

Chemicals, Explosives and  
Microbiology Hazard Division

**Berdine Clews**

Statutory and Commercial  
Land Use Planning Advice  
HSE, Harpur Hill,  
Buxton, Derbyshire,  
SK17 9JN

[lupenquiries@hse.gov.uk](mailto:lupenquiries@hse.gov.uk)

<http://www.hse.gov.uk/>

Head of Team  
Manuela Godden

(By email only)  
[planningsupport@london.gov.uk](mailto:planningsupport@london.gov.uk)

John Finlayson  
Development Management  
Greater London Authority

Your Ref: GLA/2026/0208/S3  
& GLA/2026/0209  
Local Planning Authority Refs:  
25/02562/FUL (Kingston) & 25/P2859  
(Merton)  
HSE Ref: L2959

Date: 9 July 2026

Dear Mr Finlayson,

**Land Use Planning Consultation with Health and Safety Executive  
Town and Country Planning (Development Management Procedure) (England)  
Order 2015**

**Planning application: 25/02562/FUL (Kingston) & 25/P2859 (Merton)**

**Proposal: 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.**

**Location: Motspur Park, KT3 6NG**

1. I am writing to you from the Land Use Planning (LUP) advice team of the Health and Safety Executive (HSE) in response to your email of 1<sup>st</sup> July 2026 informing us that the Mayor of London would act as the local planning authority for the planning applications to Kingston upon Thames Council and Merton Council to redevelop the Motspur Park Gasholder site, and informing us of a planning hearing on 21<sup>st</sup> July 2026. Our records

were checked for any correspondence from either Kingston Upon Thames or Merton Local Authority regarding this development, however, none was found.

2. Regarding the hearing at City Hall on 21 July, we do not see the need for us to attend this in person, however as a statutory consultee for planning applications at this location we can provide you with the following consultation responses for planning applications 25/02562/FUL (Kingston Council) & 25/P2859 (Merton Council).

### **HSE's role as a statutory consultee in the planning system**

3. The proposed development site identified in planning applications 25/02562/FUL (Kingston) & 25/P2859 (Merton) lies within the consultation distance of a site which has been granted consent by Kingston Upon Thames Council (Hazardous Substances Authority) to hold hazardous chemicals. This is the Southern Gas Networks Plc site at Worcester Park Gasholder Station, New Malden (HSE ref H1734) which has consent to hold natural gas.
4. The proposed development site also lies in the consultation zones of a Major Accident Hazard Pipeline (MAHP) – the 6965\_1237 - Chessington PT / Worcester Park PRS natural gas pipeline operated by Southern Gas Networks. A map of the HSE consultation zones can be found in Appendix 1 and 2.
5. Therefore, as HSE is a statutory consultee for certain developments located within the consultation distance of major hazard sites and major accident hazard pipelines, we consider that under the Town and Country Planning (Development Management Procedure) (England) Order 2015 HSE's Land Use Planning advice team should have been consulted on these planning applications. Our role in the planning system is to provide local planning authorities with advice on the risks to people at a new development from a major accident at a site in the vicinity storing or using hazardous chemicals, or at a major accident hazard pipeline.
6. Major hazard sites/pipelines are subject to the requirements of the Health and Safety at Work etc Act 1974, which specifically includes provisions for the protection of the public. However, the possibility remains that a major accident could occur at an installation and that this could have serious consequences for people in the vicinity. Although the likelihood of a major accident occurring is small, it is felt prudent for planning purposes to consider the risks to people in the vicinity of the hazardous installation. Where hazardous

substances consent has been granted by the hazardous substances authority, then the maximum quantity of hazardous substance that is permitted to be on site is used as the basis of HSE's assessment – see para 068 of the Planning Practice Guidance on hazardous substances <http://www.gov.uk/guidance/hazardous-substances>

