

PLANNING APPLICATIONS COMMITTEE

19 March 2026

CASE OFFICER REPORT

APPLICATION NO: 24/P2859

DATE VALID: 13/11/2025

Site Address: Motspur Park Gas Holders, SW of West Barnes Lane,
London, KT3 6NQ

Ward: West Barnes

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 ACCESSSES 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.

Drawing Nos: See condition 2

Contact Officer: Tim Lipscomb

RECOMMENDATION

Grant Permission Subject to Section 106 legal agreement and conditions and stage 2 referral to the GLA (relating to the wider application).

s.106 Heads of Terms:

- Financial contribution towards playspace improvement at SJHMPF - £400K
- Financial contribution towards investigation, consultation and potential implementation of a Controlled Parking Zone within the London Borough of Merton. (£50K)
- Financial contribution for the implementation of a pedestrian crossing over West Barnes Lane (£100K)
- Financial contribution for the implementation of pedestrian and cycle facilities, potentially to include a cycle contra-flow lane on Station Road and/or additional cycle parking at Motspur Park station and/or Prioritisation of cycle infrastructure along West Barnes Lane - £100K
- £75K towards highways repairs on West Barnes Lane.

CHECKLIST INFORMATION

- Is an Environmental Statement required: Yes
- Has an Environmental Impact Assessment been submitted: yes
- Press notice: Yes
- Site notice: Yes
- Design Review Panel consulted: Yes (within RBK)
- Number of neighbours consulted: 291
- External consultations: TfL, Network Rail, Thames Water, Environment Agency, Historic England GLAAS, HSE, NHS – London Healthy Urban Development Unit, MET Police, MET Police – secured by design, Civil Aviation Authority, Natural England, The Canal & River Trust, UK Power Networks, NHS England, National Grid, National Grid, Metropolitan Police, HSE, Sport England, London Fire and Civil Defence Authority, London Borough of Sutton & Royal Borough of Kingston.

1. Introduction

- 1.1 This application has been brought before the Planning Applications Committee (“PAC”) due to the nature and scale of the proposed development. The application is a ‘cross-boundary’ application with the majority of the proposed development within the Royal Borough of Kingston (RBK), with one of the two site accesses to be located within Merton. The RBK reference for the wider residential development planning application is 25/P02562/FUL.
- 1.2 Due to the scale of the development, the application requires referral to the GLA (under the provisions of The Town & Country Planning (Mayor

of London) Order 2008, this application is referable to the Mayor of London under the following categories of the Schedule to the Order 2008:

Category 1A “Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.”

- 1.3 In the Stage 1 Report from the GLA, issued to the Council on 1st December 2025, the Councils (Merton and the Royal Borough of Kingston – RBK) have been instructed to refer the application back to the Mayor (post resolution to determine) for the decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.
- 1.4 The GLA referral process gives the Mayor six weeks to provide comments on the application, assessing whether it complies with the London Plan policies. This is a consultation response known as stage one. The application is then considered by the local planning authority at its planning committee, where it decides whether to grant or refuse permission. Following its consideration, the local planning authority is then required to refer the application to the Mayor for his final decision, known as a Stage 2 referral. The Mayor has 14 days to make a decision to allow the local planning authority decision to stand, to direct refusal, or to take over the application, thus becoming the local planning authority.
- 1.5 The cross-boundary application assessment process would require Merton to assess the development proposed within Merton and to issue a decision notice based on that element of the development, whilst considering the wider development proposed. However, comments in relation to the remainder of the scheme would be made for consideration by RBK.
2. **Site and surroundings**
 - 2.1 The wider Site is located between Motspur Park and Worcester Park, principally within the Royal Borough of Kingston (RBK) administrative area, adjacent to its eastern boundary with the LB Merton (‘LBM’) (to the north) and LB Sutton (‘LBS’) (to the south).
 - 2.2 The wider Site is accessed from 2 points: West Barnes Lane (in LBM) crosses the northern access route, close to Motspur Park railway station; and Kingshill Avenue (RBK) crosses to the south and on to Green Lane (LBS). The Site has a Public Transport Accessibility Level (‘PTAL’) score of 0-1b.
 - 2.3 The wider 2.97ha site is occupied by three redundant gas holders, with height of 59m, 49m and 26m and areas of hardstanding.
 - 2.4 The Site is contained by:

- the Railway line to Central London along its western boundary, adjacent to which lies the Fulham Football Club training ground;
- the Beverley Brook along its eastern boundary, adjacent to which lies the Sir Joseph Hood Memorial Playing Fields ('SJHMPF')
- a 'Site of Importance for Nature Conservation' ('SINC') adjoins to the south, beyond which lies allotments, and existing residential properties in Kingshill avenue; and
- to the north, adjacent to the northern access route lies existing residential properties in Marina Avenue, West Barnes Lane and Motspur Park.

2.5 To the north and the south of the Site, the surrounding context is dominated by two and three storey residential development, typical of a London Suburb.

2.5 To the north, the Site is accessed via West Barnes Lane, a single carriageway road, subject to a 20 mph speed limit, and extends on a northeast axis to the north of the Site. The entrance sits opposite Station Road and the railway station. There is a level crossing over the railway to the immediate north of the site on West Barnes Lane.

The Site currently has access from both the existing northern and southern accesses; both of these accesses are gated, and the Site is not open to the public

2.6 The site, the part of the site with RBK, is designated as:

- Metropolitan Open Land (MOL)
- Green Chain
- Green Corridor
- Site of Importance for Nature Conservation (SINC)
- Partially within Flood Zone 2/3
- Critical Drainage Area
- Archaeological Priority Area – Tier 2

2.7 There are a number of trees on site, mainly to the peripheries of the site and a wooded area to the south, along with an allotment area to the south of the site.

2.8 There is an electricity pylon to the south of the site (which would be removed as part of the proposals).

2.9 The site has been used as a gasholders since 1924 and the use as a gas holders ceased in 2007.

2.10 The buildings within the immediate context of the site are predominantly 2 storeys with pitched roofs, with some taller buildings further to the north.

2.11 To the north of the site is Blossom Lower School & Upper House.

Site description relevant to this Merton application:

2.12 The smaller application site that relates to the Merton planning application, is 0.14ha in area and comprises the existing access path from West Barnes Lane to the gas holders. The path is laid to hardstanding and allows for vehicular access. The route is gated and not accessible to the public. The route is relatively flat, with levels ranging from 16.2m to 16.5m (above Ordnance Survey Datum).

2.13 The site, the part of the site within Merton, is designated as:

- Partially Flood Zone 2, 3a and 3b.
- Area at risk of groundwater flooding and a critical drainage area (with incidents of surface water flooding recorded in the nearby Marina Avenue)
- Green Corridor

2.14 The Site also lies near the:

- Green Corridor - Sir Joseph Hood Memorial Playing Field (SJHMPF) land (within LBM)
- Sir Joseph Hood Local Nature Reserve ('LNR') and SINC, on the eastern boundary and partially on the western boundary (within LBM); and
- MOL to the east at the SJHMPF
- Designated Open Space to the east at the SJHMPF
- Manor Park SINC, 100m to the southwest (within RBK).
- Adjacent to railway line

2.15 The site is not within a Controlled Parking Zone (CPZ).

2.16 The site is not within a Conservation Area and there are no listed buildings, locally listed buildings or Scheduled Monuments on or near the site.

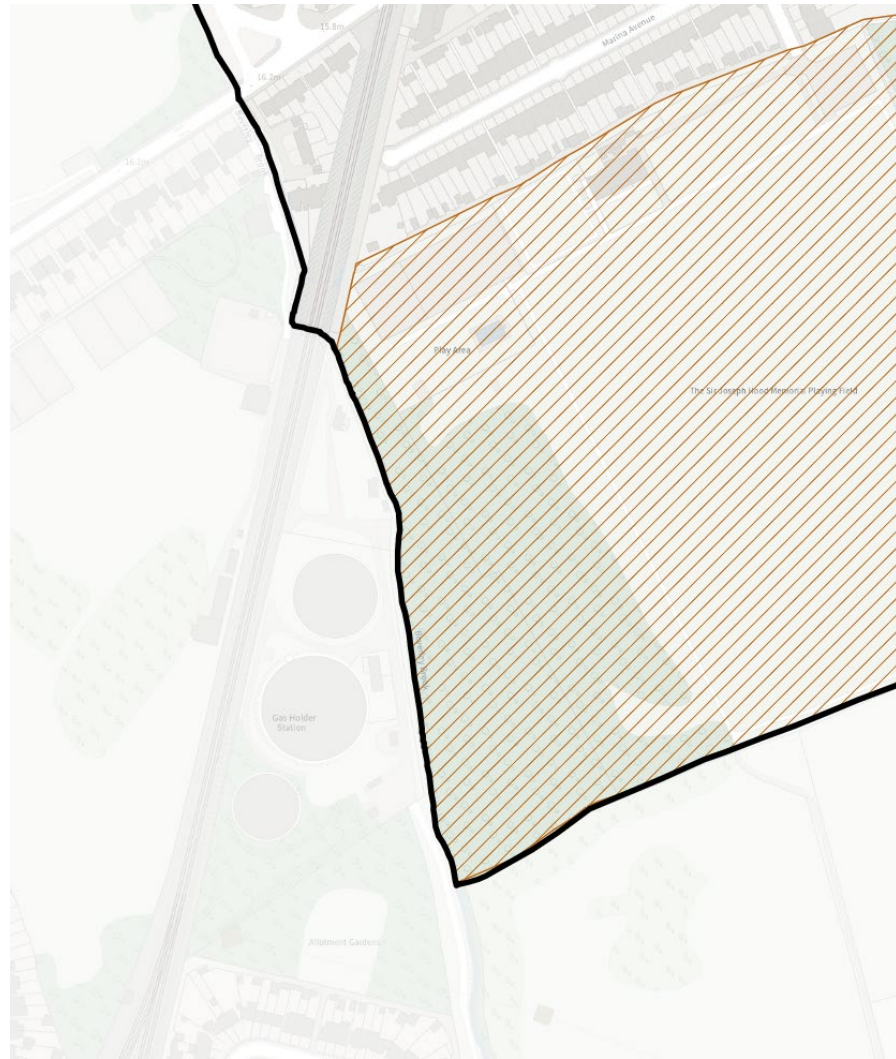
LNR (within Merton):



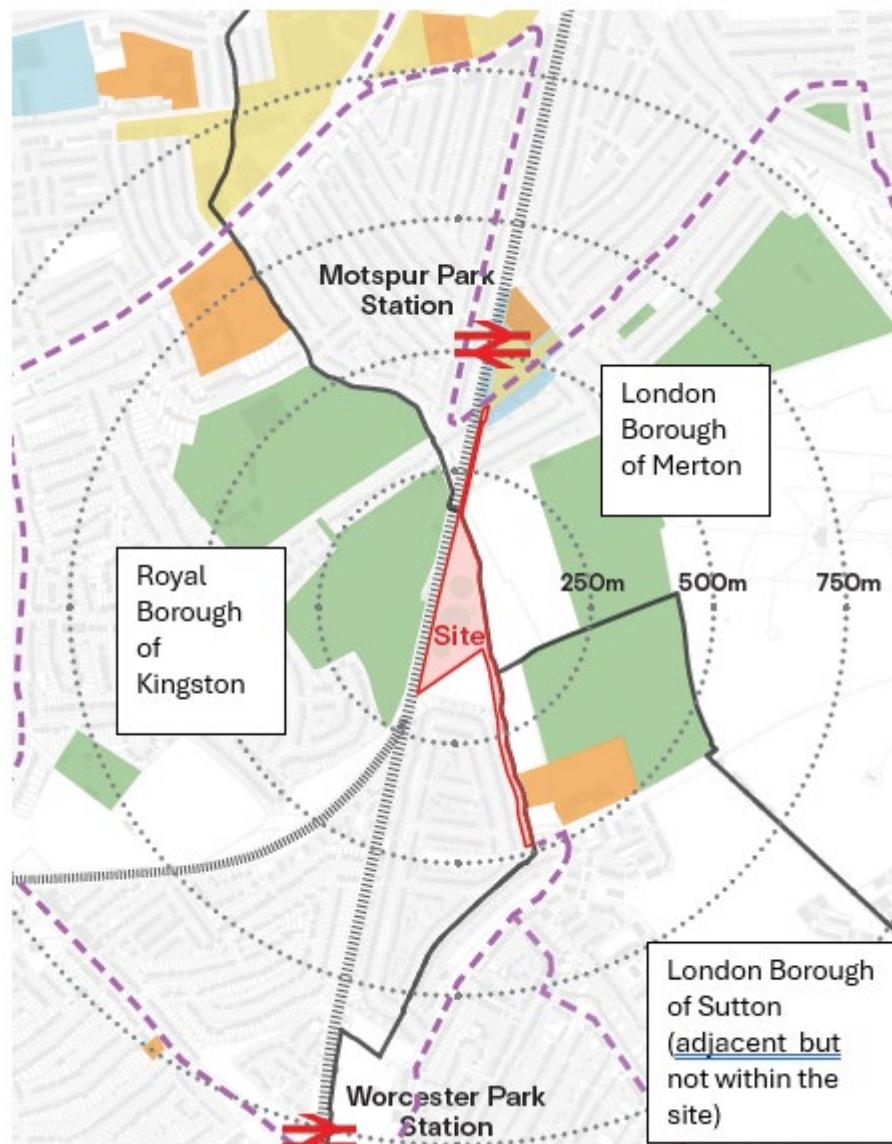
SINC (within Merton):



MOL (within Merton):



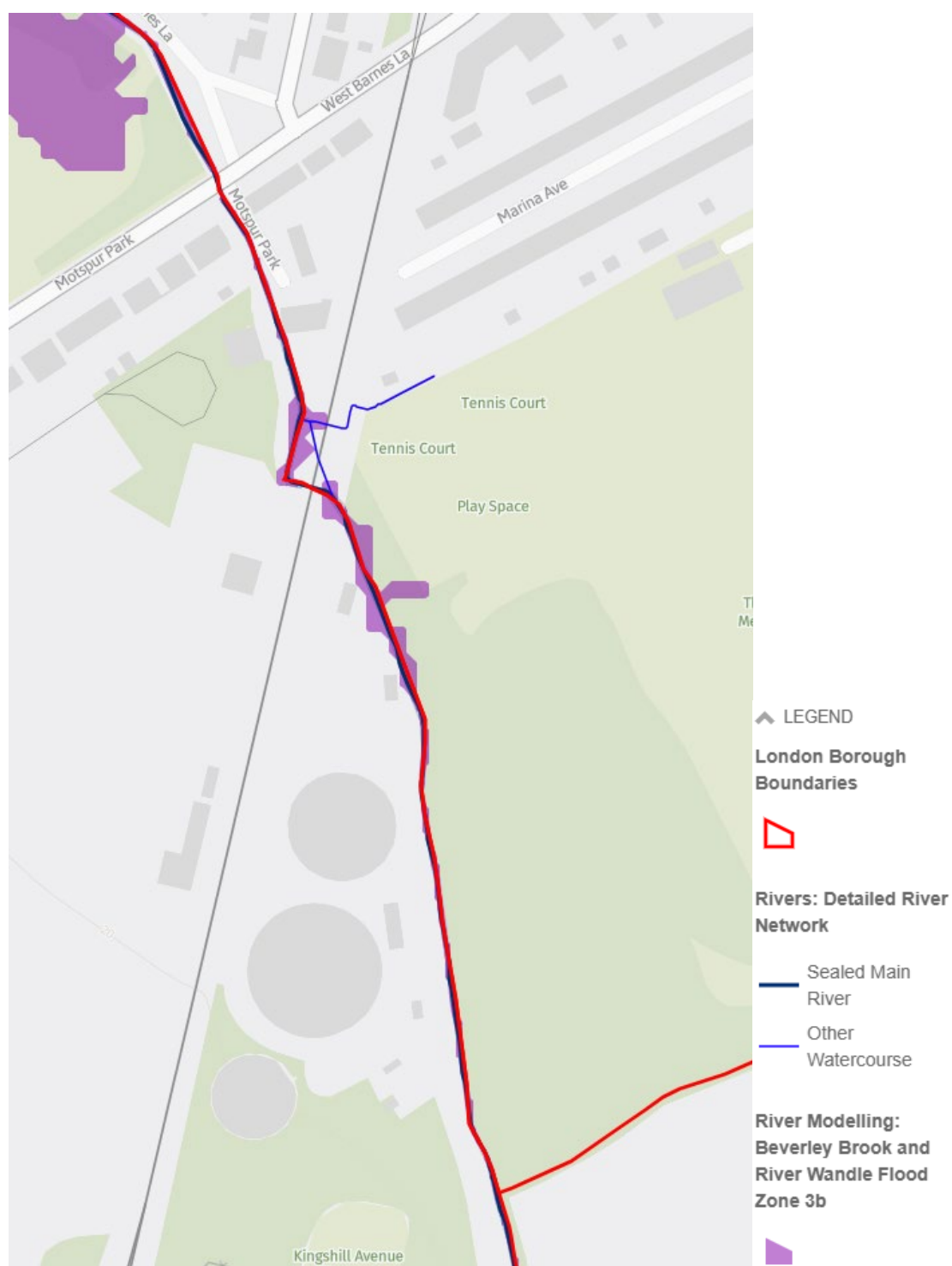
Site location showing position of neighbouring boroughs:



Flood Zones 2 and 3:



Flood Zone 3b (Merton Strategic Flood Risk Assessment):



Critical Drainage Area:



2.17 The applicant indicates that there are a number of additional site constraints:

- an offset (no build zone) adjacent to the railway line
- an offset (no build zone) adjacent to Beverley Brook
- below ground gas infrastructure pipes, which will be retained and are subject to an easement zone
- operational SGN gas infrastructure which will be retained

3. Current Proposal

3.1 The wider planning application, being determined by RBK, seeks full planning permission for the demolition of all existing structures, including the gas holders and phased redevelopment of the site with five flatted blocks, accommodating a total of 586 new homes (ranging in size from 1 to 3 bedrooms) (a density of 207 dwellings per hectare).

In addition to the five residential blocks, a ‘Club House’ (ancillary residential use) or ‘Amenity Hub’ is proposed.

The heights of the blocks are as follows:

- Block A – 52 metres
- Block B – 42.3 metres
- Block C – 48.9 metres
- Block D – 39.2 metres
- Block E – 26.9 metres

3.2 10% of units are proposed to be wheelchair accessible homes (M4(3)(2a) or M4(3(2b))), with the remainder proposed as M4(2).

3.3 The accommodation schedule (including affordable housing), is below:

The proposed development will deliver 586 new homes. Table 1 below provides a breakdown of the proposed quantum of homes, split between the five blocks:

Table 3.1 Proposed no. of homes and tenure per block

Tenure	Number of homes					Total
	Block A	Block B	Block C	Block D	Block E	
Affordable Intermediate	0	60	26	16	0	102
Affordable Rent	0	0	0	72	0	72
Private	156	63	116	0	77	412
Total	156	123	142	88	77	586

Source: Maccleanor Lavington.

The proposed size mix is:

Table 3.2 Proposed unit mix by tenure (%) (rounded)

Unit type	Private Sale (%)	Affordable Intermediate (%)	Affordable Rent (%)	Total (%)
Studio	40 (10%)	0	0	40 (7%)
1 Bed	153 (37%)	34 (33%)	7 (10%)	194 (33%)
2 Bed	194 (47%)	69 (67%)	29 (40%)	292 (50%)
3 Bed	24 (6%)	0	36 (50%)	60 (10%)

Source: Maccleanor Lavington.

