as a critical drainage area by both Sutton and Kingston Councils.

The site is partially within Flood Zone 2 and the northern access road is in Flood Zone 3. Development which is to be carried out on land within Flood Zone 2 or 3 should avoid the highest risk areas and be safe without increasing flood risk elsewhere. The Local Planning Authority must consult the Environment Agency before the grant of permission (The Town and Country Planning (General Permitted Development) (England) Order, 2015).

LBS considers that the proposal materially conflicts with the development plan, when taken as a whole, and planning permission should be refused as a result.

The site has a number of significant constraints, including significant policy constraints. It lies within a Critical Drainage Area, and flood risk implications are discussed above. A designated Green Corridor runs adjacent to the site, which would be directly impacted by the proposed development through intensification of use by new residents, as well as increased predation of wildlife caused by an increase in cats in the new homes.

Part of the site is covered by allotments, which have statutory protection, and which being in short supply must be re-provided to at least equivalent quantity and quality before any new homes are built.

The site is covered by a number of other important designations including Green Chain, SINC, and MOL. These designations at least strongly suggest, if not requiring, that planning permission should be refused for the development.

The London Plan, which is up to date, contains two key policies of relevance to the application. Policy G3 Metropolitan Open Land says that

“Metropolitan Open Land (MOL) is afforded the same status and level of protection as Green Belt: 1) MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt ...”

Policy D9 Taller Buildings is clear that local plans should identify areas suitable for taller buildings, and show them on proposals maps.

Policy D9 goes on to state that

“Development proposals should address the following impacts:

1) visual impacts

a) the views of buildings from different distances

i long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views

ii mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality

iii immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy...”

This is crucial to the assessment of planning balance, because all of the provisions of Policy D9 must be satisfied for the proposal to be considered to be appropriate development. The importance here is that Policy G3 is clear that “MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt”

This requires an assessment of the proposal against the national planning policy tests that apply to

Green Belt.

The National Planning Policy Framework sets out the purposes of Green Belt as follows:

“ Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”

It is clear that each of these purposes is offended by the proposal, because the development would result in: sprawl into the MOL, effectively closing the gap between Motspur Park and Worcester Park, fundamentally altering the character and appearance of the entire area; the coalescence of Motspur Park and Worcester Park; encroachment into the MOL, which has open countryside character; materially harm the setting and special character of Worcester Park by introducing a jarring juxtaposition between residential towers and low rise suburban housing; and would not result in recycling of derelict urban land, by virtue of the site lying within MOL outside the urban area.

NPPF Paragraph 153 says

“When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness . Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.”

These paragraphs are determinative, in this case, which is an application for a number of tall buildings. It is argued that ‘very special circumstances’ cannot be demonstrated in this case, because the harm (to MOL) resulting from the proposal, and other harm including flood risk, displaced parking, loss of allotments, risk to wildlife, and unmitigated impact on Green Corridor and Green Chain, clearly outweighs the benefits of the proposal, which are limited to the delivery of new housing.

The Mayor of London is clear that the “golden rules” set out in the NPPF, relating to Green Belt, do not apply to MOL. It is therefore not arguable that the site is “Grey Belt”, rather it is MOL, which the London Plan confirms is “afforded the same status and level of protection as Green Belt (and that) MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt”

It is contended that the proposed development clearly represents inappropriate development, in accordance with the relevant tests, and given also that the site is not within an area of taller buildings potential, and that in the absence of very special circumstances to justify its release from MOL, planning permission must be refused.

Kind Regards

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