### **Status of the hazardous substances consent and consultation zones for Worcester Park Gas Holder Station**

7. HSE understands that although the hazardous substance consent for the Gas Holder Station is still in force, the installation itself has been decommissioned. We note that paragraph 074 of the Planning Practice Guidance on Hazardous Substances (<https://www.gov.uk/guidance/hazardous-substances#After-consent-has-been-granted>) encourages hazardous substances authorities to be proactive about revoking consents in such circumstances. HSE wrote to Kingston Upon Thames as the Hazardous Substances Authority (HSA) on 13/03/2015, stating that HSE had received correspondence from the site operator, Southern Gas Networks (SGN) Plc. SGN informed HSE that Worcester Park Gasholder Station no longer held certain hazardous substances covered by the regulations or may no longer be holding quantities sufficient to require Hazardous Substance Consent (HSC). HSE suggested in the letter that the HSA may wish to contact the consent holder and try to get the consent revoked. This would result in the consultation zones for the gasholder being removed. To date HSE has not received anything further from the Council.
8. However, HSE received a letter from SGN on 7<sup>th</sup> July 2026 stating that they had formally written to Kingston Upon Thames Council on 3<sup>rd</sup> July 2026, to request they revoke the HSC for the Worcester Park Gasholder Station.
9. In summary if the HSC for Southern Gas Networks Plc, Worcester Park Gasholder Station were revoked the HSE consultation zones for the gasholder would be removed. The HSE consultation zones for the major accident hazard pipeline would remain.

### **HSE's LUP methodology**

10. This consultation has been considered using HSE's Land Use Planning Methodology (see <http://www.hse.gov.uk/landuseplanning/methodology.pdf>), taking account of the above major accident hazard site and pipeline in order to determine HSE's advice.

### **HSE's LUP advice taking account of the consultation zones for the gasholder Station and the MAHP**

11. The following advice considers both the HSE consultation zones for the gasholder and for the MAHP. (See Appendix 3 for a map showing the HSE consultation zones overlaid over the Proposed Site Plan).
12. As shown in Appendix 3 the majority of the red site line boundary is located in the inner consultation zone of the gasholder and the outer consultation zone of the pipeline.
13. HSE would not advise against the landscaping aspect as long as there is nothing to encourage the public to congregate i.e. picnic benches or wooden trails.
14. The housing, play spaces and public gardens aspects of the illustrative master plan are all located in the inner consultation zone of the gasholder. HSE would **advise against** these types of developments located in the inner consultation zone.
15. In summary HSE considers that based on the extant hazardous substances consent there are sufficient reasons for advising against the granting of planning permission for application.

**HSE's LUP advice if the hazardous substance consent for Gas Holder Station was revoked**

16. If the hazardous substances consent(s) for the Gas Holder Station were formally revoked in accordance with Section 14 or 17 of the Planning (Hazardous Substances) Act 1990, the consultation zones for the gas holder (Appendix 1) would be removed and the proposed development site would then only be in the consultation zones for the high pressure gas pipeline. The following advice therefore only considers the HSE consultation zones for the MAHP.
17. The residential areas (blocks C, D, E and partially B) of the development are situated in the outer consultation zone of the pipeline. HSE would not advise against housing located in the outer consultation zone. The other part of block B and block A fall outside of the HSE consultation zone. HSE does not comment on developments outside of the consultation zones.
18. The play spaces and public gardens are located in the outer HSE consultation zone of the pipeline. HSE would not advise against this part of the development.
19. Therefore, applying HSE's LUP methodology to this situation, HSE's objection to the planning application would be removed.

20. In summary, HSE would **not advise against** the planning applications if the following Grampian condition were included in the planning permissions:

“Prior to commencement of development (not including demolition) all the hazardous substances consents which apply to the Gas Holder Station are revoked by the relevant hazardous substances authorities in accordance with Section 17(1) of the Planning (Hazardous Substances) Act 1990.