The housing mix is:

Unit	No.	%	Summary
1B/1P	40	6.8%	1 bed 40%
1B/2P	194	33.1%	
2B/3P	99	16.9%	2 bed 50%
2B/4P	193	32.9%	
3B/5P	52	8.9%	3 bed 10%
3B/6P	8	1.4%	

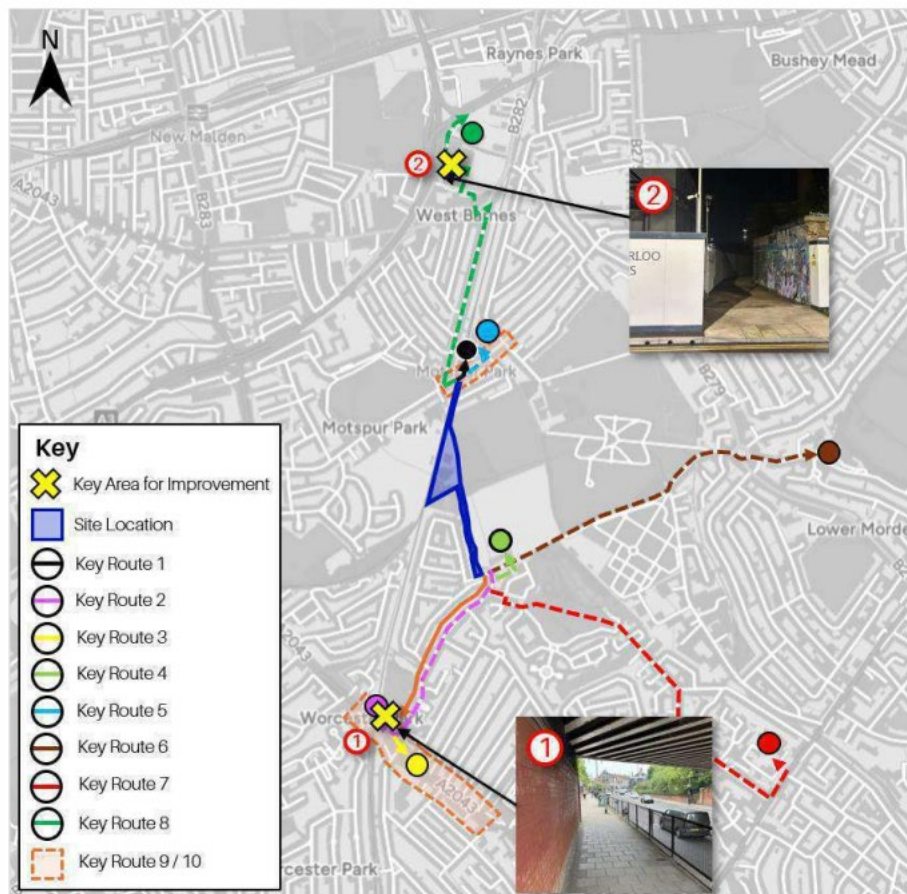
- 3.4 A north-south pedestrian and cycle route will extend along the eastern boundary of the site, adjacent to the Beverley Brook.
- 3.5 Car parking would be focused towards the western part of the site. A total of 89 residential parking spaces are included within the proposed development. This equates to a parking ratio of 0.15. 18 of these 89 spaces are blue badge spaces.
- 3.6 In terms of cycle parking, 1,035 long-stay cycle parking spaces for residents and 28 short-stay cycle parking spaces for visitors are proposed.
- 3.7 The pallet of materials would include comprising 3 buff brick tones, glazed bricks and metalwork finishes.
- 3.8 The proposed development includes over 1.6 acres of new public realm, including play facilities for infants to 17 years, and offsite enhancements to the SJHMPF play areas.
- 3.9 The proposed apartments will have access to either a private terrace, or balcony (6 sqm per dwelling). In addition, residential communal gardens are proposed across the masterplan. The ground floor units will benefit from 152 sqm of private terraces, which are separated from the public realm through fencing and intentional planting. Across the Site, the scheme benefits from 3,640 sqm of communal amenity, in the form of communal gardens and landscaped spaces, largely within proximity of the residential blocks. There is an additional, internal amenity space for the use of residents in the form of a 'clubhouse' of 252 sqm).
- 3.10 The applicant estimates, from the GLA child yield calculator, that 240 children will live within the proposed development, there is therefore a need for 2,400 sqm of play space on the Site. Play space for 0-11 years will be delivered on site, whilst play spaces for ages 11-17 are proposed off site, in the form of improvements to the Sir Joseph Hood Memorial Playing Fields. The breakdown of play space provided for each age range, is as follows:
- 0-4 years: 1,174 sqm on site
 - 5-11 years: 469 sqm on site
 - 12-15 years: 351 sqm delivered off site
 - 16-17 years: 407 sqm delivered off site
- 3.11 The proposed southern access road will serve as the sole vehicular access into and out of the Site, from Kingshill Avenue.
- 3.12 The applicant has submitted an energy statement which concludes that the scheme would achieve a 77% improvement over Part L1A 2021 of the Building Regulations.

- 3.13 The proposed development would deliver 35 per cent affordable housing (by habitable room), comprising 50% affordable rent and 50% shared ownership (174 affordable homes overall), despite a Financial Viability Assessment which asserts that even with 0% affordable housing, the scheme would remain unviable.
- 3.14 The submission sets out that the scheme would achieve an Urban Greening Score of 0.533.
- 3.15 The scheme includes works to the Beverley Brook, which would involve regrading the bank. (These works are within RBK).
- 3.16 The landscape proposals would deliver a 34% gain in biodiversity, with the following measures proposed:
- The existing woodland and SINC to the south will be retained and enhanced;
 - The railway and brook will be retained as green corridors;
 - Adjacent tree lines to the Site boundary will be retained to maintain commuting and foraging routes and a lighting sensitive design delivered;
 - Bird and bat boxes provided to new buildings and retained trees including the 1SP Schwegler Sparrow Terrace, Vivara Pro Seville woodstone nest box and swift bricks such as the Cambridge Swift Nest Box System and 2FN Schwegler bat box or 2FR Schwegler bat tube;
 - Artificial nest suitable for Peregrine Falcons to 1 no.residential building block (at least 20m in height);
 - Wildlife friendly tree, shrub and herbaceous planting including species known to provide fruit, berries and nectar resources for wildlife. This includes both native and non-native species;
 - Provision of bee bricks to enhance the habitat for solitary bee species;
 - Provision of hibernacula for herpetofauna and hedgehogs created by reusing materials on site; and
 - Night scented flowering plants, to encourage foraging bats to use the site, post-development
- 3.17 In terms of trees:
- 40 no. trees will be retained
 - 10 no. trees will be removed
 - 7 no. tree groups will be retained
 - 4 no. tree groups and a part of 1 tree group will be removed
 - 2 no. scrub areas will be retained

The tree planting strategy seeks to replace all trees that require removal, and introduce additional tree planting into the Site. In total, 213 no. new trees will be planted across the development.

- 3.18 SuDS have been incorporated into the landscape design with permeable paving, bioretention basins and swales located throughout.
- 3.19 The masterplan opens up the Site for use by the public and creates a safe and secure brookside walk and a series of amenity spaces that can be used by all.
- 3.20 The Key Routes identified within the Active Travel Zone (ATZ), within Merton are: Key Routes 1, 5, 6, 8, 9/10.

Figure 5-1 ATZ Routes



- **Key Route 1:** Motspur Park Station and adjacent bus stops.
- **Key Route 2:** Worcester Park Station.
- **Key Route 3:** Longfellow Road bus stops.
- **Key Route 4:** Green Lane Primary & Nursery School.
- **Key Route 5:** Blossom House School.
- **Key Route 6:** Morden Park (only assessed as a day time route).
- **Key Route 7:** St. Anthony's Hospital.
- **Key Route 8:** Raynes Park High School.
- **Key Route 9:** Motspur Park High Street.
- **Key Route 10:** Worcester Park High Street.

3.21

Of these key routes, only routes 2 and 8 are identified as needing any improvements.

2: Underpass on northern side of A2043 (railway line crossing the high street at Worcester Park station)

Improvements: Provision of lighting – subject to land/structure ownership

8: Pedestrian footpath east of the B282 Beverley Way

Improvements: Provision of lighting.

Photo 10 – Area for Improvement – Key Route 8 (Daytime ATZ)



Photo 11 – Area for Improvement – Key Route 8 (Night-time ATZ)



3.22 The applicant proposes a new pedestrian crossing over West Barnes Lane to provide a pedestrian link to the rain station.

3.23 The applicant has stated that dedicated space for cycle hire initiative cycle parking will be incorporated.

3.24 The applicant has set out that HGV construction traffic can be restricted to not be within the hours of 07.00-09.00 and 15.00-19.00. (However, as noted below, this would relate to all vehicles over 3.5T).

3.25 Phasing

3.26 The application is submitted on the basis of being a phased development. The planning statement indicates that there would be 5 residential phases of development.

Phase 1. Works to comprise: site clearance/preparation, site investigations, remediation, archaeological investigations, Kingshill Avenue site access & southern road, surface water drainage attenuation (southern section), foul drainage connection, Brook enhancements / naturalisation, and SGN gas works (retained pig trap compound and relocated gas governor)

Phase 2. Block E (including landscape/road works)

Phase 3. Block D (including landscape/road works)

Phase 4. Block C (including landscape/road works)

Phase 5. Block B (including landscape/road works)

Phase 6. Block A (including landscape/road works, and West Barnes Lane site access and northern road)

Proposed development within Merton:

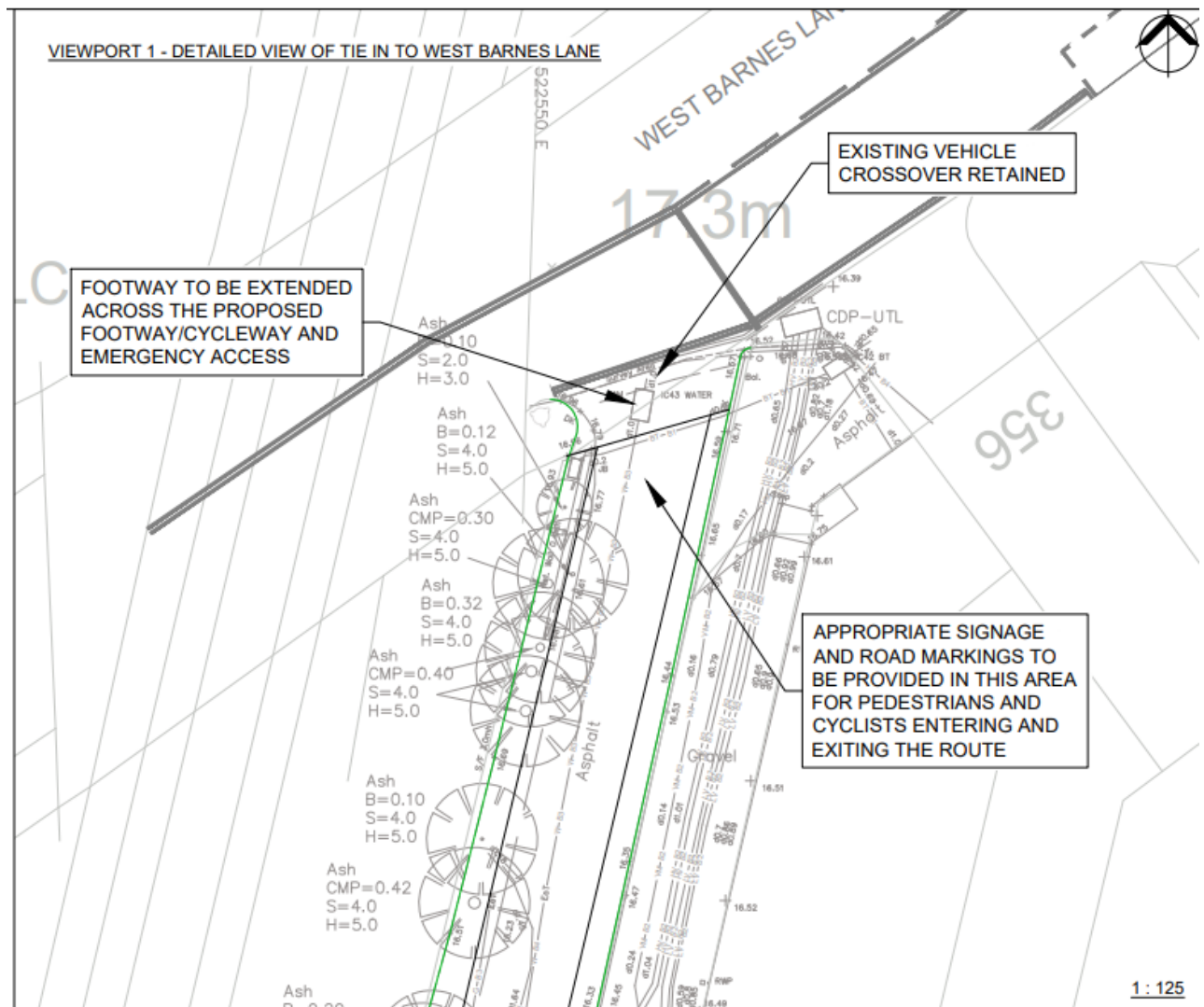
3.27 **The assessment made by Merton in this application relates to the site area within Merton only. The development proposed within Merton is as follows:**

3.28 The applicant has identified various character areas within the site, the area relevant to Merton are the 'Northern Access' and Northern Arrival'.

3.29 The part of the site that is within Merton would form a pedestrian and cycle access to the development, leading to Motspur Park train station. The entrance onto West Barnes Lane is intended to be a feature entrance gateway, constructed from the vertical steel elements of the gasholder structures. This feature gateway includes signage, feature lighting (column mounted luminaires - 3m high along the path and feature uplighting and downlighting to gateway elements) and also incorporates a decorative gate that screens, but also allows access to, the adjacent substation.

3.30 The proposed development retains the access from West Barnes Lane, providing a bell mouth access for pedestrians, cyclists and emergency vehicles. This route would also be used for construction traffic entering the site (which would then leave the site via the southern access).

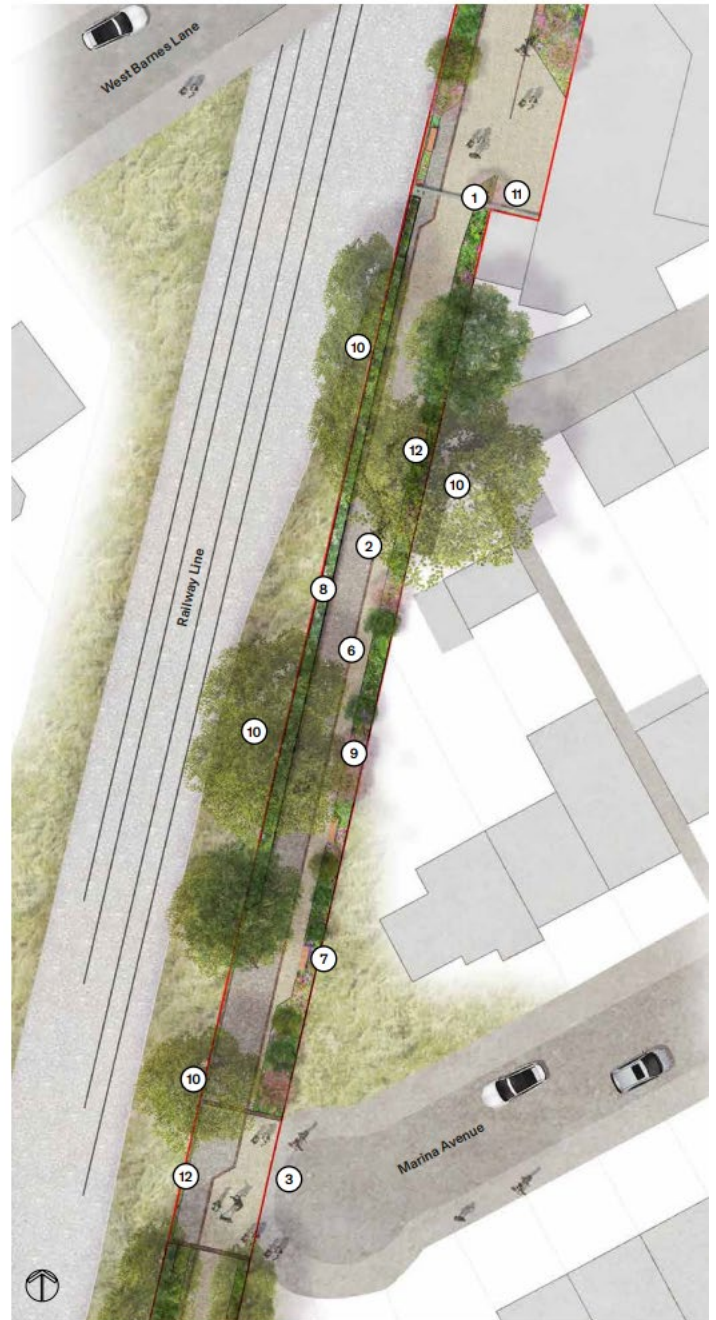
- 3.31 From the northern entrance, access for pedestrians and cyclists will extend south into the rest of the site, four removable bollards are proposed to manage the Site access.
- 3.32 The footway would be extended to cross the proposed access. This would be delineated by a change in surfacing materials - The footway would be a continuation of the existing footway materials delineated on either side by kerbs (small upstand/ 45 degree splay kerb roadside, and flush site-side). The tarmac finish to the northern entrance would then start behind the flush kerb.



- 3.33 The route along the access into the main body of the Site is generally 4m wide to accommodate emergency vehicle access with clear sightlines. Planting either side of the route is low to maintain visibility. This width reduces to 3.5m at points along the route.
- 3.34 The northern access route includes a pedestrian/cycle entrance at the end of Marina Avenue and another route into the adjacent Playing Fields.

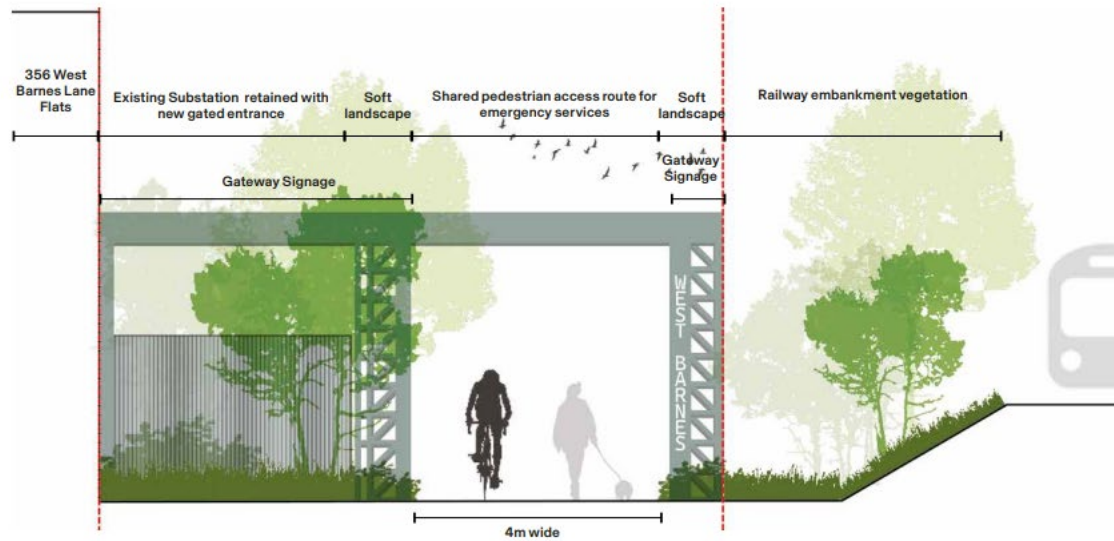


Plan of the Whole of the Northern Access

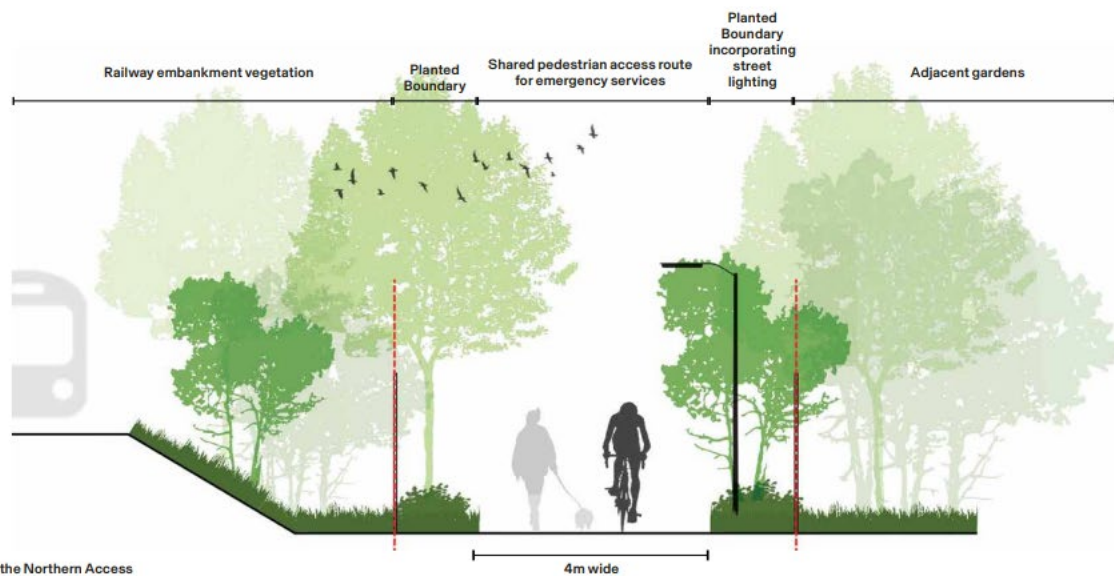


Detailed Plan of Part of the Northern Access

- | | |
|---|--|
| 1 Feature entrance gateway | places to rest and spend time |
| 2 4m wide access route to accommodate emergency vehicle access | 8 Hedge planting and climbing plants to screen the railway boundary treatment |
| 3 New proposed pedestrian connection with Marina Avenue | 9 Low level shrub and herbaceous planting to maintain clear sightlines along the route |
| 4 Northern Arrival | 10 Existing trees outside the red line boundary retained |
| 5 New proposed pedestrian access into Sir Joseph Hood Memorial Playing Fields | 11 Gated screen to existing substation |
| 6 Feature paving detail as directional signage and play element | 12 Play-on-the-way elements included along the route |
| 7 Seating located along the route at intervals to provide | |



