

Motspur Park Gasholders

In the London Borough of

Planning Application reference: GLA/2026/0208/S3 & GLA/2026/0209/S3

This addendum sets out various factual updates, clarifications and corrections which need to be considered in conjunction with the Representation Hearing Report originally dated 21 July 2026.

Clarifications and additional information to the report

Paragraph /Section	Proposed Amendment / Correction	Comment
Hearing		
para 3b / page 2	...The proposed development would not cause substantial harm to the openness of the MOL by way of its design, layout, orientation and scale...	Updated to correctly reference the MOL policy test
para 3g page 3	<i>"GLA officers have identified some no material neighbourhood amenity impacts, including no loss of daylight, sunlight, and overshadowing, largely due to the significant separation distances between the nearest existing and the proposed residential dwellings"</i>	Updated to reflect submitted information
para 7 / page 7	The site registers a Public Transport Accessibility Level ('PTAL') score of 0- 1b 2, on a scale of 0-6b, where 6b is the highest....	Clarification.
para 9 / page 7	Beverley Brook flows north to south south to north within the eastern boundary of the site...	Updated to confirm the correct flow direction
para 13 / page 10	...with heights between 8 and 16 storeys (52m AOD). The proposed development ...	Clarification.
para 75 / page 22	Main representation provided to Kingston as the site is mostly located within the Royal Borough of Kingston upon Thames.: The below-ground archaeological potential is low Recommend that the gas holder station is identified as a non-designated heritage asset of historical and industrial archaeological interest. A condition for further recording is not necessary as this has been undertaken.	The GLAAS comments are not summarised earlier in the report – summary has been added

	We recommend a public benefit condition be attached to planning permission if granted	
para 115 / page 29	... GLA officers consider that the current form of the site limits the current value of the site and consider it does not contribute to a Green Chain in this location. It is noted that as part of the RBK draft Local Plan preparation an updated MOL Study (January 2026) has been prepared. The Regulation 19 draft Local Plan proposes to remove the main part of the Motspur Park Gas Holders site from the MOL and that proposes that it is allocated for residential development.	The first sentence references The Kingston Green Belt and MOL Assessment (2018). Reference should be added to the Regulation 19 consultation which includes an updated MOL Study (January 2026).
para 118 / page 29	GLA officers..., and it would not cause substantial harm to the openness of the Green Belt MOL. Where proposals...	Updated to reference MOL
para 180 / page 41	The proposal comprises five buildings with heights up to 16 storeys (maximum 52m AOD) as shown in Table 4 below.	Clarification.
para 184 / page 42	...The site is not within an area identified as appropriate for tall buildings in the Local Plan and therefore the proposal conflicts Since the RBK March 2026 planning committee, RBK has published its Regulation 19 Local Plan which identifies the site as being a suitable location for tall buildings. This is however not adopted policy. Notwithstanding this, GLA officers consider that a design-led optimisation of an existing brownfield site in a sustainable location is capable of outweighing this adopted policy conflict. with Policy D9 Part B of the London Plan. This is further discussed below.	Updated to reference the RBK Regulation 19 Draft Local Plan.
After para 194 / page 45	In response to the Royal Park's consultation letter to LB Merton advising that views from Bushey Park and Richmond Park should be considered, Montagu Evans (on behalf of the applicant) submitted a letter containing additional information to LB Merton (12.12.26). The additional information confirmed: - no intervisibility with the proposed development and Bushey Park. - no intervisibility with the proposed development in any of the views from Richmond Park. The only exception is View 02 from Beverley Brook Bridge	Additional information added to confirm that the Royal Parks comments noted in paragraph 65 of the GLA report have been addressed. It is suggested that this is inserted after para 194.

	where when the trees are 'switched off' in VUCity. In this view the proposals appear faintly on the distant horizon line. The density of vegetation and the significant separating distance indicate that the Proposals would not be visible from this location, even in winter. The applicant considered that the visual information provided is sufficient, and AVR's were not considered necessary. The GLA agrees with this position.	
para 195 / page 46	...appropriate massing a , and high-quality materials...	Typo corrected
Para 204 / page 47	A condition is secured regarding submission of further details of all external materials and finishes, including brick types, window reveals and render windows...	Typo
para 207 / page 47	... At consultation stage, it was noted by GLA officers that only 43.3% of the units were dual aspect, since amendments have seen an increase to 79% of units being dual aspect or enhanced single aspect , which is supported.	Updated to reflect submitted scheme
para 208 / page 47	<i>"208. In terms of internal daylight, the overall compliance rate is 81% 94% of all habitable rooms and 95% 92% of all Living/Dining Kitchens will meet the BRE guidance, which is a high level of compliance for this type of development.</i>	Updated to reflect submitted information
para 209 / page 47	<i>209. Block E will have the lowest level of compliance, with 57.7% 70% of habitable rooms meeting the suggested daylight levels. However, this is considered acceptable given the high density of the scheme. It is also noted that all residents will have access to a mix of private and communal amenity spaces. Considering the overall quality of the accommodation provided by the proposed development, this is considered to be acceptable on balance."</i>	Updated to reflect submitted information
para 212 / page 48	All of the proposed homes would be provided with private amenity space. and will meet London Plan Policy D6 requirements of 5 sqm for a 1-2 bedroom home, with an additional 1 sqm per additional occupant. Balconies are all 6m ² , exceeding the London	Updated to reflect submitted scheme