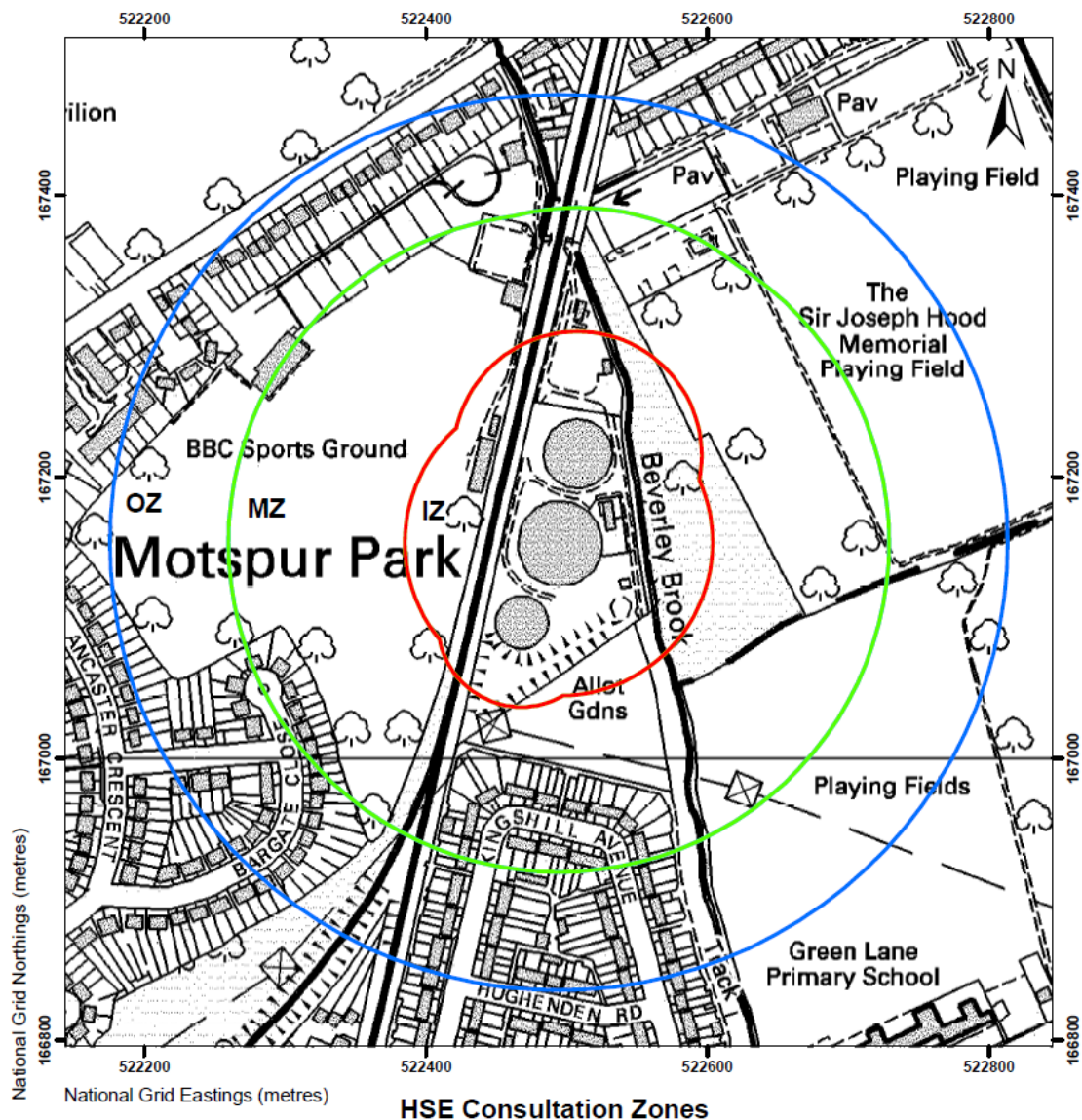
Reason: In the interests of health and safety, it is necessary to ensure that the Gas Holder Site with consent to hold hazardous chemicals under the Planning (Hazardous Substances) Act 1990 will not present a risk to safety.”

21. If the planning authority is minded to grant permission without this or an equivalent planning condition, attention is drawn to Section 9, paragraph 072 of the online Planning Practice Guidance on Hazardous Substances - Handling development proposals around hazardous installations, published by the Ministry of Housing, Communities and Local Government. This requires a local planning authority to **give HSE advance notice** when it is minded to grant planning permission against HSE’s advice, and **allow 21 days from that notice** for HSE to consider whether to request that the Secretary of State for the Housing, Communities and Local Government, call-in the application for their own determination.

22. The advance notice should be sent by email to [lupenquiries@hse.gov.uk](mailto:lupenquiries@hse.gov.uk), marked with high importance and ‘minded to grant’ in the subject heading.