Elevation of the Northern Access Feature Gateway into the Site

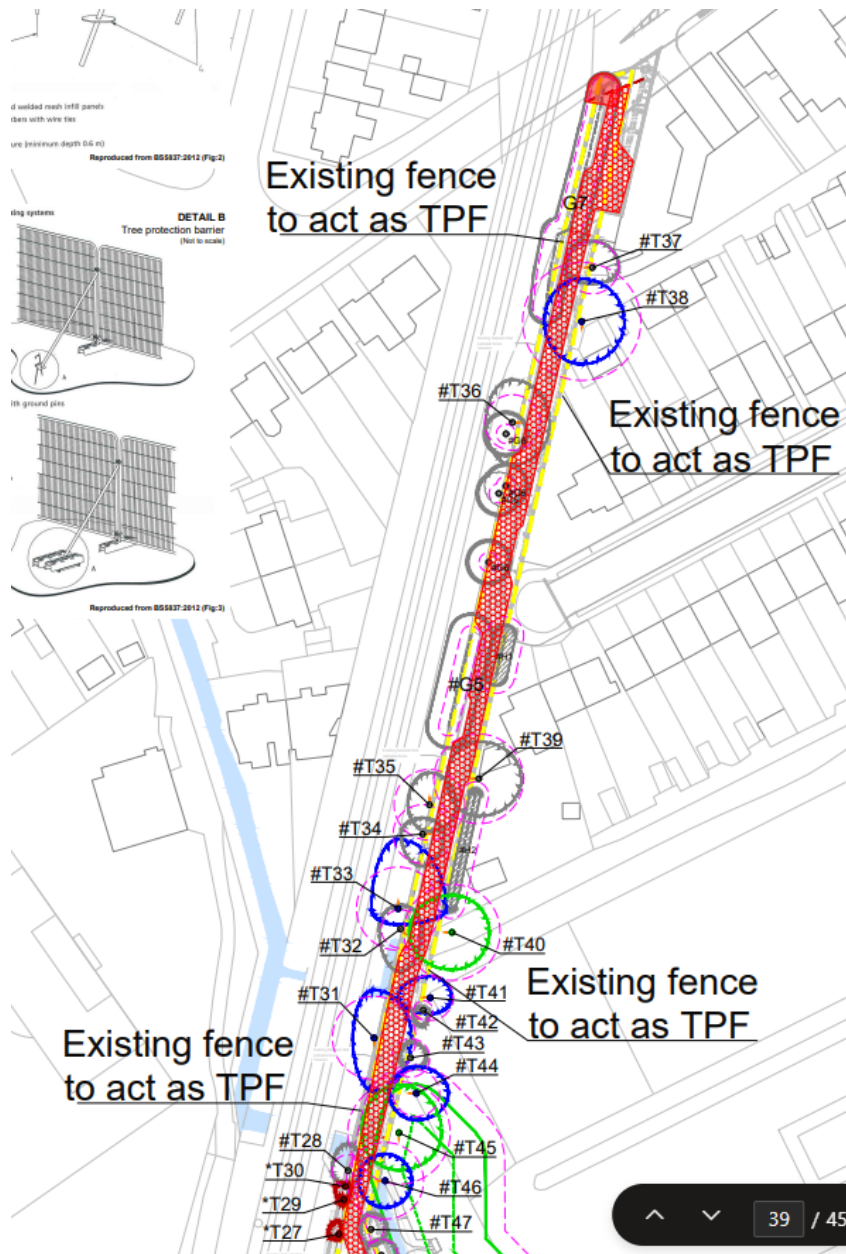


Typical Section through the Northern Access

- 3.35 The access way would be enclosed by metal rail fencing to the railway and close board timber fencing to the eastern side.
- 3.36 Lighting would be by way of 13 lighting columns (3m in height), along the northern entrance route to the wider site.
- 3.37 There would be no works to the riverbank within Merton.
- 3.38 48 trees are to be planted along the northern access path, along with areas of shrubs and herbaceous planting. No existing trees along the northern access route would be removed.

- 3.39 6 timber and steel benches are proposed along the northern access route.
- 3.40 The northern access path would be surfaced in a combination of permeable vehicular tarmac (paving type 1B), vehicular tarmac (paving type 1A), with feature paving lines.

Tree protection:



Tree planting plan:



Legend

- Existing trees retained
- Existing trees removed
- Woodland trees
- Street trees
- Riparian trees
- Ornamental trees
- Feature trees

3.41 Playspace

3.42 The Sir Joseph Hood Memorial Playing Fields are located adjacent to the Site. Whilst there is currently no direct access from the Site into the playing fields, the applicant sets out that by providing a connection, walking times to the play space would be a maximum of 4 minutes. The scheme proposes improvements to the SJHMPF.

3.43 The playspace proposed is as follows:

- 1174sqm of play is required for 0-4 year olds and this will be delivered within the Site.
- 820sqm of play is required for 5-11 year olds. 469sqm of play space for 5-8 year olds will be delivered within the Site. 351sqm of play space for 9-11 year olds will be delivered within the Sir Joseph Hood Memorial Playing Fields (off-site).
- 407sqm of play space is required for 12 -17 year olds and this will be delivered within the Sir Joseph Hood Memorial Playing Fields.
- Whilst no formal teenage provision is proposed within the development, the applicant notes that there are hang-out opportunities being delivered within the landscape that can be used by teenagers.

- 3.44 The applicant proposes the following playspace enhancement measures at the SJHMPF:
- 3.45 The applicant proposes to fund the creation of a new MUGA and related improved footpath access, for the following specific reasons:
- The existing basketball court is not up to MUGA standards &, anecdotal observation suggests, is not well used by residents - it has therefore been earmarked for improvements by the LBM Parks team.
 - The new MUGA is proposed to have a tarmac surface (for basketball/netball), this being more suitable than 2G (artificial grass – hockey or football), as the hard standing is too small for a regular 5 a side football pitch or hockey pitch, with fencing suitable for basketball/netball and, potentially, a non-standard goal mouth too.
 - This new surface & additional sports offer at the MUGA will make it more attractive for residents & thus should increase its use.
 - A new footpath access to the MUGA from the BH site and improvement to the existing path around part of the MUGA would be provided, to improve accessibility and safety.
- 3.46 The MUGA and related footpath and landscaping improvements would cover a site area of 1,396sqm (i.e. 1045sqm MUGA, 102sqm new path, 238sqm upgrade to existing path), exceeding the 758 sqm requirement for older children's play provision.
- 3.47 The applicant sets out that these proposed improvements were outlined by the parks team to cost approx £400k.
- 3.48 The applicant has provided a landscape plan which shows indicatively a number of improvements that could be made to the SJHMPF, these include:

- Existing path retained and made good.
- Proposed Trees x 6
- Mounded landscape x 4
- Picnic Tables (there are 3 with numbered annotations but there appear to be 2 more shown on the plan)
- Benches 9 benches shown
- 0-4 play equipment x 3 bits of equipment
- Accessible play equipment
- Climbing net x2
- Play tower with slide x 1
- Woodland climbing trail x 2
- Natural play tree stepping stones x 2
- Natural play boulders

Existing retained and improved play equipment:

- Swings
- Bouldering wall
- Zipwire
- Net swing

3.49 The Council could use the £400K contribution for any enhanced play facilities that it considers appropriate; the list above is indicative of a range of items that could be incorporated.

3.50 The indicative build programme is as follows:

Phase	Stage of Works	Approximate Duration	Timeframe
1	Site Clearance	2 months	TBC
2	Demolition	8 months	
3	Enabling Works	6 months	
4	Foundations, piling, tower crane	30 months	
5	Block E	36 months	
6	Block D	38 months	
7	Block C	45 months	
8	Block B	41 months	
9	Block A	47 months	

The applicant has set out that the construction programme would be 8 years from now until final occupation, taking into account any lag with final sales. The applicant indicates that the build programme itself is 4 years and would run from 2028-2032.

4. **Planning history**

The site is mainly within RBK. Planning history, within RBK is:

Reference	Description of development	Decision	Decision date
03/14178/HAZ	Continued use of the site for storage and distribution of 296.8 tonnes of natural gas	Approved	07.05.2003
01/5009/HAZ	Continued use of the site for the storage and distribution of 296.6 tonnes of natural gas	Approved	19.03.2001
92/1367/HAZ	Storage of 305.82 tonnes of natural gas	Refused	20.11.1992
92/1449/HAZ	Use of site for storage and distribution of 296.6 tonnes of natural gas	Approved	18.12.1992
453/MC	Gas Holder and Boosting Station	Approved	12.01.1949

5. **Consultation**

5.1 **Representations:**

5.1.1 Press notice. In addition, letters were sent out to 291 nearby properties within the London Borough of Merton. 141 representation raising the following objections were received:

Transport/parking

- Insufficient on-site parking, concerns regarding overspill parking.
- Lack of visitor parking.
- Poor PTAL – unsustainable transport accessibility
- Proposed mitigation – car club spaces, would not offset the impact.
- Existing rail services are overcrowded. There would be 34 additional passengers from the station for each train in the AM peak. There is a need to increase capacity.
- The report from ICENI regarding trains also has stated there are more trains than there actually are.
- Bus services are inadequate and the K5 route could not support a double decker bus to increase capacity.
- The nearby Sterling Place development (Tesco car park) and development at the former LESSA playing field have not been considered in terms of a cumulative impact.
- The area is already congested, the proposal would exacerbate this.
- The proposed development is severely unsuitable for the location, a low rise suburban area, with a low PTAL and long access routes.
- Suggest that the Council commission an independent traffic and safety audit/traffic impact study.
- Concerns that the proposal may adversely impact on the delivery of Crossrail 2, as Motspur Park would be a key junction.
- Long, narrow and dark approach routes are not suitable and would not feel safe or secure.

- Suggest that the Council reassesses the validity of Section 8 of the Environmental Statement.
- Access points are not sufficient.
- The street layout lacks dedicated cycle lanes or widened pavements to safely accommodate increased traffic.
- Traffic noise
- Local residents do not want CPZs forced upon them.
- Concern that CPZ will cost residents at least £200 a year.
- Query if motor cycle and mopeds would be able to use the northern access.
- Proper junction modelling has not been carried out. (X green lane / central road)
- Transport Assessment includes factual errors:
 - Only 555 of the 586 units are considered.
 - Trip generation underestimated
 - Fails to include a comprehensive analysis of all critical surrounding junctions.
 - No through-traffic surveys have been carried out on Merton roads.
 - Traffic counts use only a 1-hour peak, not the industry standard 3-hour AM & PM counts.
 - No modelling of barrier-down queuing, level-crossing cycle delays, or rat-running.
 - Train frequency is lower than stated.
- Parking survey was carried out in half term which is not representative of usual circumstances. Also, no weekend parking, or peak data provided.
- Assertion that residents would not walk more than 200m to their car is unsubstantiated.
- The conclusion that there are 12.5 spare parking spaces in Marina Avenue is flawed because:
 - It was recorded at 04:00–05:00 during half-term.
 - It ignores weekend sports traffic.
 - It ignores evening parking peaks.
 - It includes at least one non-existent parking space (see factual errors).
 - It excludes visitor demand from 586 dwellings.
 - It assumes zero demand from households without parking.

Construction phase

- Danger from large construction vehicles (of particular concern due to the nearby primary school)
- Construction traffic route is not suitable for large HGVs.
- 82 HGV deliveries per day would overwhelm the local road network.
- Conflict with level crossing.
- Concerns that construction vehicles could damage the riverbank
- Concerns that contractors would park in surrounding roads.

- Adverse impact in terms of noise and air quality from construction phase. Concerns regarding dust and debris also.
- Noise, dust and air quality concerns.
- Suggestion that the applicant liaise with FFC who own other entry points to the development site where HGVs could deliver material to the other side of the railway tracks and materials could be craned over.
- Query if the developer will pay for wear and tear on surrounding highways due to construction traffic.
- The 8 year construction period will result in impacts which cannot be described as temporary.

Link to Marina Avenue

- The link to Marina Avenue results in 'leaky cul-de-sac' which will increase crime and anti-social behaviour, as well as adversely impacting on residents of Marina Avenue, including 10 families with disabled children who attend Blossom House School (who require a low stimulus, quiet environment), due to increased pedestrian and cyclist trips. (conflict with Equality Act 2010 and the Human Rights Act 1998).
- Numerous back and side alleys in the surrounding area increase the potential for criminal access and provide multiple points of escape.
- Marina Avenue was purposefully designed as a cul-de-sac; opening it undermines its original planning intent.
- The Marina Avenue link is a secondary route added in response to design review panel feedback — not a necessity.
- The link to Marina Avenue should be removed from the plans, notwithstanding any proposed CCTV.
- Concerns that Marina Avenue would be used for overspill parking.
- The link to Marina Avenue will be used by e-bikes and scooters and would be dangerous. Mention of future ANPR ticketing suggests the scheme is not currently robust enough to prevent misuse.
- There is no practical or sensible reason for permitting any form of access to Marina Avenue from the service road. The developer's claim that the link promotes "social cohesion" is speculative and disregards the lived experience of residents who value the current enclosed layout.

Flood risk and drainage

- Flood Risk concerns.
- Lack of structural or hydrological study in relation to vibration or load impact on flood defences or bank stability.
- The proposed scheme would significantly increase the volume and rate of surface water directed into Beverley Brook.

Bulk, massing, design and MOL impact

- Conflict with tall buildings policies. The area is not suitable for tall buildings.
- The Kingston Council's 2019 assessment gave guidance that the gas holder site could support 78–166 homes. The proposed 586 properties is excessive.
- Adverse impact on MOL and character of the area due to height, bulk and massing.
- There are no Very Special Circumstances to justify the proposal.
- Excessive scale compared to existing structures, which are open lattice structures.
- Substantial impact on openness.
- Misrepresentation/misuse of Hillingdon Case Law cited by applicant (in relation to tall buildings).
- Dangerous/undesirable precedent could be set for MOL in RBK.
- Suggestion that buildings be lower in height.
- Adverse impact on the skyline.
- Taller buildings should be more central in the site, not at the northern end.
- Unimaginative and uninspiring design.
- Unsympathetic and insensitive form/architecture.
- Monolithic and lacking of architectural interest.
- Bulk would dominate and overwhelm local vistas.
- Overdevelopment
- The site is not entirely brownfield land (PDL) and should not be considered as such.
- Irreplaceable loss of local heritage and landmark feature.
- Existing structure is not visible at night, the proposed towers would be.

Infrastructure/services impact

- Existing infrastructure already strained (Local schools, GP surgeries, dentists, hospitals public transport, retail, community facilities, pubs, libraries, refuse collection, water and gas).
- Sewerage and drainage systems are at capacity and any additional load would cause problems.
- A comprehensive infrastructure study is needed.
- The site is not in close proximity to any services or facilities.
- Concerns that CIL funding may not be fairly distributed.

Biodiversity and ecology

- Adverse impact on wildlife and ecology from increased footfall and construction phase.
- BNG is unclear.
- Not clear if BNG has taken into account recent tree felling.

- The Ecological Impact Assessment states '...there is no direct access to the LNR from the application site...' however, clearly the application proposal does contain direct access. Should an access point be granted there must be mitigation as part of woodland management.
- The EIA has also made no assessment of recreational impacts on Wimbledon Common and Richmond Park, a legal requirement. A Habitats Regulations Assessment is legally required.
- Natural England is a statutory consultation body under The EIA Regs. However, there is no evidence that Natural England was consulted on or that it submitted a response to the EIA Scoping Report for the project. The failure to consult Natural England would be in breach of Regulation 15 (4) of The EIA Regulations.
- There are several errors in Natural England's response of no objection.
- Chemical pollution (potentially to the Brook) from clearance of gas holder infrastructure, including heavy metals, vehicle access, construction waste, spills and dust.
- Increased shade from proposed multiple housing blocks up to 16 storeys high along the length of the woodland with impacts on biodiversity.
- Proposed development creating permanent barriers to the movement of wildlife in green chain areas.
- Light and noise pollution disturbance. Light pollution can substantially affect behaviour of species active during dawn and dusk, as well as nocturnal animals. Noise pollution will disrupt breeding, nesting and foraging instincts in the area.
- Birds – 20 or more species breed in the woods each year. The number of windows in the proposed high-rise blocks will result in bird collisions due to reflective and illuminated window surfaces.
- Human activity – increased access (direct or indirect) to the nature reserve and disturbance including anti-social behaviour leading to negative impact on species habitat, breeding success ultimately leading to reductions in species diversity and abundance or even elimination or absence of particular species from the wood.
- The proposed development includes an entrance into SJHMPF off the northern access point, which is directly into the woodland. Any development that is built must have a long-term responsibility to managing and mitigating any change or impacts on this nature reserve post development.
- The Beverley Brook, also designated a SINC, runs through the woodland and alongside the proposed development. Proposed changes to the brook should also have a long-term management plan, with the developers responsible for this post development.
- Possible fragmentation of biodiverse areas/green corridors – the 'squeezing out of nature'
- Invasion of non-native species to woodland and Beverley Brook from new landscaping.
- The Management plan for the SJHMPF (2016-2023) which includes the woodland is now out of date, and although it was updated in

2020 there are still inaccuracies and there is no current evidence the woodland is actively being managed to meet the management plan objectives.

Amenity impacts

- Loss of privacy and light to nearby residential properties.
- Light pollution to nearby properties.
- Proximity of railway would result in poor living conditions.
- Some habitable rooms will not meet recommended daylight standards. 28% of new homes will be single aspect.
- Wind tunnelling effects.
- Housing mix is not policy compliant with only 10% 3 bedroom units.
- Adverse impact on air quality. An air quality study is required.
- Concern regarding noise, headlight disturbance and increased activity from southern access route.
- Berkeley is not providing sufficient play areas on site for the increase in teens, instead preferring to claim existing facilities on Sir Joseph Hood, some of which require no improvements. It is the development that should provide NEW play space for the surrounding neighbourhood, not the neighbourhood who should provide it for the development and the expected 240 children.

Inaccuracies in the submission:

- Berkeley Homes has conveniently conflated chemists (!) with GP surgeries – the two nearest GP surgeries are both a 20-minute walk away and existing GP surgeries are at capacity already. In addition to this misleading information, further misrepresentations in the Berkeley Homes proposal include:
 - Green Lane School House as a place of worship
 - the old BBC sports ground as a sporting facility despite the fact that this has been abandoned for 30 years
 - the gym in the Hamptons which is for residents only
 - Back Green Flood Plain on Green Lane as a publicly accessible open space
 - Kings College sports ground as a school.

Other matters

- Suggestion that the field on the other side of the railway line would be more suitable for development.
- Housing provided may be offered to foreign investors before UK buyers.
- Affordable housing provided may not be truly affordable.
- Proposed affordable housing falls short of required provision.

- The scheme is not viable at 0% affordable housing. The Mayors Fact Track scheme should only be used for schemes that are truly viable.
- Insufficient community consultation process.
- Concerns over contamination leaks from the existing site.
- Concerns regarding radiation levels and impacts, particularly on children.
- There is no mention of where the soil has to be remediated the soil will be - how close to residents and the school?
- The site contains SGN-regulated underground pipelines. The application provides no credible assessment of construction impacts, loading, vibration or foundation design in relation to these pipelines.
- Concerns regarding asbestos removal.
- Proposal would not achieve the aims of a sustainable development.
- A development of this scale should be in or near a town centre.
- Fire safety concerns.
- Restricted access arrangements are wholly incompatible with safe operation of fire and rescue services in a high-rise scheme.
- Concerns regarding increased crime (due to the access routes to the site backing onto residential dwellings)
- Concern that red line site area extends into neighbouring land on Kingshill Avenue.
- The developer has not altered the scheme despite community consultation.
- Suggestion that the site be used as a solar farm.
- Alternative sites should be considered.

5.1.2 6 letters of support have been received, supporting for the following reasons:

- There is real need for new homes in Motspur Park and a genuine need for affordable housing.
- The investment in local infrastructure is a great idea.
- The plans include improvements to the local nature.
- Proposals would improve the adjacent play area.
- Improvement to pedestrian routes.
- Tree planting is a benefit.

5.1.3 **Blossom House School:**

Blossom House School provides specialist education for pupils with speech, language, and communication difficulties and is located close to the site of the proposed gas holder development. We wish to formally object to Planning Application 25/02562/FUL due to the significant impact the proposed works would have on our pupils, families, and the wider community.

Construction-related concerns:

- The demolition of the gasholders and associated construction work, including heavy machinery and groundworks, will generate prolonged noise, dust, and fumes.
- Berkeley Homes has indicated that 34 heavy goods vehicles will travel via West Barnes Lane daily. West Barnes Lane and the nearby level crossing are already congested particularly during school arrival and collection times. Additional construction traffic will worsen delays, making it harder for families, many of whom rely on carefully timed routines, to bring children to school safely and on time.
- Increased construction traffic and altered access routes will pose heightened safety risks for our pupils, many of whom rely on minibuses and supervised drop-off/pick-up arrangements.

Post-construction/community concerns:

- The proposed development provides only 89 residential parking spaces (0.15 per home), likely resulting in residents parking in nearby streets. This will increase congestion and create ongoing safety risks for the local community and school.
- Increased vehicle movements following completion will continue to disrupt the safety and wellbeing of our pupils and families.

Given these concerns, we urge the council to reject the application to mitigate the significant impacts on our school and community

5.1.4

LBM Councillor John Oliver (24/12/2025)

This is my personal (as a resident and a Councillor) response to the planning application no 25/P2859. I have also jointly been involved in submitting a response from the Friends of Sir Joseph Hood Memorial Playing Field of which I am the Secretary. I have also submitted a response to Kingston Council

I am sure you have received many responses from the residents of West Barnes and possibly beyond.