	Plan Policy D6 requirement for 1 beds, but under the requirement for 2B4P & 3 beds. Kingston has a greater requirement of 10 sqm and 1 sqm per additional occupant under Policy Guidance 12 (PG13) of the Residential Design SPD. The proposal would provide a total of 4,075 sqm of private amenity space, while PG13 requires 7,665 sqm. This will result in a shortfall of 3,640 sqm (including 50sqm additional requirement under Kingston local policy). The shortfall is provided as communal amenity space.	
para 214 / page 48	The dedicated total communal amenity space has accordingly been provided as 3,640 sqm. Therefore, the proposed development includes a total of 6,474 sqm 5,911 sqm of landscaping and public realm provision (excluding play space), as well as 256 sqm of internal amenity space known as the 'clubhouse'.	Areas corrected
Para 246, 247 and 249 and first sentence of para 250 / page 53	[Move to form part of the Residential Quality section at paras 208-209]	Text in wrong section of report
para 250 / page 53	"Overall, the level of compliance achieved across the site for daylight and sunlight is considered high and is comparable to other forms of high density development. The scale of the site and separation distances, combined with the layout of the buildings, assist in mitigating the most severe impacts. Further impacts compared to the existing conditions are to be expected, however based on the assessment provided with the application, would result in the amount of additional overshadowing on existing residential gardens remaining largely unchanged is not considered to be significant. GLA officers conclude that the proposed development would be acceptable in regard to daylight, sunlight and overshadowing and satisfies the requirements of Policy DM10 of the Kingston Core Strategy and Policy D6 of the London Plan."	Updated to align with submitted information
para 280 / page 58	The trees that have been identified to be removed are T19 (Category B), T1, T2,	Correction of typo (T13 not T3)

	T3 T13 and T20 (Category C) and Tree Groups G3, G8 and G12 (Category C).	
para 281 / page 58	The proposal will include extensive landscaping and will deliver 234 213 new trees ...	Typo corrected on new trees to be planted
para 283 / page 58/59	“The report identifies the overall gain would be 25. 32 %, which significantly exceeds the statutory requirement of 10% under the Environment Act 2021. It is recognised that some metrics fall marginally below their requirements due to the loss of 1.99 units of neutral grassland including 3.02 units of Neutral Grassland and 0.59 units of Bramble Scrub, and this will need to be provided off-site. BNG and its management (onsite and offsite) is secured by condition/s106, which has been secured by condition, and its management will be secured through the S106 agreement. Additionally, conditions have been secured, including further details of the ecological enhancements and management plans.	Figures updated to align with BNG report.
para 288 / page 59	The Screening Note concluded that the proposed development will not unacceptably compromise the conservation objectives of Habitats sites and therefore there will be no adverse effect on site integrity.	Typo corrected
para 311 / page 63	The Sustainable Drainage System Strategy included details of the proposed SUDS measures to be implemented through the scheme, including rainwater butts, permeable block paving, bespoke rain gardens and geocellular storage. It is also proposed that 167 cubic metres of attenuation will be introduced in order to improve water quality and significantly reduce the runoff rate from the site.	Clarification provided
para 339 / page 67	...A contiguous segregated pedestrian footpath would be maintained for the full length of the access road with full public access; The southern entrance into the Site is proposed as a shared surface with pedestrian and cyclist priority. Circa 20m north of Kingshill Avenue, a 2m-wide continuous pedestrian footway is then proposed on eastern side of the access road carriageway. This will be secured via the Section 106 and be fully open to public access	Adjusted to reflect the pedestrian proposals at Kingshill Avenue correctly and to include the raised table.
para 361 / page 71/	17 deliveries are predicted per hour not 16.	Clarification.

para 382 / page 74	As regards to the Community Infrastructure Levy ('CIL') considerations, Mayoral CIL payments and Kingston and Merton CIL payments are expected to be made in association with this development.	Clarification.
Comments		
para 95/page 23	Since Stage 1, the Mayor has received 833 representations, with 819 in objection. At the time of writing, a total of 569 578 responses were received through the GLA's PlanApps website for both applications since 7 April, when the Mayor took over as the local planning authority. 280 285 responses were received for 2026/0208 (Kingston), of which 278 objected to the application and 2 were in support, and the remaining neutral. 289 293 responses were received for 2026/0209 (Merton), of which 287 291 objected to the application and 2 were in support.	Update.
	Further representations have been received by the Mayor following the publishing of the report. The representations raise matters previously raised by objectors and therefore have been addressed in the Hearing Report.	Update.
	SERAK have provided further comments and reiterated their submission on behalf of more than 115 households.	While this representation was not individually summarised in the hearing report it was considered by GLA officers.
Planning Policy		
Para 41/page 18	The Draft London Plan was published on 16 July 2026 and is now a material consideration. The Plan has been given the afforded appropriate weight given it is in draft form. The conclusions contained in the hearing report remain unchanged.	Update.
Para 41/page 18	The 'publication document' for Regulation 19 was approved on 16 June 2026 for the Draft Kingston Local Plan and is also a material consideration. The Plan has been given the afforded appropriate weight given it is in draft form. The conclusions contained in the hearing report remain unchanged.	Update.

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