Yours sincerely,  
Berdine Clews  
**Statutory and Commercial Land Use Planning Advice**

## Appendix 1: Consultation zones for H1734 Worcester Park Gasholder Station



Southern Gas Networks Plc

HSE HID CI5 Ref: H1734  
Grid Ref: TQ 224 671

Prepared - March 2015  
This map supersedes all previous or undated maps

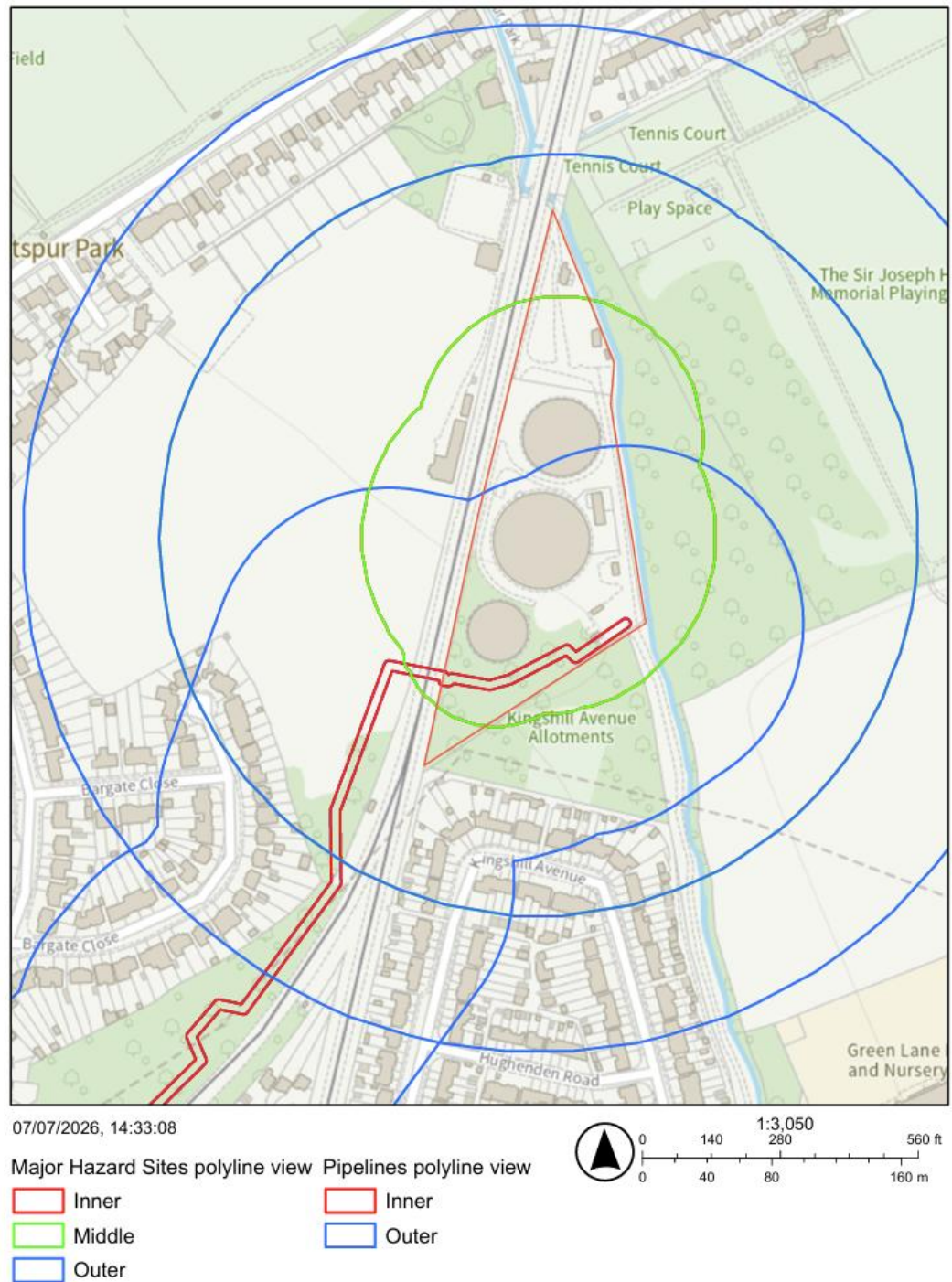
IZ = Inner Zone  
MZ = Middle Zone  
OZ = Outer Zone

0 50 100 200 Metres

© Crown copyright and database rights 2015, Ordnance Survey 100021025

## Appendix 2 – HSE consultation zones for the gas holder site and major hazard pipeline

### Official-Sensitive HSE Consultation Zone Mapper



© Crown copyright and database rights 2026 (Health and Safety Executive; Ordnance Survey AC0000808970); © Bluesky International Ltd and Getmapping Plc 2026.

### Appendix 3 - Georeferenced plan with Gasholder and MAHP Consultation Zones