I have three main points to make

Firstly - the proposed access to Marina Avenue (including lack of public transport provision)

I am opposed to the proposed linkage between Marina Avenue and the foot/cycle path to the development. Earlier in my time as a Councillor I had what I thought was the bright idea of persuading SGN to unlock

the gates at the West Barnes Lane end of the footpath and create an opening to Marina Avenue. I thought residents would appreciate a short cut to the station. I was surprised when everyone I asked about this was vehemently opposed. Cul-de-sacs are regarded as safer from crime and anti-social behaviour because there is only one way out. Security trumps connectivity. There are other cases where the same reaction has been given (eg Barnes End and Blakes Terrace). In this case there is a further consideration. The proposed development has very few parking spaces - there will be just under 500 flats with no parking spaces - apart from the railway station there is no meaningful public transport at Motspur Park. The K5 bus runs via a very circuitous route to Kingston in one direction and Morden in the other. The frequency is not even half hourly because there are only enough of the special buses needed for this route to operate every 35 minutes. There is no service in the evenings and Sundays. The PTAL score speaks for itself. Therefore it is to be expected that there will be a lot of cars needing parking space which will not be provided by the development. Residents do not want CPZs because they will (eventually if not straight away) impose costs for something that is currently free and make life more complicated for visitors etc. If there is easy access from Marina Avenue to the development the new residents will very likely seek to park in Marina Avenue just a few minutes walk from their homes.

Secondly - the substantial harm that will be caused to Metropolitan Open Land

As you will know there is a very large area of Metropolitan Open Land including Thompson's Nursery, Sir Joseph Hood Memorial Playing Field, the Gasholder site, the Horse Fields and the former BBC (now Fulham) sports ground.

The only part of this expanse of land that is fully open to the public is Sir Joseph Hood Memorial Playing Field. It is a very precious asset. The openness of Metropolitan Open Land (MOL) is protected to the same extent as Green Belt.

I attach details of my research into planning inspectorate and court decisions on planning applications that have been refused by Planning Committees (only applicants can appeal, objectors have no such opportunity).

I was surprised at the extent of the protection given to the openness of MOL with the onus on the developer to prove "very special circumstances" as to why the openness of MOL should be diminished. The case law goes on to make clear that "very special" means "site specific" ie a general reason like "shortage of housing" is not site specific, that's a widespread problem. Even where the local authority in question had failed year after year to meet it's housing targets and had no "pipeline" that would enable it to do so in future the appeal was

rejected on the grounds that this too was a generic circumstance and not exceptional. The proposed buildings will not only overwhelm the playing field but the total effect of the blocks will be to transform the environment from a low density/suburban one into a city scape. All the Councils involved (Kingston, Sutton and Merton) agree that tall buildings are for town centres only.

West Barnes has had a massive development imposed on it in Burlington Road as a result of the Council not having, at that time, a local plan indicating where building would be possible. The difference this time is that we are talking about the effect on a precious landscape rather than an ordinary site next to a trunk road. This does not mean there should be no development - but the scale must be such that the openness of the MOL is not impaired.

Therefore I oppose the scale and mass of the development. I think 10 storeys would be a reasonable maximum.

Thirdly - play facilities

Not only does the development not provide enough parking spaces for the likely needs of its residents it also fails to provide enough playing space for the expected numbers of children. The play facilities at Sir Joseph Hood will already have to cater for children from the Burlington Road (Tesco) development. Apart from the basket ball courts the play facilities are aimed at young children (for whom there will be provision within the gasholder site).

Therefore we need to think very carefully about what additional facilities might be provided and where they are to go. The Crazy Golf is in fact popular and it has been successfully opened during the winter. Perhaps with a thorough refurbishment of the pavilion we could create something indoors that would provide a place for young people to hang out after school in all weathers. What we don't want is lots more children using the woods as places to make dens and light fires. A lot more creativity is needed by the developer in coming up with innovative ideas. I oppose all the suggestions I have seen so far.

A final point is that I believe the viability calculations are flawed. The costs of dismantling the gas holders and de-contaminating the land should not be included as costs in the viability calculations.

SGN is already obliged to do them. Equally when considering changes to openness the baseline should be the scene without the gasholders as these would have gone by 2029 anyway.

5.1.5

LBM Councillor Robert Page (26/10/2025)

I write as a ward councillor for West Barnes Ward in relation to the above application.

Please note I have not yet commented on the substance of the application. My comments below are subject to and in addition to any further comments I might make about the substance of the application.

Therefore, subject to the above, should planning officers be minded to recommend the application for approval, I request that neighbouring residents' amenity is protected during the build itself, as far as it can possibly be done.

Under DM D2 (A)(xiii) of the Sites and Policies Plan, development must "Ensure that the traffic and construction activity do not adversely impact or cause inconvenience in the day to day lives of those living and working nearby, and do not harm road safety or significantly increase traffic congestion".

To meet this, I would foresee strict controls on noise, dust and dirt, hours of operation and especially site-traffic movements. It is my view that that HGVs and other large vehicles connected to the site should be prohibited from accessing the site from west Barnes lane except between 9:30am and 2:30pm Monday-Friday during school terms and until 4pm outside of school terms.

I appreciate most of these matters would be dealt with via a construction management and construction logistics plan, but I would encourage there to be greater consultation and engagement about these matters and the development of these plans. As such I would request that rather than just a condition that these plans be provided, thought is put into whether the conditions could be stronger and set out some of these factors.

Given the location of the site, and the site entrance adjacent to the level crossing, vehicles accessing the site at rush hour could bring local traffic to a standstill. There is a safety risk if drivers start to become frustrated and are tempted to cross the level crossing at dangerous times, having had to wait for heavy vehicles to access the site.

West Barnes Lane is used and crossed by primary school children attending sacred heart and St John Fisher schools, and secondary school children attending Raynes Park High. Blossom Hill school is also on the access route, this is a specialist school for special needs pupils. Every effort should be made to prevent heavy vehicles accessing west Barnes lane during school pick up or drop off hours due to the danger they pose on a narrow residential road.

I would also suggest that the developer provides contact details to neighbouring residents to provide them the opportunity to contact the developer and construction team in emergencies.

I look forward to hearing from you what might be possible.

Yours in relation to the above application.

Further comments (10/11/2025):

One further point on the hours of operation is that, in the afternoon especially, the developers would find their vehicles would just be stuck in traffic. Due to Blossom Hills status as a SEND school, and given the areas limited connectivity to other places in Merton (the K5 bus is the only local bus and it's once an hour, and the station is not helpful for travelling within Merton) it means a lot of the children are driven to and from school. They would find a lorry stuck in gridlock by the junction with station road. Restricting the hours would do them a favour!

Further comments (02/12/2025):

1. The current site plan places the largest buildings to the north, next to Marina Ave, Motspur Park and the recreation ground. This seems designed to break up the visual impact for residents to the south at the expense of residents to the north. The plans should give both Merton and Sutton/Kingston residents equal weighting with a design that also breaks up the visual impact for Merton residents e.g. by placing larger buildings in the middle of the site, or by reducing the height of the largest building.
2. Marina Ave is currently a quiet cul-de-sac and the site access arrangements during construction should maintain this if the application proceeds – Marina ave should remain a cul de sac throughout this period. The final design, if approved, should also consider how this wish from Marina Ave residents can be respected, especially noting the impact cul de sacs have on reducing crime. The final design, if approved, should not decrease public safety by either creating dark or unlit alleyways where pedestrians will be unsafe, or feel unsafe, or by altering existing features in a way that reduces public safety.

Further comments on 24/01/2026:

Safer crossings at the roundabout between west Barnes lane and crossway (zebra crossings) would be needed if the route was to be used for heavy construction traffic.

This is due to the school pedestrian traffic - both to the schools to the west (sacred heart and Raynes Park high) to the east (st John fisher) and also due to the school playing fields located off Kingsway

5.1.6

West Barnes Residents' Association (04/12/2025)

Introduction

We note that this planning application is for a site principally located in the Royal Borough of Kingston upon Thames (RBK). However, the northern of its existing two access points to the public road network is located in the London Borough of Merton (Merton). Additionally, the Applicant proposes opening a new pedestrian/cycle access from the application site to the end of Marina Avenue, which is in Merton. This road is an existing cul-de-sac, with no access (pedestrian or otherwise) from its end.

The application is for 5 blocks of flats, up to 16 storeys high. Whilst these tall buildings would be located in RBK, their very proximity to the boundary with Merton, obviously means they would have a significant visual impact on Merton. The application site is also within an area of Metropolitan Open Land, which extends across the boundary between RBK and Merton.

We, the Raynes Park and West Barnes Residents' Association (RPWBRA), have already submitted an objection to this application to RBK.

The following comments, therefore, focus on the adverse impacts that this Application would have on Merton:

- Conflict with Tall Buildings Policies
- Traffic & Highways Concerns
- Road Safety and Construction Traffic
- Conflict with Secured by Design – Marina Avenue
- Damage to Metropolitan Open Land
- Architectural Conflict with Neighbourhood Character
- Adverse Impact on Nature Conservation
- Adverse Impact on The Sir Joseph Hood Memorial Playing Fields

Conflict with Tall Buildings Policies

The Application Site is not located within those areas which are nominated within RBK's Tall Building Policy, as being suitable for tall buildings. Due to the site's close proximity to Merton, and consequent visual impact, we consider that the Applicant should also comply with Merton's Policy D 12.6 "Tall Buildings". In particular, Section 3.b requires that "massing, bulk and height are appropriately sized" and "demonstrate they take into account local character".

The Applicant claims its proposed massing is designed to create a sense of openness within the development. However, the Applicant's proposal to cram 586 dwellings onto the site results in the exact opposite to a "sense of openness". In reality, the proposed massing is located in the middle of a large residential area consisting of 2 or 3 storey suburban "between-the-wars" houses.

Also, the Applicant has chosen to position the 5 blocks of flats such that the tallest (16 storeys) is located very close to the existing streets

in the “KT3” (Motspur Park) area of Merton, i.e. Marina Avenue, Station Road and West Barnes Lane. It would thus be overbearing and loom over these nearby streets and homes.

The Application is also in conflict with the National Planning Policy Framework. This requires that developments will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development and are visually attractive, as a result of good architecture, layout and appropriate and effective landscaping. We consider that the Applicant’s proposals fail all these three tests.

Traffic & Highways Concerns

We consider that the Applicant’s traffic generation studies will not reflect the reality that will be faced by the occupants of the development.

The Application Site has a very low Public Transport Accessibility Level (PTAL) of between “Zero” and “1b”. The Applicant’s traffic analysis is flawed, as it has used as a basis of its traffic assessment, data derived from comparison developments with much higher PTAL scores.

Motspur Park is not an area that provides significant employment or services. Therefore, the residents from the proposed development will need to travel for work and to access schools, leisure, health and other services.

Despite the Applicant’s endeavours to limit the number of parking spaces, it is inevitable that, with such a low PTAL Score (Zero to 1b), the occupants of the proposed development will need to have daily access to private transport.

The proposed development is in conflict with the London Plan (Policy T6 Residential Car parking). This states that in town centres, which generally have good access to a range of services within walking distance, car-free lifestyles are a realistic option for many people living there. However, for sites with an extremely low PTAL score, (e.g. this Application Site), the Policy allows up to 1.5 parking spaces per home for new developments in PTAL 0-1 zones in outer London. This Application thus ignores this Policy.

The Applicant’s suggestion that by only providing 86 car-parking spaces for 586 new homes will somehow promote the use of public transport, walking or cycling, at this location is plainly ludicrous. Somehow, the new residents will be forced to find somewhere to park their cars and work vehicles. This will affect neighbouring streets, not only in Kingston, but also in Merton.

4. Road Safety and Construction Traffic

The Applicant proposes using the existing vehicular access from West Barnes Lane for in-bound construction traffic. This is only a few metres away from the level-crossing gates at Motspur Park. In order to avoid the dangers of turning traffic causing queues across the level-crossing, the Applicant proposes to route all in-bound construction traffic from the north, along West Barnes Lane (i.e. using a left turn only, to access the site).

However, due to width restrictions in the West Barnes area, this proposed route would have to approach the site from the A3, via the following route:

- Exit the A3 at Shannon Corner,
- Turn northeast along Burlington Road (540 m),
- Turn southeast to join West Barnes Lane, across the level-crossing
- Continue along West Barnes Lane to Motspur Park, turning southwest at the junction with Crossway. (1.2 km)

This route passes close to two schools, Sacred Heart Primary School and Blossom House School, and passes through residential streets. Therefore, in the event that the Application were approved by RBK, restrictions on the hours of access for the site (both for removal of the gasholders and for construction) should be imposed for reasons of public safety and tranquillity.

The Proposals conflict with Secured by Design – Marina Avenue
The Applicant proposes to open the end of Marina Avenue to allow pedestrian and cycle access to Marina Avenue and adjoining residential streets. This is in conflict with the design principles recommended by “Secured by Design” (SBD). This is a UK police initiative that aims to reduce crime by improving the security of buildings and their surroundings, through design principles and security standards.

Section 8 of the SBD Residential (Homes) Guide 2025, states that the security benefit of a cul-de-sac can be compromised if it backs onto (inter alia) railway lines and long footpaths. This is an exact description of the proposed link to Marina Avenue.

Additionally, the Guide states that cul-de-sacs that connect footpaths to other parts of a development experience the higher levels of crime when compared to crime levels within a cul-de-sac (i.e. 110% higher) and therefore should be avoided.

This is thus irrefutable evidence that the Applicant’s proposal to open up access into Marina Avenue will probably lead to an increase in crime, which must be avoided.

Damage to Metropolitan Open Land

The Application Site is within of an area of designated Metropolitan Open Land (MOL), which is part of an almost contiguous area of 300 acres. This large single area of MOL extends into the boundaries of three boroughs, Kingston, Merton and Sutton. It is one single area, apart from the narrow space taken by the railway lines.

The London Plan Policy G3 states that any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs. MOL boundaries should only be changed in exceptional circumstances.

This is further enforced by Merton's policy O15.2, which places a high value on green infrastructure and strives to protect and enhance Metropolitan Open Land. Clearly, this Application conflicts with these policies, as it would destroy MOL. Consequently, it would also degrade the openness and environmental value of the wider Metropolitan Open Land, including that part which is within Merton.

Architectural Conflict with Neighbourhood Character

Again, whilst the Application Site is located in RBK, it is within an extensive area of 2 or 3 storey suburban mid-twentieth century houses. It would be highly visible from within this part of Merton and we therefore aver that the Application should comply with Merton's Policy D 12.2 "Urban Design".

This Policy requires that proposals should (inter alia):

- Have an appropriate street level presence and roofscape,
- Ensure that scale, height, mass, bulk and form is appropriate and assessed for visual impact, including long distance views,
- Consider the enhancement of views and settings.

We therefore aver that the applicant's proposals, being in direct conflict with the existing local architectural character, are in breach of Policy D 12.2. 8. Adverse Impact on Nature Conservation

Nature's reach is not constrained by local government boundaries and neither do wild fauna and flora confine themselves to a particular borough. Therefore, development proposals such as this, so close to Merton's boundary, must have an impact on Merton's biodiversity and residents' access to nature.

We also aver that the Application is in conflict with the London Plan Policy G6, which mandates that biodiversity impacts be addressed from the outset and that priority species and habitats be protected and enhanced.

Currently, the site supports a rich and interconnected ecological network, including common and soprano pipistrelle bats, slow worms and numerous breeding bird species. The proposed development

would lead to a degradation of the various habitats that support these species.

Merton's Policy O 15.3 "Biodiversity and Access to Nature", Section 1e, requires developments to follow the following mitigation hierarchy:

- Avoid damaging ecological features
- Minimise spatial impact and mitigate it.
- Delivery of off-site compensation of better biodiversity

We therefore aver that the Application does not comply with this requirement, due to its inevitable impact on biodiversity.

Adverse Impact on The Sir Joseph Hood Memorial Playing Fields

The London Plan and local planning guidance require that new developments:

- Respect the scale, massing, and character of their surroundings
- Avoid visual dominance or townscape disruption
- Provide accurate and honest visual representations to inform decision-making

We consider the Applicant's assessments of visual impact of the proposed development as being misleading for the following reasons:

- Key viewpoints are obstructed by trees, bushes, or wide-angle distortion, making the towers appear hidden or more distant than as seen by the human eye.
- Images are taken from distant viewpoints, failing to show how overbearing the development will be.
- The applicant has conveniently used summer-time imagery, when trees are in full leaf, to mask the true visual impact of the towers.

In reality, the proposed development will loom over the Sir Joseph Hood Memorial Playing Field, damaging the open aspect of the public park, which is enjoyed by the residents in Old Malden and Motspur Park and visitors from further afield.

Conclusion

For the above reasons the Raynes Park and West Barnes Residents' Association urges the Planning Committee of the London Borough of Merton to refuse this application.

5.1.7

Marina Avenue Neighbourhood Group (24/12/205)

(Comments submitted by Rebecca Hogan of 105 Marina Avenue on behalf of the group.)

Marina Avenue Neighbourhood Group

The Marina Avenue Neighbourhood Group represents the residents of Marina Avenue, a quiet cul-de-sac on the edge of the Sir Joseph Hood Memorial Playing Field, and one of the streets that would be most affected by this development.

The Marina Avenue Neighbourhood Group objects to this proposal on the following grounds:

- The proposed access route into Marina Avenue is unnecessary and strongly opposed by residents
- Issues with traffic and emergency access
- Inappropriate height and massing of the buildings
- The development is out of character with the local area
- The development will have a detrimental effect on Metropolitan Open Land (MOL)
- The cumulative effect of the development has not been considered

Objection to the proposed pedestrian and cycle access link from the northern access route into Marina Avenue

This proposed access link represents a fundamental and irreversible change to the character and safety of a long-established, peaceful cul-de-sac community.

There will be a loss of residential amenity. Marina Avenue is a quiet cul-de-sac, purposefully designed to foster privacy and community. Increased footfall, especially during early mornings, evenings, and weekends would disrupt this character. The introduction of pedestrian and cycle access invites frequent movement of bicycles, e-bikes, and potentially motorbikes, increasing noise and reducing the sense of safety and tranquillity. The developer's claim that the link promotes "social cohesion" is speculative and disregards the lived experience of residents who value the current enclosed layout. Opening Marina Avenue undermines its original planning intent as a cul-de-sac impacting the local character of the area and sets a precedent for further erosion of established neighbourhood design. The proposal prioritises permeability over the protection of residential character, a trade-off that residents do not support.

There are safety and security concerns. The new access point may facilitate antisocial behaviour and opportunistic crime. Merton officers have raised concerns about mopeds, scooters, and e-bikes using the link as a high-speed cut-through, creating conflict with pedestrians. Reliance on signage, CCTV, and concierge services is reactive and unproven. Mention of future ANPR ticketing suggests the scheme is not currently robust enough to prevent misuse. Secured by Design (Residential Homes Guide 2025 (8.4-8.8) states that more permeability (leaky cul-de-sacs) leads to more crime; cul-de-sacs connected by footpaths to other parts of a development can lead to higher crime compared to a 'true' cul-de-sac.

The street layout lacks dedicated cycle lanes or widened pavements to safely accommodate increased traffic. Without significant upgrades to these infrastructure limitations, the area is unsuitable for increased mixed-use traffic and vulnerable to misuse by motorised vehicles.

The development will also increase parking demand in surrounding streets. Opening Marina Avenue is likely to encourage overspill parking and access through the pedestrian link, causing congestion and parking pressure on availability for existing residents. This is supported by the ICENI parking survey analysis, which states a 76% parking stress on Marina Avenue. However, this parking stress is likely to be far higher due to the timing of the survey, and the unique location of the avenue - close to a commuter train station, and a local park with high usage at weekends by Motspur Park Football Club and Raynes Park Little League. These factors mean that peak parking stress at weekends, during the working day and on summer evenings is likely to be higher than the overnight peak expected by the Lambeth Methodology. We therefore request that an additional parking survey be carried out before any permission is granted, taking into account these times of peak parking stress.

Opening the proposed access route will also have a significant negative effect on vulnerable residents on Marina Avenue, including a number of children with Special Educational Needs who live on the street and attend the nearby Blossom House School. The parents of these children chose to live on Marina Avenue because its character as a quiet cul-de-sac provides a secure, low-stimulation environment that is essential to the wellbeing of their children. Opening up the cul-de-sac to pedestrian and cycle traffic would hugely increase the number of people on the street each day, causing noise which would affect children suffering from sleep disorders, anxiety in children with sensory processing disorders and safety risks for children with poor danger awareness.

Merton officers have acknowledged that parents of children with disabilities believe the proposal would negatively affect their children's health, wellbeing, and safety. The developer admits that "reasonable adjustments" may be necessary but has not demonstrated how these will be implemented. The proposal risks placing disabled residents at a "substantial disadvantage," breaching the council's legal obligations under the Equality Act 2010. All for an access route that is not required for any reason.

The development already includes primary pedestrian/cycle/emergency access from West Barnes Lane and Kingshill Avenue. The Marina Avenue link is a secondary route and is not a necessity. Existing pedestrian and cycle routes provide adequate connectivity. This link offers marginal benefit at disproportionate cost to local amenity.

The developer acknowledges “opposing views” but has retained the link without meaningful engagement with residents. This undermines principles of transparency, community engagement, and inclusive planning. The access link is unnecessary, poorly justified, and detrimental to the safety, character, and wellbeing of existing residents in Marina Avenue and the wider neighbourhood. We urge the developer to remove this access link from the plans for the development.

Issues with construction traffic, HGV movements, level crossing considerations and emergency access

The Environmental Statement acknowledges significant vehicles related to demolition and construction will be accessing the site (up to 50 per day) and 80% will be HGVs. This level of heavy vehicle activity will cause severe congestion on local roads, particularly during commuter hours and school runs. It will also 3 disrupt bus services (K5, 131 add 152) and increase journey times, contrary to sustainable transport objectives, and increase noise and air pollution in residential areas.

The Environmental Statement fails to assess the impact of increased HGV traffic on the West Barnes Lane level crossings (Motspur Park and Raynes Park crossings). The level crossing barriers are already down for extended periods during peak times, causing significant delays and backed up traffic. Additional HGVs turning at the crossing will worsen congestion and create gridlock in both directions, particularly at the Raynes Park crossing. Once Stirling Place flats are occupied, increased car ownership will compound delays. Emergency access to the site and Marina Avenue will be further compromised by queuing traffic at the crossing, despite “Keep Clear” markings. The omission (a significant gap in the CTMP) to consider the impact of the level crossing and increased construction traffic, conflicts with London Plan Policy T4 and Merton Local Plan Policy T6, which require comprehensive assessment of transport network constraints. London Plan Policy T4 states: “The cumulative impacts of development on public transport and the road network capacity including walking and cycling... should be taken into account and mitigated.” Merton Local Plan Policy T6 prioritises safety, connectivity, and sustainable travel – with reduced connectivity due to gridlock delays and increased vehicle idling increasing pollution emissions, this conflicts with the plan.

The Environmental Statement proposes traffic marshals and scheduling but lacks clear enforcement mechanisms or penalties for non-compliance. No detailed contingency plan is provided for peak-hour conflicts or emergency scenarios.

We request that a revised Construction Traffic Management Plan (CTMP) is produced and a supplementary transport assessment addressing level crossing delays, cumulative traffic impacts, and emergency access. In conclusion, the Environmental Statement does

not adequately address the severe transport and access impacts of this development. Without robust mitigation and enforceable conditions, the proposal will result in unacceptable harm to local traffic flow, safety, and emergency access. We respectfully request that the application be refused or deferred until these issues are fully addressed.

The height and massing of the buildings in the proposed development are inappropriate

Height

The proposal includes five tower blocks reaching up to 16 storeys, far exceeding the height of any existing buildings in Motspur Park and its surrounding 2-3 storey suburban neighbourhoods. These heights directly conflict with Kingston's tall building policy, as well as the London Plan.

London Plan Policy D9 (B3) clearly states that "Tall buildings should only be developed in locations that are identified as suitable in Development Plans." The proposed location of this development is not identified anywhere as appropriate for tall buildings. The applicant cannot rely on "best use of land" arguments that encourage the development of "brownfield land" (Policy GG2 A) because of subsequent requirements in GG2 to prioritise sites that are:

- "well-connected by existing or planned public transport" (GG2 B). This site is extremely poorly connected: most areas of the proposed development have a PTAL of 0.
- "well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling" (GG2 C). As above, most areas of the site have a PTAL of 0, and there are few jobs, services and amenities close enough to access via walking and cycling.
- "protect and enhance London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces" (GG2 F). The proposed development would permanently damage the adjacent Metropolitan Open Land, as well as posing a risk to SINC's on site.

Kingston Core Strategy and Draft Tall Buildings Strategy

Kingston's Core Strategy (CS8) does not designate the gas holder site as suitable for tall buildings, instead stating that "tall buildings will not be considered appropriate in locations such as the edge of the Green Belt or MOL or in the middle of low density, low rise residential areas." (Paragraph 6.71).

Kingston's Draft Tall Buildings Strategy (2023) identifies four town centre areas as suitable for tall buildings, and further states that "Outside of the four key areas with high suitability, the remainder of the borough is generally considered to be unsuitable for the development of tall buildings. This is because of its prevailing low rise character and low levels of public transport accessibility." These two factors

(prevailing low rise character and low levels of accessibility) certainly apply to the proposed site of this development.

Further, the strategy also offers a list of criteria that make a site particularly sensitive to tall building development. This site aligns with four of the eleven criteria: “1. Areas that do not have any buildings that exceed the borough’s tall building definition”, “5. Within Green Belt or Metropolitan Open Land”, “6. Within green open spaces and nature reserves” (the site forms part of a Green Corridor and is adjacent to SINC), “Poor levels of public transport accessibility (for example, PTAL score 0-3)” (p.18).

Finally, the strategy states that “Areas not identified as being suitable for tall buildings may be suited for other forms of high density development, including mid-rise building heights.” Given the suburban context and mostly PTAL 0 rating, both building height and overall development density should be lower. A mid-rise scheme (4 to 6 storeys) would be significantly more appropriate in this area, and more consistent with the policy landscape. Such a development would help to deliver much-needed housing in the area, while not permanently damaging existing communities.

Inappropriate Massing

The proposed layout of the development cannot be justified against alternative layouts. The tallest tower is currently planned for the northern edge of the development, closest to the existing houses in Marina Avenue. This goes against the established principle that taller buildings must be placed where their impacts are least harmful. This typically requires them to be located at the centre of a site.

For example, Policy D9 (C1) of the London Plan states that “The design, scale and massing of tall buildings should respond to the scale, character and form of their surroundings.” Since the surroundings of this site are low-rise suburbs and open land, tall elements cannot be placed on the edges of a development without failing this test.

London Plan Policy D9 Paragraph 3.9.3 states that tall buildings should be “appropriate for their location and do not lead to unacceptable impacts on the local area.” A tall block adjacent to a boundary with 2-3 storey houses is quite clearly an unacceptable local impact. Locating the tallest buildings in a central position would reduce that impact.

London Plan Policy D3 Paragraph 3.3.8 says of buildings that “Their massing, scale and layout should help make public spaces coherent and complement the existing streetscape and surrounding area.” Situating the tallest buildings in the centre of a development would do more to complement the surrounding low-rise suburban streetscape than placing them at the edge of the development.

Kingston Tall Buildings Strategy repeatedly states this principle of stepping down height towards the edge of a built-up area.

- “Tall buildings close to areas of more consistently low building scale... should scale down, minimising large contrasts in height to its surroundings.” (p.33)
- “New tall buildings in envelopes on the edge of the town centre should address this change in scale by stepping down, and mediating their massing to reduce their visual impact.” (p.26)

We urge the developer to consider significantly reducing the height of the buildings, and to move the tallest tower away from low-rise streets into the centre of the site. We also urge Merton Council to support this principle.

The proposed development is out of character with the area’s suburban context.

The site is part of a low-rise suburban area.

The proposed development bears no relationship to the character of the surrounding neighbourhoods, which are defined by consistent low-rise suburban housing dating from the 1920s and 1930s in the Station Estate (to the south), Motspur Park (to the west) and West Barnes (to the north east).

The applicant claims that “the site itself is distinct: isolated from the immediate grain of housing, enclosed by green and infrastructural edges, and therefore capable of accommodating buildings of a larger scale”, but this is factually inaccurate. Historically, the gas holder site formed part of the same land parcel as the Kingshill and Station Estate areas. Kingston’s Old Malden Character Study specifically states that “Views to the north [of the Kingshill Estate] of the gas holders have a significant impact on the character of the area”, demonstrating that the site is visually and contextually part of the surrounding suburban neighbourhood.

Merton’s character study describes the Motspur Park area and the limited potential for intensive development due to its consistent low-rise character: “Consistency of character and format across the whole area means there are limited opportunities for intensification beyond plot-by-plot.” The council does identify potential scope to intensify housing development in the area, but this is specifically “immediately around the station itself”, not on the gasholder site.

Conflict With National and Local Policy

The NPPF states that “Planning policies and decisions should support development that makes efficient use of land, taking into account the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change.” (paragraph 129). The area has a strong character, and there

is no current identified need for regeneration, so the proposed development does not fulfil these criteria.

Kingston Core Strategy Policy CS8 states that “The Council will protect the primarily suburban character of the Borough... from inappropriate development”. And Policy DM10 explicitly requires that new developments respect, maintain and enhance the following in order to contribute to “the character and local distinctiveness of a street or area”:

- “prevailing development typology, including housing types, sizes and occupancy”
- “prevailing density of the surrounding area”
- “scale, layout, height, form (including roof forms), massing”

Proposals should also:

- “protect the quality, character, scale and skylines of sensitive areas and safeguard strategic and local views”

It is clear that introducing a high-density development composed of high-rise towers into an area composed of predominantly low-rise 2-3 storey houses goes against this policy.

The London Plan does state that “As change is a fundamental characteristic of London, respecting character and accommodating change should not be seen as mutually exclusive. Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change.” While we understand this sentiment, we do not believe that this proposal strikes an appropriate balance between accommodating change and respecting character, instead representing a fundamental shift in character from a suburban area to a more urban one. The scale of the development must be reduced to avoid this.

Kingston’s Local Plan Site Assessments (2019) concluded that the site could accommodate 78-166 homes, consistent with the area’s suburban character (p.170). The applicant proposes 586 units, which can only be achieved by introducing extremely tall buildings into an area that is fundamentally unsuited to them. We understand and support the need for housing in the area, but not at any cost.

The development will have a detrimental effect on MOL
The proposed development is on an area which has been designated MOL, and which lies within a larger area of MOL. This larger area also has the strategic designation of Green Corridor.

Impact on adjacent MOL

Policy DM5 of Kingston’s Core Strategy states that “The Council will... only allow development on sites adjacent to the Green Belt, MOL or

other open space designation that does not have a detrimental impact on its visual amenities.” Merton’s Local Plan also promises to ensure Merton remains a green borough by “Protecting and enhancing open spaces in the borough including Metropolitan Open Land... to provide high quality environments for all residents” (Local Plan: Green and Blue Infrastructure p.473). The Sir Joseph Hood Memorial Playing Field (also MOL) is adjacent to the proposed site. This park is widely used by the local community, and it certainly fulfils the London Plan’s description of Metropolitan Open Land: “MOL protects and enhances the open environment and improves Londoners’ quality of life by providing localities which offer sporting and leisure use, heritage value, biodiversity, food growing, and health benefits through encouraging walking, running and other physical activity.” (Paragraph 8.3.1). There are no other tall buildings in the vicinity, and the field gives residents the feeling of being surrounded by nature. The visual amenity of the Playing Field would be irreversibly damaged by this development looming over it and destroying its sense of openness and immersion in nature. Also, the wider area is lacking in other publicly accessible green space, so to encroach on the ‘openness’ of this playing field would have a hugely detrimental effect on local residents.

In addition, Kingston’s Core Strategy states that “The Council will... ensure that development proposals do not harm open spaces which contribute to the character, appearance and heritage value of the Borough’s open space network”. Although much of the publicly accessible MOL affected by this development lies in Merton rather than Kingston, it would seem extremely unjust to strictly apply this principle to Kingston only, ignoring the open space network in Merton (which is also enjoyed by Kingston residents).

Even though the proposed site already contains the gasholder structures, it is also true that not all development has the same impact on openness. Kingston’s 2018 MOL review states that “Not all built development is considered to impinge on openness.” (p.6), and the extent of the impact depends on its scale and form. We would argue that transparent gas holders have a very different form to solid, bulky tower blocks, and therefore this proposed change in form will have a much greater detrimental impact on the openness of the adjacent MOL.

Opportunity to enhance the space

Kingston’s 2018 ‘Green Belt and Metropolitan Open Land Assessment’ found that the proposed site for this development (Parcel 22) made a “significant contribution” to MOL criteria, despite having been previously developed. In their own ‘Metropolitan Open Land Assessment’, the applicant attempts to argue that this assessment is incorrect, that this area of MOL should instead be classified as Previously Developed Land, and that it is therefore a suitable site for a high-density housing development. However, once MOL is lost, it is lost forever. We would argue that the demolition of the gasholders provides

a golden opportunity to enhance and improve access to more green space in the area, protecting it for future generations.

Finally, the Core Strategy states that the borough does not have a surplus of public open space, and commits to “seek the retention and creation of new public open space to ensure this finite resource is kept and enhanced to meet the needs of future generations.” (Paragraph 6.34). In addition, the London Plan states that “boroughs should work with partners to enhance the quality and range of uses of MOL.” (Policy G3 A2). Instead of using the fact that part of the site has been previously developed as justification for further and more intensive development, we urge Merton Council to encourage Kingston Council to take the opportunity to enhance this open space, allow access to the public and truly connect it with the adjacent areas of MOL.

The cumulative effect of the development has not been considered. According to the London Plan (Policy D2), the density of development proposals should “consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels.” The Sterling 7 Place development is currently under construction, and it is less than 1 mile from the edge of the gasholders site (the northern access route). However, the cumulative effects of Sterling Place and the proposed gasholders development on local infrastructure, such as transport and road infrastructure, or local services like schools, GP surgeries and green spaces, have not been assessed. We request that the developers be required to produce new impact assessments using the likely situation after the completion of the Sterling Place development as the baseline, rather than the present situation.

If these new assessments demonstrate that the capacity of local infrastructure will be exceeded, then “additional infrastructure proportionate to the development should be delivered through the development” (London Plan Policy D2). Currently, there is no plan for this, and no guarantee that sufficient section 106 funds will be allocated to Merton to ease these impacts on Merton residents, since the bulk of the development lies within Kingston. We request that Merton negotiate a realistic proportion of section 106 funding be allocated to Merton in order to mitigate the impact on Merton residents.

5.1.8

Worcester Park Flood Forum

The Worcester Park Flood Forum was instigated by concerned local residents following the extensive 2021 flooding on the area south of the development site in question; we work with support and under the guidance of The National Flood Forum. Flooding was noted to be also extensive north and south of this development site. It is our opinion that the extent of this flooding was contributed to because of flow restrictions at both ends of the Motspur Park Gasholders development site - planning application no 25/P2859 applies.

Based on our investigations with all agencies since the 2021 floods we wish to raise the following points and comments regarding the development proposal:

- Under The Flood Risk Regulations of 2009 Section 14, and under the Floods and Water Management Act of 2010 statutory duties will apply to the Lead Local Authorities through which this river, and its feeds, runs. Kingston Council & Merton Council are the lead local authorities for this section of the brook and are obliged to maintain a local flood risk management strategy, with a duty to identify risk of flood & mitigate risk. National Planning Policy Framework [NPPF] regarding Flood Risk Assessment requires due weight to be given to flooding, we believe this has been addressed incorrectly by the developers within their proposal:
- A recently produced planning flood zone map from the Environment Agency states this site is located within Flood Zone 2 and part of the site and surrounding areas are designated Flood Zone 3. The developer seeks to discard this designation in its submission. Their consultants have attempted to suggest the Environment Agency and its consultants are incorrect in its assessment of the Environment Agency flood risk assessment of the site. We believe these statements made are incorrect & support the designation made by the Environment Agency.
- Substantial attempted flood alleviation works were undertaken by the Environment Agency in 2011/12 in Green Lane that have not been proved to be fully effective, in 2021 the area flooded again. These alleviation works, half a mile upstream from the development site, were instigated to address flood risks evident in Green Lane in 2007. In 2021 it was clear that that did not contribute to reduced flooding within the development site, however work on the development site could very well have the opposite effect in Green lane Worcester Park.
- Following the 2021 floods Section 19 reports were produced by the four councils in the immediate catchment area of this section of the Beverley Brook [Kingston, Surrey, Merton & Sutton] that confirm hydraulic incapacity, and indeed hydraulic lock, were a factor in different parts of the Beverley Brook catchment area.
- In the Sutton section 19 report a further flood alleviation scheme has been proposed in Cuddington Recreation Ground to address the flooding in Sandringham Avenue & surrounding roads, some 200 homes. This was not designed to alleviate at the development site, some 1.2 miles away, as has been suggested by the developer's consultants.
- We believe the risk of flooding remains high in the area of this development site & should be considered carefully in addressing this proposal and properly mitigated for in any planning consent that is given. ¶ Paragraphs 170 to 175 of the NPPF 12/24 outlines the Sequential and Exception Tests as a means of

directing new development proposals to areas at the lowest risk of flooding.

- Paragraphs 170/171/174 specifically addresses cumulative flood risk impacts & states that strategic and planning policy on flood risk should consider cumulative flood risk impacts from all sources:
- These sources include the culverted feeds running downhill from Cheam via Worcester Park directly, from Surrey in the east [Avon Avenue under the railway line at Worcester Park], and Cuddington Recreation Ground - this is the only visible feed source of this arm of the Beverley Brook.
- The section 19 report produced by Surrey CC confirms that there are four such feeds.
- It has been made apparent to us by the Councils and the Environment Agency that there remains limited ability to address these feeds [excluding that of Cuddington Recreation Ground] since there is neither space for flood alleviation, nor resources to undertake much work, and therefore we trust the council will act defensively on flooding risks.
- Pictures of the Sir Joseph Hood Park & Marina Avenue, adjacent to the development site, following the 2021 floods and the flood warning issued are enclosed below to highlight these facts.
- This area does not stand alone or discrete from cumulative flooding risks that surround the Beverley Brook across adjacent areas in Surrey.
- This site is a source of flooding both further upstream and downstream due to hydraulic incapacity within the Beverley Brook during times of heavy rainfall. Incapacity is contributed to due to the manner of the brook's layout and lack of maintenance before and within this potential development site, hindering timely and efficient passage of water through the site at times.
- There is also the matter of the failure to build the flood plain at the Sir Joseph Hood Playing Field, first identified by The Environment Agency over 25 years ago.
- Flooding is further impacted by the addition of feed water to the Beverley Brook directly from the Hogsmill River where it passes The Hamptons development just prior to entering the Gasholders site. Whilst this flow is designed to supplement dry times it is also an unfortunate additional source of water during times of flooding, causing incapacity in Green Lan and flooding in Sir Joseph Hood Park and surrounding areas.
- The areas immediately north, south and east surrounding this development site flooded with fluvial and surface water in 2021 and additional dates:
 - o 2021 - 12 July 2021, 25 July 2021, 7 August 2021, 20 October 2021. A local newspaper report of the 2021 flood blamed a proportion of this flooding upon the development

- o of the Hamptons - another development by the same developer applying to you today.
 - o 20th July 2007. Flooding on this date was the subject of a petition to parliament. An Environment Agency flood alleviation plan and new flood plain was developed but this unfortunately failed to contain as much of the 2021 floods as should have been expected.
 - o 1931. Postcards were produced of the 1931 flood in Central Road Worcester Park.
- Worcester Park is listed by [the adjacent] Sutton Council as one of the top 5 Critical Drainage Areas in the borough. Surrey Council is considering applying the same classification [source Section 19 reports].
- The Environment Agency Report of July 2000 covering The Beverley Brook Flood Alleviation Scheme [outline environmental statement] has yet to be implemented. This reflects issues within this section of the Beverley Brook, impacted under this planning proposal. The EA consultant's recommendations in chapter 5 include:
 - o 5.7 West Barnes Lane – address localised flooding by raising the timber flood wall on right bank by 0.4m & notes it had then reached the end of its life, and the construction of a new flood wall.
 - o 5.8 Construction of a flood bank. The advice was to allow the Sir Joseph Hood Playing Field to continue to flood but construct a flood bank to the north edge to protect the local housing. Had this been implemented the devastation of 2007 and continued flood zone 3 in Marina Avenue would have been largely addressed.
- Pembury Avenue – recommendation of silt removal and flood wall construction. This included gravel removal to lower the culvert by 0.2m and raise banks on the right hand side by 0.3m by flood wall construction
- Any approved development on this site will attract S106 funds which should be urgently diverted to this long overdue work of a simple nature.
- This report is old so not online however it can be accessed from the Kingston Archive and we ask that it should be used to ensure a balanced objective in implementing flooding considerations. Some of the pertinent pages have been copied and can be supplied by the forum if requested by Kingston Council.
- LB Merton Section 19 report triggered by the 2021 confirms that the Beverley Brook was issued with a flood warning by the EA during the 2021 event and advises that the Beverley Brook's relatively small channel capacity is unfavourable for successfully managing increased flows in-channel, thus encouraging out-of-bank flows. The EA confirmed that fluvial floodwaters entered the area from the south, with the increased river volumes overflowing the channel banks and causing flooding to the Sir

Joseph Hood and Marina Avenue area. One of the recommendations of action that appears to remain outstanding is that the Environment Agency should request access from National Rail to survey the section of main river culvert at the western edge of the hotspot that is located below the railway line to enable a full survey to be undertaken, thus helping to identify any potential issues that could be causing or compounding flooding to this location.

The Worcester Park Flood forum requests Kingston Council should ensure that no development of this land should progress until this survey is undertaken and the resulting recommendations are fully implemented.

- We have substantial concerns about the demolition and construction HGV traffic crossing the Beverley Brook:
- The suggestion that HGV lorries can safely cross this brook via Kingshill Road on an access bridge that is not designed or strengthened sufficiently for this purpose in order to remove the gasholders, then construct a new neighbourhood of five tall and substantial blocks of flats, potentially leaves local residents of Kingshill Avenue, Calverleigh Way, Risborough Drive, Hughenden Way exposed and facing the loss of access to their homes should this access route over the brook collapse. Sutton council have blocked any alternative access for traffic management purposes so this access must remain viable.
- Additionally any road collapse into the Brook would have the potential to immediately cause widespread flooding throughout the catchment area, nor would it be swift to repair.

flood-warning-information.service.gov.uk

Beverley Brook at West Barnes

Flooding is expected - immediate action required

River levels remain high but are beginning to fall as a result of localised thunderstorms earlier this afternoon. The risk of flooding remains for properties and roads close to the Beverley Brook in Motspur Park and West Barnes throughout this evening, 25th July 2021, and overnight tonight. Further light rainfall with isolated showers is forecast over the next 12 hours but this is not expected to be as heavy as the rain experienced this afternoon. Standing water may remain in low lying areas even after the levels in the river have fallen and the risk of surface water flooding continues. Our incident response staff are actively monitoring the situation. Please follow advice from emergency services and take photographs of any flood damage. This message will be updated by 8am tomorrow, 26th July 2021, or as the situation changes.

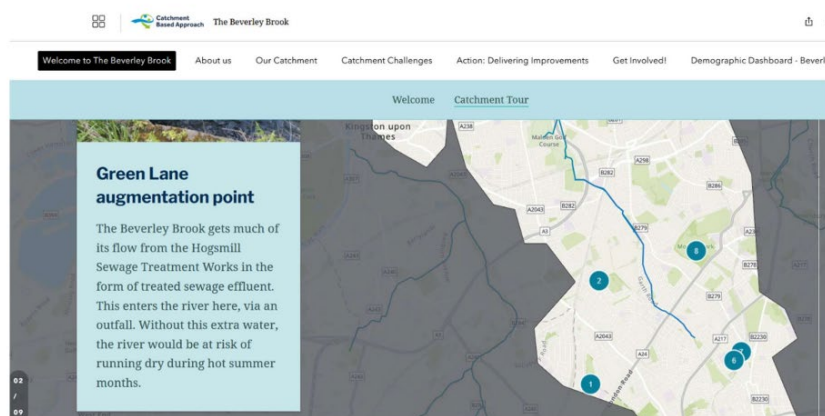
This information was last updated at **9:17pm Sunday 25 July 2021**

Could this information be better? [Tell us how to improve it.](#)





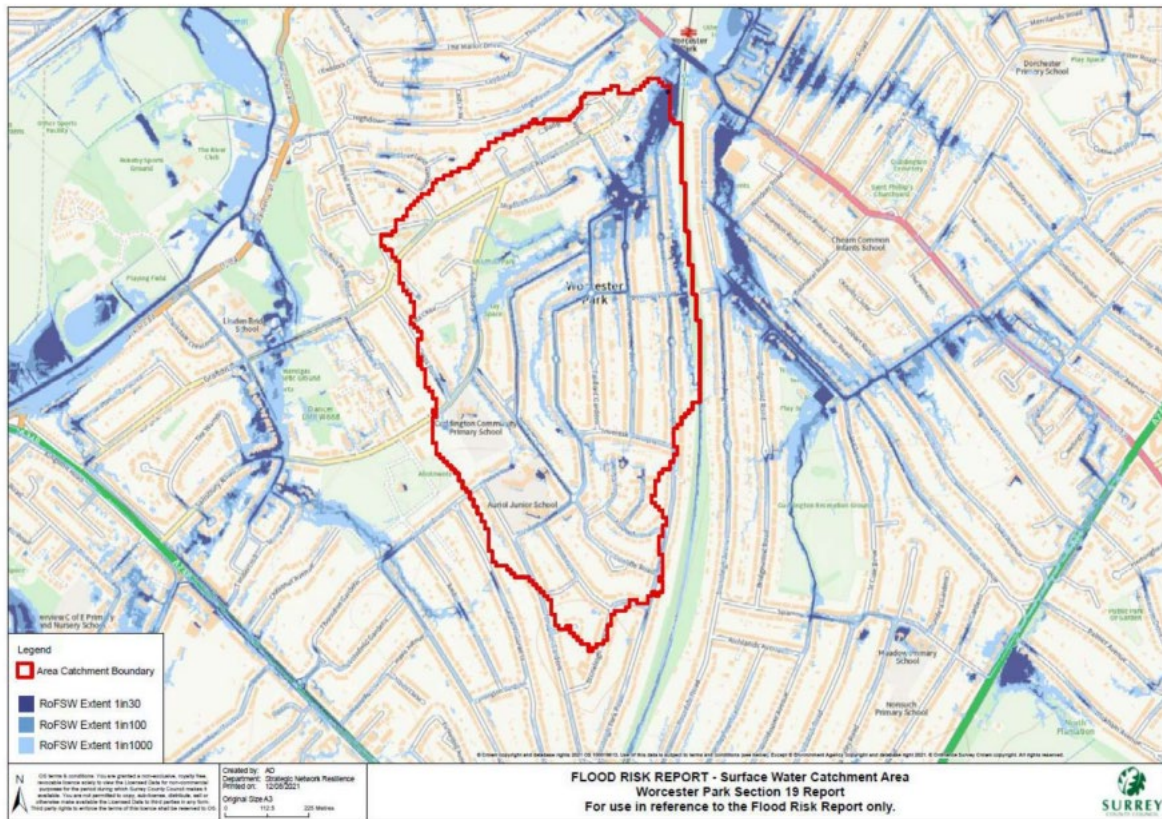
1. 2021 Flood warning and map 2. Land in the Joseph Hood Park adjacent to the children's nursery building 3 & 4. Both are Marina Avenue.



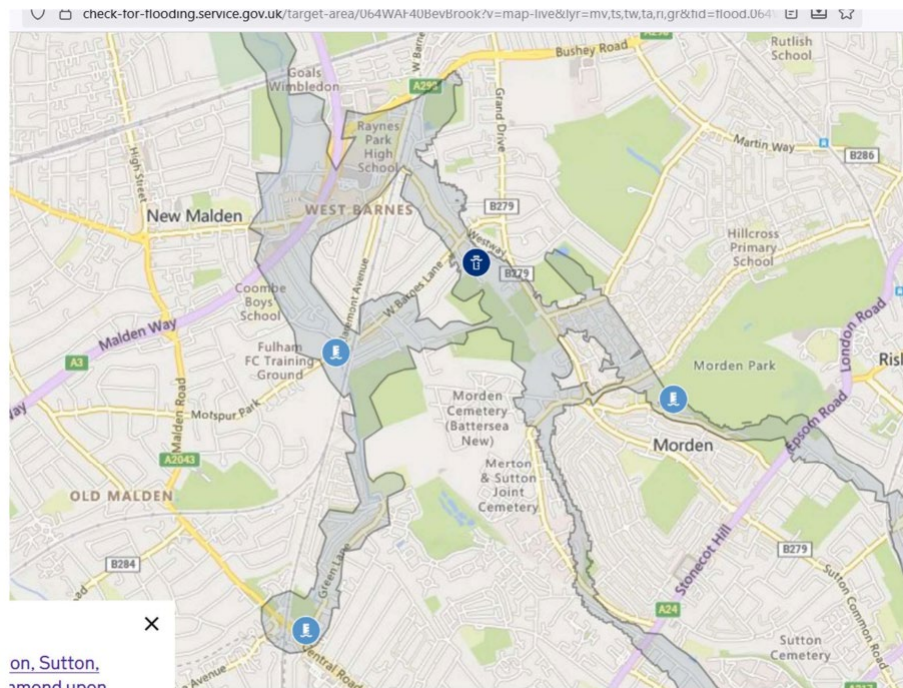
Source - Argis map of the Beverley Brook

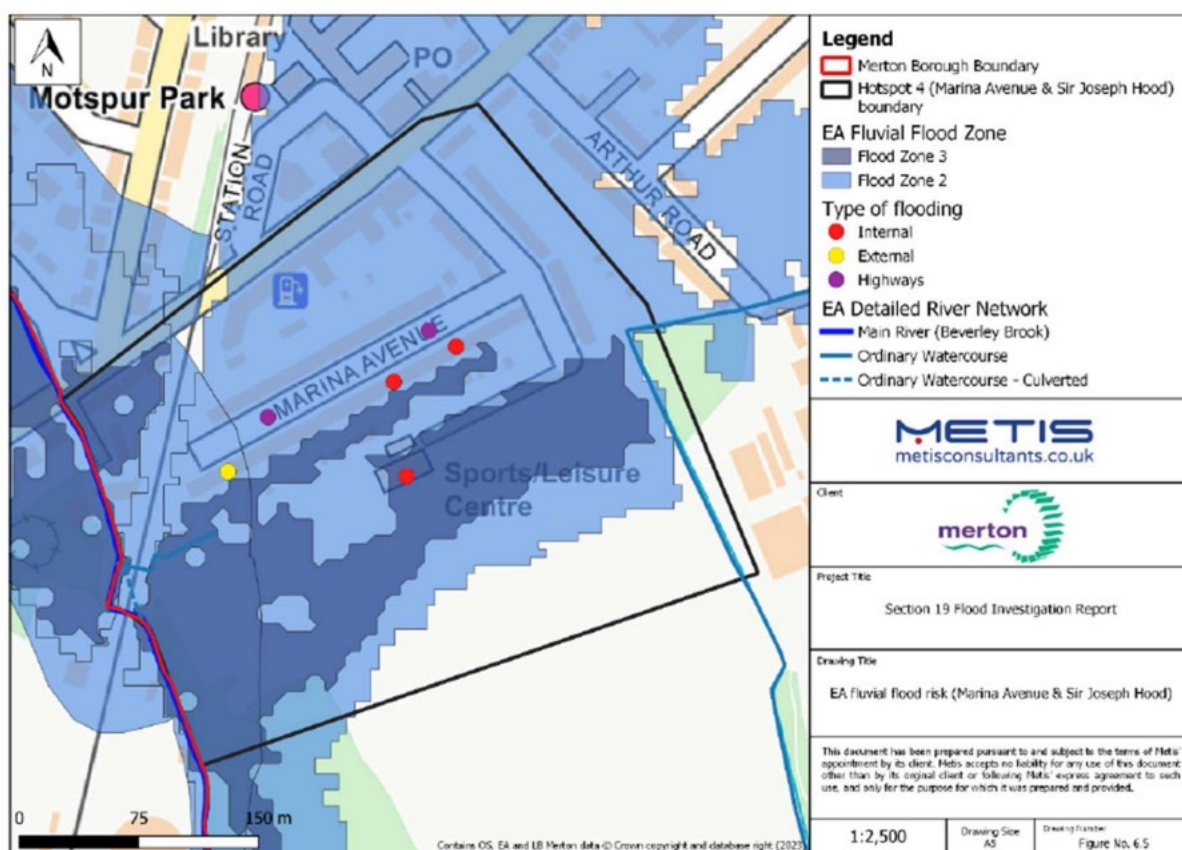


2021 1. Worcester Park Station 2. Old Malden



Worcester Park Surface flood risk, heading into the Beverley Brook from upstream - Source Surrey CC Section 19 report





Source 2025 – 1. check-for-flooding.service.gov.uk 2. LB Merton Section 19 report Aug 2023

5.1.9 **Wimbledon Swift group (19/11/2025)**

This is a request that the proposed largescale development will maximise its potential for building-dependent cavity-nesting birds. The development ought to include integrated swift bricks in the fabric of the buildings. Installation of swift bricks should comply with best practice guidance on densities and arrangement of swift bricks (1:1, swift bricks to residential units, and one swift brick per six square metres 2 on commercial buildings). For guidance on swift brick installation, please see CIEEM references below.

NB:

Provision of greenery, such as shrubs and trees etc, and other green features, does not offer nesting habitat to swifts.

Inclusion of artificial swift nest sites in new developments will not register a value on the Biodiversity Net Gain calculation.

UK Swifts, once common, are now on the 'Red-list' of conservation concern and are at risk of extinction in the UK. The loss of our swifts is believed to be due to the disappearance of their natural breeding habitat, ie, spaces in the lofts and walls of buildings, as a consequence

of building work. Modern replacement structures are highly sealed and lack the eaves access and small cavities used by swifts. Swifts are nest-faithful, and cannot switch to new nest sites (which are rarely available) at short notice.

There are still swifts nesting close to the location of this planning application, in the KT3 area. These nest sites have been recorded on the RSPB Swift Mapper website for conservation purposes. The established nest sites are at high risk of being destroyed as a consequence of building work, and replacement artificial nests are highly unlikely to be provided.

Swift bricks are considered as universal bird nesting features since other birds, such as the red-listed house sparrow, and members of the tit family, take readily to swift bricks. Swifts like to nest near other nesting swifts, and so clusters of swift bricks or boxes can be particularly effective.

A British Standard for integral nest boxes, BS 42021, was published on 30/03/22. The standard is aimed at building-integrated nest boxes for cavity nesting species, and planning authorities can specify compliance with the standards.

<https://knowledge.bsigroup.com/products/integral-nest-boxes-selection-and-installation-for-new-developments-specification-1/standard>

Applicable policy:

Policy:

Merton Local Plan 2024 2037/38

Policy O15.3 Biodiversity and access to Nature

15.3.19. (page 490):

'Development, particularly for new and replacement buildings and extensions to buildings, should utilise opportunities to attract new species to a site. This can include the incorporation of artificial nest boxes and bricks in buildings to provide nesting and roosting opportunities for birds, including species under threat such as swifts, house martins, swallows and house sparrows, and where appropriate, bats. Swift bricks integrated into new buildings are preferred, as these are suitable for multiple bird species. As outlined in the NPPG 2019 (para 023) these relatively small features can achieve important benefits for wildlife. Applicants will be expected to provide details of such features as part of planning applications and should refer to best practice guidance when designing a development, including that prepared by the Chartered Institute of Ecology and Environmental Management (CIEEM) and the British Standard BS 42021 for integral nest boxes'

National Planning Policy Guidance:

<https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf>

Paragraph 187 (d), page 54: 'Planning policies and decisions should contribute to and enhance the natural and local environment by...minimising impacts on and providing net gains for biodiversity, including by.....incorporating features which support priority or threatened species such as swifts, bats and hedgehogs'

References:

Best practice guidance on densities and positioning of swift bricks is explained below (1:1, swift bricks to residential units, and one swift brick per six square metres on commercial buildings)

The Chartered Institute of Ecology and Environmental Management Journal, Issue 104, June 2019: <https://cieem.net/resource/the-swift-a-bird-you-need-to-help/>

26/07/21: 'Swift Bricks: The 'Universal' Nest Brick – by Dick Newell': <https://cieem.net/swift-bricks-the-universal-nest-brick-by-dick-newell/> 4 https://swift-conservation.org/universal_swift_nest_brick02.pdf

5.1.10

Wimbledon Society

The main part of the application site is in the Borough of Kingston, with only a narrow access corridor being within the Borough of Merton. On the eastern edge of the site, the Beverley Brook forms the boundary between the two Boroughs, and on its eastern bank in Merton is a deeply wooded and nature-important SINC area and the extensive Sir Joseph Hood playing fields, under the ownership of the Council.

The proposal shows the demolition of the gas holders, and the residential development of the site. The sole vehicular access is to be from the south, with a pedestrian and cycle path being created through the site. Much of the site is within an area with a “high probability of flooding” (Environment Agency 21:8:2025).

The Society does not offer any comment on the residential or urban design aspects of the project, which is left for others to consider. Our comments on the other major issues are as follows.

CONTAMINATION AND THE EFFECT ON THE BEVERLEY BROOK:

From examples of similar sites, it is likely that the whole development site is highly contaminated with toxic and dangerous chemicals, and will need to be remediated before any development could take place.

Such remediation is a highly specialised operation, and could carry substantial environmental risks. In particular, spillage into the Beverley Brook during these operations would be very damaging to the overall health of the water body, to the nature site adjoining, and indeed to the whole of the downstream river through Motspur Park, West Barnes, Raynes Park and including the Common. Accordingly it is strongly suggested, no matter which development is approved in the future, that stringent remediation Conditions are an integral part of any permission,

together with a substantial financial bond, forfeited should any pollution event take place.

ALLEVIATION OF FLOODING:

As can be seen from the Maps produced by the Environment Agency (EA), the Beverley Brook is the source of potentially highly damaging flooding to substantial areas in Merton. Planning Policies for the alleviation of such flooding are integral to the NPPF, the London Plan, and to Merton's Local Plan.

Accordingly, any development of the gas holder site should incorporate and create suitable and extensive measures to hold back and regulate flooding flows. It may be that this need for land take could limit the area available for development. Such measures should have the aim of significantly reducing the extent of the EA's flooding maps, helping property owners downstream that currently have insurance risks.

Additionally, the Council should itself consider how it could significantly increase the holding capacity of future flooding on its own land, so that the downstream damage to property is minimised.

WATER QUALITY:

The Society does not have access to water quality information, but anecdotal and simple visual information seems to indicate that the current water quality is poor, and supports only very limited range of wild life.

Any development therefore would be expected to play its part in taking measures to positively improve water quality, and riparian vegetation, something that would have benefits for biodiversity and wildlife.

PEDESTRIAN AND CYCLE PATH:

The proposed pathway for pedestrians and cycles, following the eastern site boundary, would provide a link to Motspur Park Station and the local shops. Consideration should be given to making these links fully-open to the public, as they provide a route through between two areas that are currently poorly connected.

5.1.11

London Borough of Sutton (08/12/2025):

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.

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.

5.1.11

The Royal Parks (24/11/2025)

Richmond Park and Bushy Park are owned by the Crown, but TRP is responsible for their management on behalf of the Crown. The Parks are Grade 1 listed on Historic England’s Register of Historic Parks and Gardens, and include National Nature Reserve (NNR), a Site of Special Scientific Interest (SSSI), Conservation Area (CA) and a Special Area of Conservation (SAC) status.

One of TRP’s charitable objects is to protect and conserve the land under its management, and further, to maintain and develop the biodiversity of the Royal Parks.

Following a review of this planning application, TRP would like to make the following comments:

We have reviewed the documentation within the planning portal, in particular the Townscape and Visual Impact Assessment, and note that there are no AVR images shown as views from either Bushy Park or Richmond Park.

Could we ask for these views to be taken into consideration and for an updated Townscape and Visual Impact Assessment to be forwarded for review and comment.

We trust that you will take on board our comments, and welcome discussion and the opportunity to comment on any future proposals

Officer comments:

For information purposes - The closest part of Richmond Park is 4.7km from the site. The closest part of Bushey Park is 4.9km from the site.

The matter of the visual impact when viewed from The Royal Parks would be a matter for consideration by RBK.

5.2 **Internal consultees:**

5.2.1 **LBM Planning Policy (social and green infrastructure)**

No comments received.

5.2.2 **LBM Planning Policy**

No comments received.

5.2.3 **LBM Environmental Health (Contaminated Land) (01/12/2025)**

Thank you for the mail. Am unsure the relationship between LB Merton, who don't have the site in our borough and RB Kingston. For one, the EA should be informed about this planning-app.

Odour risk from the ground

Early indications are that the contaminated land officer at RB Kingston is quite good, so I'm hopeful that they will manage away any problems with good planning-conditions. Meaning proactively demand odour management of any works that move soils or gasplant residues. It's preparatory movements, and ground movements (aka groundworks) that hold all of our risk, as neighbours. If the CLO does nothing, and conditions don't go on, that could be bad, and we in Merton could get loads of difficult complaints. They really should be recommending the full conland conditions. If they don't, then they could find that they have an uncontrollable odour problem, for which we're first in line, downwind of the prevalent wind direction. From our perspective, we'd have an obligation to at least forward complaints to RB Kingston, and we'd have some obligation to do that, within some timeframe. The sort of odour complaints we envisage from our residents could rattle around various departments in our council before they come to me, in conland. That's merely how odour events from gasplant redevelopments occur. Residents don't know to whom to complain, and complaints can escalate, and fairly(justly), very quickly during times where our teams aren't on shift.

The best-case scenario is if we don't get any complaints. Though to say we cannot tolerate any might be unhelpful for the greater good. To set up a perfect odour management system could be extremely expensive. Is this enough for you? Are you OK if I forward this to the contaminated-land officer at Kingston
rachel.terlinden@kingston.gov.uk?

Ideally the works should be conducted in the dead of winter, when residents have their windows shut and no out of hours working allowed on the ground disturbing part of the works. The site have a dedicated environmental manager and odour suppression well planned, and functional before work commences.

5.2.4 **LBM Transport Planner (09/12/2025)**

- Swept path drawings to indicate if turning left out of the northern access would be feasible.

We are looking at the potential benefits of the left turn out of the site, in terms of reducing the construction impact on a number of predominately residential streets in the borough.

If this tracking doesn't work and they need to maintain left turn entry from the north via West Barnes Lane we need full tracking movements based on their proposed construction routing (presumably from A3). West Barnes Lane is pretty narrow in places due to on-street parking, so they may need to consider temporary waiting restrictions for the duration of the build.

- Restrict delivery times between 07.00 to 09.00 and in the afternoon 15.00 to 19.00. - Agree

Will update on permeability in due course.

5.2.5 **LBM Transport Planner (17/12/2025)**

Our comments are as follows:

- Additional link across the Joseph Hood memorial Playing fields in addition to Marina Avenue route.

Transport support this in principle and raises no objection subject to providing more prominent gateway entrances and ensuring personal safety . Details to be submitted before determination.

- Revised Swept Path Analysis. NORTHERN SITE ACCESS ARRANGEMENT – ENTERING

Appears to encroach on to opposite traffic lane when large construction vehicles (16.5m and 18.0m) entering the northern access. Can the applicant address this and provide the tracking plan in CAD.

Applicant to demonstrate that it is not possible to turn left out of the site.

- Ped crossing: Further internal discussions needed for the proposed crossing.
- Station Road: Further internal discussions needed.

- Network Rail and South Western Railway should be consulted as it has an impact on the operation of railway.

Need to understand who will be responsible for Improvements to the station.

5.2.6 **LBM Transport Planner (16/01/2026)**

Further to our meeting on 13th January 2026, please see LBM Transport comments for further consideration.

In order to mitigate the impact of the scheme, LBM Transport will be seeking the following contributions:

1) Pedestrian Crossing Contribution

We agree with the principle of providing a crossing facility on West Barnes Lane to support people moving between the site and the station, but the proposed design, as submitted by the applicant, needs to be further considered by our highways team and is unlikely to be suitable.

We would like to secure a contribution for the implementation a suitable crossing facility that will be designed and implemented by Merton's highways team. This will enable the council to evaluate key factors including pedestrian / traffic volumes, accident history, traffic speeds, road widths and relevant local factors to help determine the optimum location and design solution.

Contribution: £100,000

2) Cycle and Walking Contributions

We agree with the principle of improving cycling and walking infrastructure in the vicinity of the development site but are not able to commit to any specific scheme designs at this time, due the need to undertake further site assessments, local engagement and statutory consultation. To this end, we would like to secure a contribution towards walking and cycling improvements on West Barnes Lane and Station Road that will be designed and implemented by Merton's highways team.

Contribution: £150,000

3) Controlled Parking Zone Contribution

Financial contribution towards investigation, consultation, and potential implementation of a Controlled Parking Zone within the London

Borough of Merton on those roads that could potentially be impacted by residential parking demand from the development.

Contribution: £50,000

4) Construction Access

LBM (Transport) is concerned with the use of a banksman to control traffic in the area, with the potential for traffic to be halted west of the level crossing when vehicles are approaching.

These issues need to be resolved at a planning stage, and we would like to see a design solution that addresses this. This may need to include changes to the existing highway layout within the vicinity of the site to better facilitate the movement of vehicles. Full details of the changes to the entry point to the site should also be provided to show any changes to junction radii and measures to maintain safe pedestrian movement across the junction.

We also need to understand the routing of construction vehicles from the Strategic Road Network.

5.2.7 **LBM Transport Planner (03/02/2026)**

LB Transport would like to request a further £50k, in addition to the £200,000 as set out in your response, to mitigate the impact of the proposals.

It is anticipated that the new pedestrian crossing could potentially cost in the region of £100,000, particularly if it's necessary to change existing highway arrangements and reposition the existing bus stop. This would only leave £50,000 for further sustainable transport initiatives to improve conditions for walking and cycling to and from the site to Motspur Park Station and on West Barnes Lane within the local vicinity. To this end, we seek to increase the sustainable transport figure to £100,000, resulting in an overall transport package of £250,000 (£100K from new crossing on West Barnes Lane, £100k for local walking and cycling improvements, £50k for CPZ).

White line hatching as an alternative to banksmen – need a plan showing the proposed safe access arrangements including white line hatching.

5.2.8 **LBM Environmental Health (Contaminated Land) (11/12/2025)**

The addition doesn't change anything for me. As mentioned, I'd like to approach my counterpart at RB Kingston rachel.terlinden@kingston.gov.uk to futureproof Merton and the development as best we can. OK?

5.2.9 **LBM Air Quality Officer**

No comments received.

5.2.10 **LBM Environmental Health (Noise and Nuisance) (22/12/2025)**

Should you be minded to approve the application then I would recommend the following planning conditions:-

1) Due to any potential impact of the surrounding locality on the development the recommendations to protect noise intrusion into the residential dwellings as specified in the Volume 1: Main Environmental Statement shall be implemented as a minimum standard.

2) A post confirmation noise survey shall be undertaken following completion of the development to ensure the specified levels are achieved, if not achieved additional mitigation shall be installed to the levels are achieved before use.

3) Noise levels, (expressed as the equivalent continuous sound level) LAeq (15 minutes), from the mechanical plant shall not exceed LA90-5dB at the boundary with any residential property.

4) Any external lighting shall be positioned and angled to prevent any unnecessary light spillage or glare beyond the site boundary and comply with Institute of Lighting Professionals Guidance Note 1/20.

5) The Demolition and Construction Environmental Management Plan submitted to, the local planning authority shall be adhered to throughout the demolition and construction period.

Reason: To protect the amenities of the occupiers in the adjoining residential premises and future occupants.

5.2.11 **LBM Highway Authority (04/02/2026)**

From a cost point there does not seem any amounts put in for the Highways maintenance implications of the construction vehicles from this site using the highway network, especially as the majority of their routing is on West Barnes Lane which has speed tables

We would be looking at the additional maintenance that would have to be carried out on these roads due to the impact of additional heavy traffic and would request that a potential cost is minimum of 50K and the reality of new surfacing/patching would be 100k.

5.2.12 **LBM Highway Authority (17/02/2026)**

We would request a Highways contribution due to the high amount of large and heavy additional construction traffic that will be using the route from Burlington Road into the site of 75k.

These roads are not constructed to take this quantity of larger traffic compared to Burlington Road, and will cause short and long term changes to the structural condition of the asset, which will involve additional maintenance requirements not just over the course of the construction programme but longer term maintenance requirements on the structural integrity of the carriageway asset

Full Highway condition surveys are carried out each year on all of Mertons Roads and the deterioration will be clearly identifiable

The contribution would be to ensure all identified defects are repaired during the course of the works and major works to restore the structural integrity of West Barnes Lane is carried out following the site completion

Initially it may be better to put into the S106 with the other costs

5.2.13

LBM Education (Head of Contracts and School Organisation)
(06/02/2026)

We have run the DfE pupil yield calculator based on the breakdown of units and it comes out as:

Overall	Total units	Nurs	Pri	Sec
Totals	586	18	58	30

This would not justify a new primary school but could potentially contribute to the expansion need of an existing school. However, given the current position of falling primary school rolls this would not be needed in Merton as there are vacancies in the four nearest primary schools. However, all these schools are at least 0.8 miles straight line distance from the site and there are 5 mainstream state funded primary schools in other LA areas that are closer *

Therefore, the response from Kingston Council will be more relevant. I have liaised with my equivalent in Kingston and I understand two of the local school have capacity, but noting this can change in the time a development comes to fruition.

With regard to secondary schools, with falling rolls also projected over the next 10 years the increase in demand from the new development would not require a specific school expansion project from the 30 children projected.

* Schools within 1 mile straight line distance from nearest post code KT4 8DB

Green Lane Primary and Nursery School
Green Lane, Worcester Park, Surrey, KT4 8AS 0.23 miles

Dorchester Primary School
Dorchester Road, Worcester Park, Surrey, KT4 8PG 0.68 miles

Malden Manor Primary and Nursery School
Sheephouse Way, New Malden, Surrey, KT3 5PF 0.77 miles

Cheam Common Infants' Academy
Balmoral Road, Worcester Park, Surrey, KT4 8SS 0.82 miles

Burlington Infants and Junior Schools
Burlington Road, New Malden, Surrey, KT3 4LT 0.86 miles

St John Fisher RC Primary School
Grand Drive, London, SW20 9NA 0.86 miles

Sacred Heart Catholic Primary School
Burlington Road, New Malden, Surrey, KT3 4ND 0.87 miles

Aragon Primary School
Aragon Primary School, Aragon Road, Morden, Surrey, SM4 4QU 0.9 miles

Cheam Common Junior Academy
Kingsmead Avenue, Worcester Park, Surrey, KT4 8UT 0.94 miles

5.2.14 **LBM School Travel Plan Officer**

No comments received.

5.2.15 **LBM Tree and Landscape Officer**

No comments received.

5.2.16 **LBM Greenspaces Team (21/11/2025)**

We have had some discussions with the developer and costed up a few projects as follows:

MUGA Replacement – Approx £150k

The proposal includes the replacement of two multi-use games areas (MUGAs). Based on recent comparable projects, I would anticipate an overall cost in the region of £150k, covering full resurfacing, new fencing, line marking, drainage improvements, and upgraded LED

lighting where appropriate. This sort of level would give a good community-level specification suitable for football and basketball use (as this is already catered for on-site).

Splash Pad Installation - Approx £300k

A new splash pad, similar in scale and character to the facility at Wimbledon Park or Tamworth Rec, would be expected to cost in the region of £300k. This would provide a high-quality and fully accessible water play zone incorporating a mix of ground jets, interactive features, filtration and plant systems, safety surfacing, and all necessary drainage and water management infrastructure.

Play Area Replacement – Approx 250k

A complete replacement of the existing play area, including new equipment, surfacing, landscaping, and seating, would likely fall in the region of £250k. This estimate reflects a comprehensive renewal providing a modern, inclusive play offer for a range of age groups, a lot of the current equipment is nearing end of life, so this one would be a priority.

With all the above I would allow a 10% inflation increase figure and further 8% for idverde management fees.

MUGA – £150k
Splash Pad – £300k
Play Area - £250k

Total - £700k
10% inflation £770k
8% idverde fee £831,600

The other things to add that we haven't costed up that would be really beneficial is improving the pathways around the park. This has been flagged by the local Friends Group too.

5.2.17 **LBM Greenspaces Team (24/11/2025)**

Additional suggestion that paths around the park also be resurfaced:

- It would be improvements to existing pathway and all of it would need resurfacing.

5.2.18 **LBM Waste Management (28/11/2025)**

There will be no comments from Waste in relation to this planning application. It is out of borough and the access for waste collection access will not impact Merton.

5.2.19 **LBM Public Health**

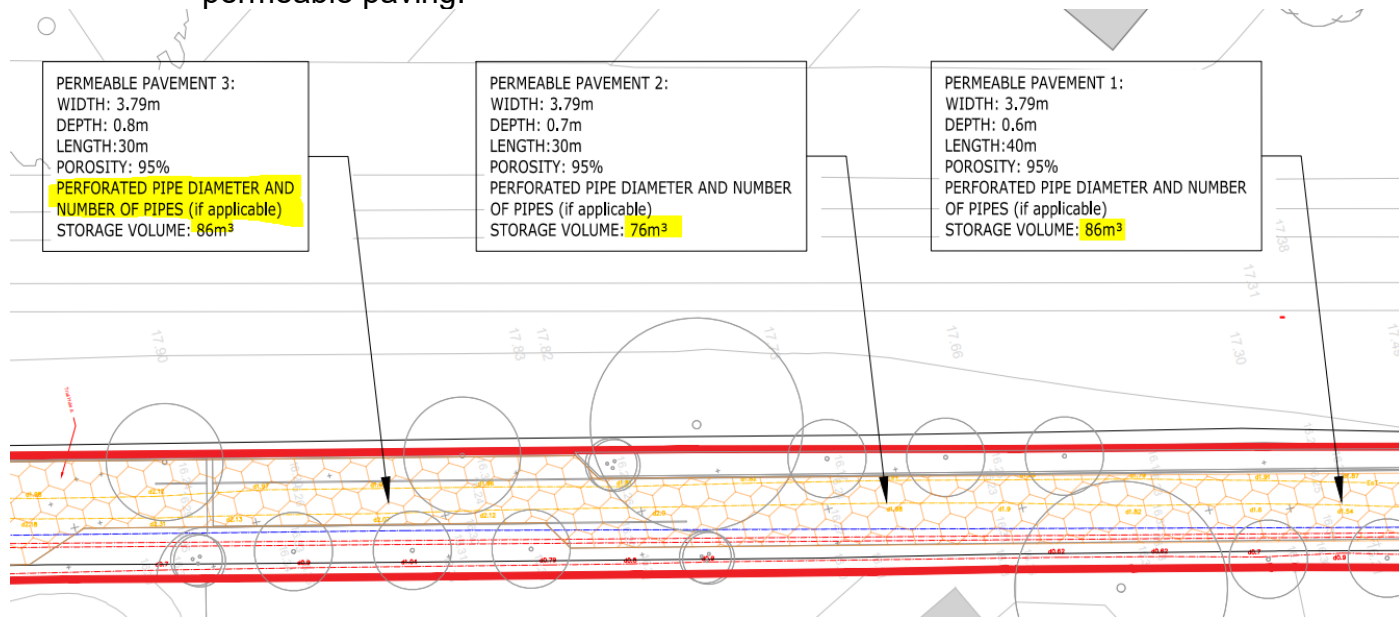
No comments received.

5.2.20 **LBM Flood Risk and Drainage Officer (22/01/2026)**

I've now reviewed this application as it relates to the areas within Merton. One thing of note that they did omit was on the history of flooding. This site flooded in part on July 12th 2021.

Comment on the Drainage strategy for the north access road within Merton's boundary:

The preliminary drainage drawing U096-RAM05-XX-00-DR-C-655-105 Rev: P01 shows a couple items I'm not clear about. First the excerpt below indicated that it's not yet determined if they propose a perforated pipe within the makeup of the permeable paving sub-base. Please let the applicant know that this is a compulsory requirement of permeable paving.



Second, in line with the permeable paving, the applicant will need to provide details of where the perforated pipe will connect to the rest of the site's drainage system or be discharged to the river. In the case of the latter, they will need to apply to the Environment Agency for a Flood Risk Activity Permit.

The third item of note is that there seems to be a very high surface water storage volume proposed with the permeable paving for this access road. The approximate area of this access road is 1300m² (0.013Ha) and it appears that the storage is more than the rain falling on the roads. In the report they have combined the northern and southern access roads as one catchment (very baffling given one is in Sutton and one in Merton). We need to see the figures for the northern

access to the site separately to ensure that the mitigation proposed is accurate for that section of the development, resulting in no flooding.

5.2.21

LBM Urban Design Officer (20/11/2025)

Planning Brief:

This site is outside the borough except for the northern access, and is not included as a Site Allocation in the Merton Local Plan

Site Layout and Strategic Response:

The site layout proposes a line of four tall buildings along the western edge of the site. These will present a long line of built development that will be very visible as a wall of development from the Joseph Hood Memorial Playing Fields and introduce a highly urban form into the surrounding landscape. It is suggested that a more random arrangement of buildings on the site, along with more variety in heights – including having single buildings with two different heightened elements, should be considered. This would create a ‘cluster’ rather than a ‘wall’ of development.

The site has tortuous access routes which are long and not overlooked. This gives rise to issues of safety and security, especially for walkers and cyclists. It is unclear what means are being employed to mitigate against this and ensure these routes feel and are safe.

Form and Massing:

Buildings have a large footprint and this adds to the ‘wall of development’ feel. Smaller building footprints and more variety in heights will break up this massing and add visual interest from longer views.

Elevations and Materiality:

The elevations are very two dimensional – as shown by section drawings. This will be noticeable from the mid distance as well as close-up. More modulation and 3D detail is needed to provide visual interest, texture and allow the play of light and shade on the elevations. Currently they are very bland with the only variations in the brick detailing. There is little to define a clear base, middle and top and the projecting balconies will be essentially unusable and will undermine the architecture. Enclosed balconies should be explored, which is a better and entirely feasible method for taller buildings.

Landscape and Public Realm:

The central public space is not well defined and is small within the open space. There could be larger gaps between the buildings to give

the development more of a parkland feel of buildings sitting within a park, rather than left-over space around large buildings. Parking in a single line is supporting the building arrangement for convenience and this is a rigid arrangement. The railway needs a spatial barrier, but this can be used as meaningful open space. If parking was scattered around the site it would become less intrusive and use of ground floor parking courts for some of the building footprints could also aid creating more green space. It important that there is a through route through the whole of the site for pedestrians and cycles as connectivity in this wider area is very poor.

Internal Layouts:

Internal layouts should aim for 'best practice' rather than just the bare minimum, as well as arranging internal areas to maximise internal privacy and safety. Internal balconied should be provided and should be additional to the internal dimensions.

Sustainability:

Refer to Climate Change Team

Next Steps:

Suggest changes to RBKOT.

5.2.22 **LBM Tree and Landscape Officer (24/02/2026)**

There seems to be minimal impact on Merton's side. I have no objections to the proposed scheme where it relates to Merton's side. I would suggest attaching conditions F5 (tree protection) and F8 (site supervision).

5.3 **External consultees:**

5.3.1 **Transport for London (20/11/2025)**

I write to provide detailed strategic transport comments on this application reference 25/P2859. These provide more detail on the matters raised in the GLA Stage 1 Planning Report 2025/0919/S1. Please note that these are additional also to any response you may have received from my colleagues in infrastructure or asset protection and from TfL as a party with a property interest.

TfL expects all current planning proposals to consider the policies set out within the London Plan.

Development Overview

The proposed development is a residential scheme comprising the following:

- 586 Residential units
- 35% affordable tenure
- 89 car parking spaces.
- 1035 long-stay cycle parking spaces, and 28 short-stay spaces.

Site Location and Context

The proposed development is located on Motspur Park Gas Holders Site. The site is bound by the Beverley Brook and adjacent woodland on the eastern boundary, a South Western Railway (SWR) line on the western boundary and existing residential areas to the north and south of the Site. The closest section of the Transport for London Road Network (TLRN) is the A3 Malden Way which is approximately 700m north of the site. The application site has a public transport access level (PTAL) range of 0 to 2, on a scale of 0 to 6b where 6b is highest.

Whilst the majority of the site is located within the RBKuT, the site access on West Barnes Lane falls within the London Borough of Merton. The London Borough of Sutton sits immediately to the south east of the site, although not within the red line boundary.

Healthy Streets and Vision Zero

As identified in Policy T2 of the London Plan, all developments should seek to deliver improvements that support the Mayor's Healthy Streets approach. The TA includes an Active Travel Zone (ATZ) Assessment of 10 routes at both daytime and night-time.

The ATZ assessment identifies some key public realm areas of concern from a public safety and inclusive design perspective. Given the Mayor's commitment to safety of women, girls and gender-diverse people, we urge the applicant to work with the borough to address these as a priority.

TfL requests that improvements to pedestrian and cycle access at Motspur Station are treated as key objectives in any S106 agreements. The implementation of a crossing over West Barnes Lane and cycle lanes including a contra-flow lane on Station Road would significantly improve the routes to the station. Cycle infrastructure along Motspur Park should also be prioritised.

TfL will support LB Merton in securing contributions/works in kind to deliver improvements to support the 10 Healthy Street indicators and will further encourage active travel in line with London Plan policy T2.

Access

TfL have safety concerns regarding the accesses to the site. Access to the site is via two long narrow lanes with minimal natural surveillance making it challenging from a personal safety perspective, especially at night-time. The applicant should provide further mitigation to address this. In line with mayoral policy, particular consideration needs to be made of the impact on women, girls and gender-diverse people. At present, there is insufficient evidence that this has informed the design.

Strategies to mitigate this could include:

- Additional ingress/egress points from Sir Joseph Hood Memorial Playing Fields and Kingshill Avenue.
- A more decisive and open connection between Marina Avenue and the northern access, with a commitment to maintaining vegetation in this area to maximise visibility and personal safety.
- Treating street entrances to the access routes as more prominent gateways.
- Encouraging local people to walk through the site.
- Keeping proposed planting at low level (below 600mm), avoiding large shrubs that provide places to hide and shadow pedestrian areas.
- Providing consistent, dedicated street lighting (not highway lighting).
- Regular maintenance of planting, including vegetation outside the red line, to avoid overgrown planting encroaching on the pathways – which will need to be agreed with adjacent landowners.

To support active travel and access to public transport, it is important that the new southern access road to Kingshill Avenue feels safe, which will be challenging because of its isolated nature. While it is encouraging that the design intent is for pedestrian and cycle priority, and to keep speeds down, this is unlikely to be achieved in practice through the proposed highway infrastructure measures. The use of localised narrowing and one-way priority working is likely to cause issues for cycles as drivers seek to overtake before the narrowed sections. Drivers also often fail to give way for cycles in such scenarios.

The junction between the access road and the part of Kingshill Avenue leading to the roundabout also needs to reflect the proposed priority of active travel. Further consideration needs to be given to safe pedestrian movement in and out of the access road.

The main concerns with the West Barnes Road access are:

- Clear sight lines and personal safety – planting should be low-level.
- Path width – these should be 4 metres minimum width but ideally wider.

- Consistent lighting.
- Fencing and surfacing materials, which should reflect the new status of the path as an access to a residential site.

Car Parking

Car parking will be provided at a ratio of 0.15 spaces per dwelling, which equates to a total of 89 car parking spaces and is compliant with London Plan policy T6 part D.

Provision has been made for 3% of dwellings provided with a blue badge space (18 spaces) from the outset and should the demand arise, for the further 7%.

20% of the total parking provision will have active Electric Vehicle Charging Points (EVCP) installed – equating to 18 bays. The remaining 80% will be equipped with passive EVCPs to accommodate for future demand. This is compliant with London Plan policy T6.1 part C.

A Car Parking Management Plan should be secured by condition.

Cycle Parking

The applicant has proposed 1035 long-stay and 28 short-stay cycle parking spaces, this quantum is in line with London Plan policy T5 part A. Further information is required in terms of location of short-stay parking and quantities of the long-stay per cycle store.

Locations for short-stay parking should consider cycle deliveries and parking needs of cargo cycles and other larger models.

For long-stay cycle parking, provision in a series of small stores is positive from a security perspective, although robust and secure access arrangements will be needed for those stores accessed directly from the public realm.

Issues with the long-stay cycle parking proposals are as follows:

- Accessible cycle stands (enlarged Sheffield stands) should be located in each cycle store rather than concentrated in a few stores to avoid limiting the choice of those needing these stands. Standard-sized Sheffield stands may not be usable by some models, so some larger stands may be needed. Some people will struggle to get cycles into the upper tier, or own bikes (particularly children's bikes and some heavier models) that cannot fit in two-tier stands.
- Access to cycle stores from the carriageway should be direct and not obstructed by parked cars. Dropped kerbs must also be provided.

- Access paths must be wide enough for a person walking alongside their bike. Those paths should be paved along desire lines. This is not always – users of building B, for example, are likely to walk their bikes across the grass lawn to access the store.
- In some instances, cycle stands are positioned within cycle stores in a way that partly obstructs entrance doors.

TfL welcome that the cycle parking mix will be 75% two-tier racks, 20% Sheffield stands and 5% enlarged Sheffield stands to accommodate large or adapted cycles.

All cycle parking should be designed and laid out in accordance with the guidance contained in Chapter 8 of the London Cycling Design Standards (LCDS). This should be secured by condition.

Highways Impact

Due to the predicted vehicular trip generation TfL do not require highway modelling at this site.

TfL however request funding for a signal timing review for the SCOOT region, to investigate the potential for TfL to optimise the signals so that outside of the peak periods green time can be reassigned to the side roads helping to reduce traffic on Green Lanes. There may also be scope to give additional green time to Green Lane outside of peak periods.

Travel Planning

A site wide travel plan has been submitted and provides overarching travel planning strategy for the site and its proposed uses.

Detailed Residential Travel Plan should be secured, enforced, monitored and reviewed by an obligation in the s106 agreement.

Delivery and Servicing Plans (DSP)

A Delivery and Servicing Plan (DSP) has been provided as part of the planning application; this should be secured by condition.

The proposed servicing strategy is considered acceptable in principle and can effectively accommodate the projected trip generation without adversely impacting the surrounding road network and accords with London Plan T7.

The applicant should provide swept path drawings of the largest vehicle intended to access the development and utilise the loading bays and turning head.

Construction Logistics Plan (CLP)

An outline Construction Logistics Plan (CLP) has been provided. The full CLP will be required to be secured by condition and produced in accordance with TfL guidance. It should be noted that swept path analysis for the largest vehicle entering and exiting the site should be provided, along with location of traffic marshals, protection for vulnerable road users, CLOCs and FORS accredited vehicles.

Mayoral CIL

Mayoral CIL2 within the London Borough of Merton is payable at a rate of £60 per sqm.

Summary

In summary, the applicant should provide further detail regarding cycle parking and mitigation measures implemented to improve access arrangements.

I trust this provides you with an understanding of TfL's current position on this application and we would welcome acknowledgement from you that these comments have been received and are being considered. Please do not hesitate to contact me if you have any queries. I look forward to discussing these with you and the applicant.

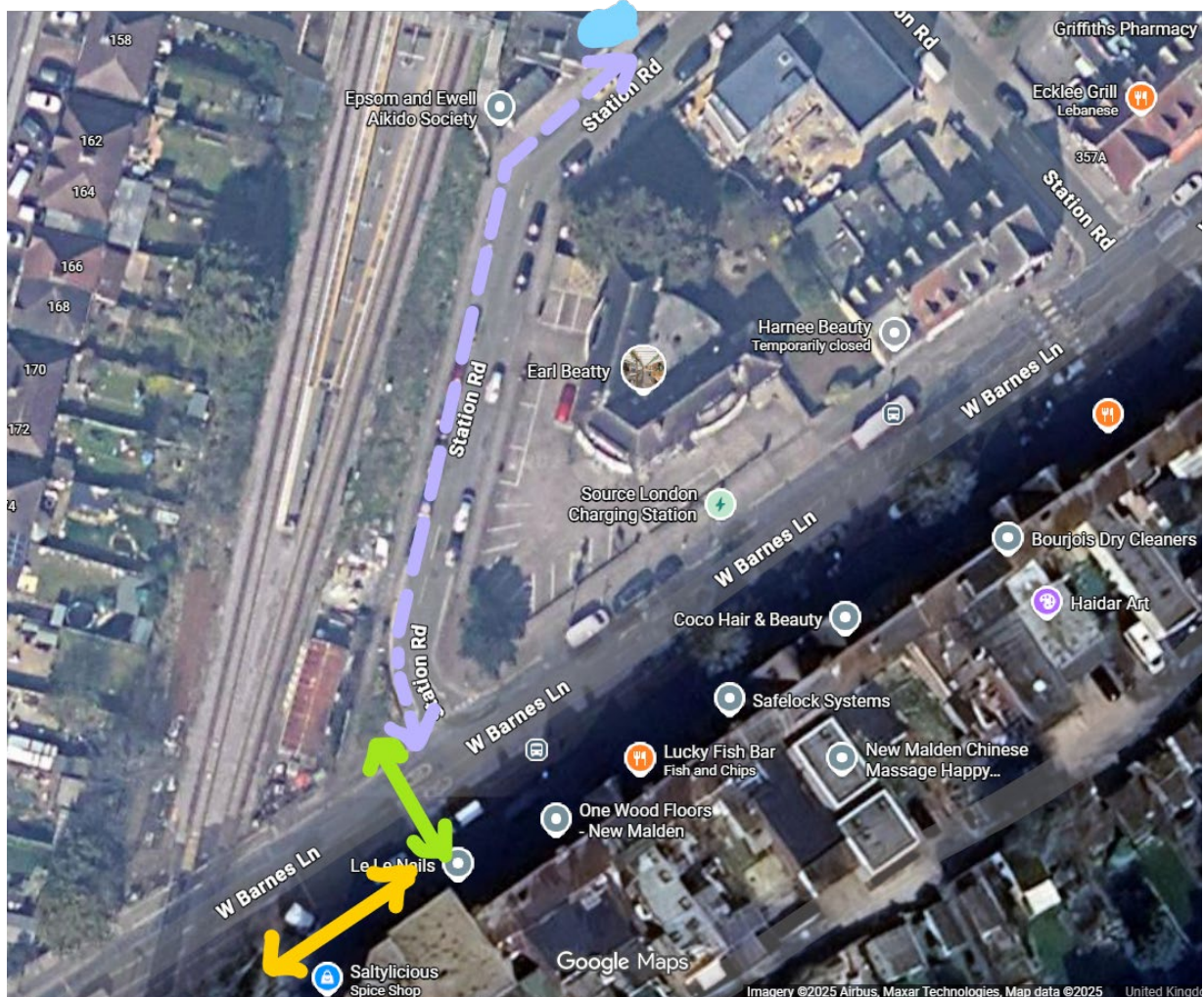
5.3.2 **Transport for London (02/12/2025) (Merton Case Officer comments in black, TfL response in blue)**

You mention the need for improvements to pedestrian and cycle access at Motspur Station, the implementation of a crossing over West Barnes Lane and cycle lanes including a contra-flow lane on Station Road, and cycle infrastructure along Motspur Park should be prioritised.

However, can you provide more details of these requested works, and indicate a financial figure for these contributions?

Diagrammatic sketches are provided below but these interventions would need to be designed by highways engineers, and this would be best done by Merton Highways team.

Safer pedestrian and cycle access from development lane to Motspur Station:



Green Arrow – Parallel crossing (belisha beacons and white line markings)

Mauve Dotted Arrow – Contraflow cycle lane on one-way street permitting cyclists to cycle against the flow of traffic – could be done with white line road markings and light segregation. No on-road parking would be permitted on west side of Station Rd – it's hard to see if cars shown on google are legally parked here now and this could have cost implications.

Blue Dot – Existing cycle parking

Orange Arrow – Level access, i.e. dropped kerbs or raised pavement to ensure accessibility for pedestrians, wheelers and cyclists from the north lane to the crossing point avoiding the railway level crossing area

Can you outline precisely what pedestrian and cycle access improvements are needed at Motspur Park station, so we can adequately include them in any s.106 agreement?

A very rough guess of construction cost in the region of approx. £150 – £200k + design fees. **To get a figure that could be used in s106 negotiations, a discussion with Merton Highways team is advised.**

There is a level crossing over West Barnes lane allowing traffic to pass over the railway line – presumably you refer to a pedestrian crossing to allow access from the site to the train station? If this is the case can you indicate what form of crossing you would expect to see, and locational details of where this should be sited – and any costs that should be sought by s.106 agreement for these works?

Pedestrian and cycle crossing, i.e. Parallel crossing - see above.

Can you outline to what extent any new contra-flow lane on Station Road should be, so we can see what works are involved. Are you able to provide costings for these works?

See map and included in above amount.

What cycle infrastructure along Motspur Park do you refer to? – if we are to include it in a s.106 it will need to be specific and concise and costed out.

Apologies, this should be West Barnes Lane (along the area of shops), not Motspur Park. Any design should come from Merton Council – Is there already plans for cycle infrastructure here? If not, this development could contribute to the feasibility and concept design stages of cycle infrastructure along the parade of shops on West Barnes Lane. Expect that £20k could go a long way. Again, a question for Merton Highways.

I appreciate the points you raise about the length of the access routes. Yes, this is a big concern. Currently there is a lot of discussion on women and girls' safety coming to the fore that previously hasn't been in the public debate. See attached documents from London Legacy Development Corp and London Cycling Campaign. You mention an additional connection at the Sir Joseph Hood Memorial playing Fields – but there is a connection here already – what changes were you looking to see to this? Apologies, if we missed a connection from the development into the playing fields but didn't see this – don't think this is referred to the Transport assessment. There is one from Marina Ave. (I follow the suggestion about widening the access into Marina Avenue and ensuring appropriate low level planting). What about adding more ways to get to the southern access road from Kingshill Ave? There appear to be two existing pedestrian routes, that currently look to be locked and are not mentioned in the Transport Assessment. See sketch below:

A related but different concern is the shared path width, in terms of cycling design infrastructure (LTN 1/20), a shared route pedestrian/cycle path is ideally 4m but can go smaller for pinch points, this is to avoid cyclists running into pedestrians; in this sense, what has been provided is acceptable.

You raise a concern with the fencing and surfacing materials of the path and say it should reflect the new status of the path as an access to a residential site. However, I am not entirely clear what you are looking for here. The path would be resurfaced with landscaping to the edges, there is signage and a new entrance feature (constructed from the previous gas holders) – can you further elaborate on the concern with the fencing and hardstanding?

It's good that the north and south access paths will be resurfaced. Will the existing fence along both sides of north and south access routes also be rebuilt? The routes are changing from unseen, occasional use routes to a new status as entrances to a residential development and the material of the vertical surfaces should reflect and enhance this changed condition. These routes will need to look like they are not just paths along the railway lines. Apologies if this has been addressed in the application.

You mention a concern with the sight lines from this access – however, it is an existing vehicular access and would only be a pedestrian/cycle access in the proposed plans (as well as emergency vehicle access) – what length of sight lines would be acceptable, as I can't follow the concern immediately here, given it is an existing access and not to be used for traffic.

[See documents](#)

I am keen to work with you to get these items included in the proposed development but we would need more detail as to the suggested improvements if we are to be able to justify them and identify costs to be secured by the s.106 agreement.

5.3.3 **Transport for London (19/01/2026) (in response to Officer query as to the layout of the northern access route and routes into Marina Avenue and SJHMPF):**

TfL are content with the design proposed, it has taken into consideration personal safety and security, lighting, cycle parking and landscape maintenance.

5.3.4 **Transport for London (29/01/2026) (following applicant's response to TfL comments):**

No further comments from me on this.

I am just waiting for the exact figure regarding the signal timing review contribution – will let you know when I have this, but I believe it should be in the region of £20k.

5.3.5 **Sport England (01/12/2025)**

Non-statutory planning advice

The proposed development does not fall within our statutory remit (Statutory Instrument 2015/595) and, therefore, Sport England has not provided a detailed response in this case, but would wish to give the following advice to aid the assessment of the application.

General planning guidance and advice can be found on our website: https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications

Loss of sports facilities

If the proposal involves the loss of any sports facility, then full consideration should be given to whether the proposal meets Paragraph 104 of the National Planning Policy Framework (NPPF), is in accordance with local plan policies to protect sport and recreation facilities, and whether it meets any approved Playing Pitch Strategy or Built Sports Facility Strategy that the local authority has in place.

New sports facilities

If the proposal involves the provision of a new sports facility, then consideration should be given to the recommendations and priorities set out in any approved Playing Pitch Strategy or Built Sports Facility Strategy that the local authority may have in place. In addition, to ensure 2 they are fit for purpose, such facilities should be designed in accordance with design guidance notes produced by Sport England, or the relevant sport National Governing Body.

Design Guidance notes: <http://sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Meeting the needs of new housing

If the proposal involves the provision of additional housing, then it will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then new and/or improved sports facilities should be secured and delivered in accordance with any approved local policy for social infrastructure, and priorities set out in any Playing Pitch Strategy or Built Sports Facility

Strategy that the local authority has in place. Our Sports Facility Calculator is a tool that can be used to estimate the additional demand for key community sports facilities from a new population and convert that demand into sport facility requirements with indicative costs. Guidance on how to use the tool is available on the link below.

Sports Facility Calculator: <https://www.activeplacespower.com/>

Other relevant guidance, tools and contacts.

Active Design

In line with the Government's NPPF (including Section 8) and PPG (Health and wellbeing section), consideration should also be given to how new development, especially new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing or assessing a proposal. Active Design provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section:
<https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance:
<https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design>

Planning conditions

We maintain a list of model planning conditions covering issues such as - creation of new playing field, compliance with design guidance notes, sports lighting and community use.

Community Use Agreements (CUA)

Central Government wishes to see the availability of sports facilities to the wider community when they're not being utilised by the main user, as they see schools being at the heart of local communities. To help with this ambition we have developed a template community use agreement.

Planning Conditions and Community Use Agreements:
<https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport/planning-applications>

National Governing Bodies of Sport

Although Sport England is not in a position to provide a detailed response on this occasion, where relevant you may wish to consider advice provided by recognised sport National Governing Bodies (NGBs), a list of which is available on our website using the link below:

NGBs: [https://www.sportengland.org/guidance-and-support/national-governing-bodies?section=expertise advice and tools-section](https://www.sportengland.org/guidance-and-support/national-governing-bodies?section=expertise%20advice%20and%20tools-section)

Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.

5.3.6

Third Party Ecologist (16/01/2026) (summary) – full report here: Regulatory Services Hub | Regulatory Services Hub | Application | 263475

We have carried out a review of the reports listed above. The ecological assessments and conclusions are largely in line with best practice, however, we note several areas where further information, clarification or a review of the assessment is required. A summary of the key points are presented below, with full details in the subsequent table.

- Full details of the timings of each breeding bird survey should be included. Clarification about the extent of the breeding bird survey should also be provided.
- Clarification is required regarding the assessment of potential impacts on Wimbledon Common SAC and Richmond Park SAC (Special Area of Conservation) and the consistency between the ecology ES chapter and EclA.
- The Biodiversity Net Gain (BNG) assessment, EclA and ecology chapter of the ES cannot be fully assessed without a full post-development habitat plan. The black and white draft landscape masterplan does not provide sufficient details.
- The justification for the lack of recommendation for a reptile translocation should be provided.
- The lighting levels appear to be higher than recommended under best practice guidelines within sensitive areas.
- Further evidence of the lack of the existing buildings' suitability for roosting bats should be provided.
- The assessment of the lack of hydrological impacts on Sir Joseph Hood memorial Wood Local Nature Reserve (LNR) should be justified.
- Kingfisher were noted during the breeding bird surveys, but not included on the figures or assessment. Further details are required.
- Several condition assessments do not appear to fully align with the associated text.

- The construction period predicted in the EclA is not reflected in the BNG assessment.
- No rationale for the strategic significance assessment is included.
- The classification of green roofs as open mosaic habitat is not appropriate.
- The trading rules have not been met for the development.
- The ecology ES chapter states that “The majority of the trees on site appeared to be recently felled”. This is not addressed within the BNG assessment.

In light of the issues noted, our recommendation is that further information is required.

Report	Comments	Policy
EclA	The timings of the dawn and dusk bird survey should be provided. The breeding bird survey results shown in Figure 3-4 extend well beyond the site boundary, including mallard and moorhen territories within gardens, which is unlikely. These drawings also include wren and wood pigeon, which are stated to be excluded (4.3.20). Clarification regarding the extent of the breeding bird survey should be provided.	• National Planning Policy Framework 2024 (NPPF) • Natural Environment and Rural Communities (NERC) Act 2006 • Wildlife and Countryside Act 1981 • Conservation of Habitats and Species Regulations 2017 as amended (Habitats Regulations) • Adopted Local Plan Policy O15.1 and O15.3

Report	Comments	Policy
	Due to the presence of breeding peregrine in the years preceding 2025, peregrine mitigation would be appropriate. This could include an assessment of the area surrounding the site, if there is no suitable on-site potential. Wimbledon Common SAC and Richmond Park SAC are considered within the ecology ES chapter, but not within the EclA. Clarification regarding the approach to assessing potential impacts to these sites should be provided. There is a risk of slow worm (and common lizard) mortality during the construction process. From the information presented, there is not evidence that slow worms will be able to disperse to safe areas from habitat manipulation alone (e.g. from the centre of the site to retained areas in the south) and translocation is likely to be needed. Justification is required for the lack of reptile translocation proposed. It is not possible to fully assess the suitability of the proposed approach without a more detailed post-development landscape plan. The Ligman downlights are over the 2700K recommended by best practice guideline. The lux levels are stated as being of ‘1 lux or below, along important commuting features’. This is higher than recommended under best practice guidelines (0.2 lux on the horizontal plane and at or below 0.4 lux on the vertical plane). Further, the lighting proposed along the two access roads and the network rail boundary in the west will increase lighting levels along previously dark corridors. The presence of myotis and brown long eared bats highlights the importance of retaining these dark corridors. The lighting strategy should be reviewed to minimise lighting in key areas.	

Report	Comments	Policy
	Bat boxes are only proposed on trees, these should also be integrated onto the buildings. There appears to be potential for impacts to trees along the northern and southern access roads from lighting and pruning to facilitate access. These factors could impact any bat roosts present within the trees. Confirmation is required that either there is no suitability for bat roosting within these trees or suitable protection measures will be put in place. Some of the buildings on site appear to have barge boards or other similar features that may provide roosting potential for crevice dwelling bats. The lack of suitability for bats roosting within the buildings should be confirmed with appropriate evidence. Buddleia should be included in the invasive species section of table 6-1. Section 5.4.13 states that bird boxes are to be implemented on a 2:1 ratio. Clarification is required regarding what this relates to. Further, nest box numbers should be based on the opportunity for enhancement as there is expected to be limited loss of tree nesting habitat. The details of a nest box plan can be secured via a planning condition. Reference to appropriate habitat creation for reptiles or birds should be included in Table 6-1.	

Report	Comments	Policy
	Clarification should be provided regarding the abundances in Table A.1 – Botanical Species List; what do the hyphens indicate in the 'grassland area' section. Further, the Non-native column should be reviewed. For example, meadow buttercup is included as a non-native species. Kingfisher was recorded in the breeding bird surveys, but this species is not mentioned in the assessment of the value of the bird assemblage on site or shown on the maps in Figure 3-4. Confirmation is required where this species was recorded and where it was considered within the zone of influence.	
Ecology chapter	ES Section 11.10 should also refer to common lizard. Wimbledon Common SAC and Richmond Park SAC are both considered within sections 11.82 to 11.85. It is stated that there are no construction phase impact pathways between the development site and these two SACs. There is direct hydrological connectivity through Beverley Brook between the site and these two SACs. This represents a potential impact pathway in light of the presence of 4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> (Annex I habitat present as a qualifying feature) within Wimbledon Common SAC. The potential construction and operational phase effects must be assessed through the shadow Habitats Regulations Assessment (HRA) screening process. Sections 11.95 and 11.231 state there is a lack of hydrological connectivity between the site and Sir Joseph Hood memorial Wood LNR. As this LNR is only separated from the	• National Planning Policy Framework 2024 (NPPF) • Natural Environment and Rural Communities (NERC) Act 2006 • Conservation of Habitats and Species Regulations 2017 as amended (Habitats Regulations) • Wildlife and Countryside Act 1981 • Adopted Local Plan Policy O15.1 and O15.3

Report	Comments	Policy
	site by the Beverley Brook, clarification is required regarding the lack of hydrological connectivity. Under the Future Baseline scenario, it is likely that the Japanese knotweed and Buddleia will spread further within the site. It is acknowledged that this is may not represent a significant change. Sections 11.107 and 11.198 refers to a lack of Schedule 1 species using the application site and adjacent LNR. The breeding bird survey notes the presence of a kingfisher during the breeding bird surveys (although a location is not provided). In light of the proposed loss of grassland habitat and lighting of the site, minor beneficial impacts on bat foraging and commuting and reptiles is likely to be an overestimate. It is acknowledged that the impacts are likely to be not significant. The suitability of proposed mitigation cannot be properly assessed without a clear post-development habitat plan. It is assumed that the air quality assessment is suitably robust.	
BNG	No post development habitat plan is provided (black and white landscaping plan does not provide the required detail). Suitable plan(s) showing the proposed habitat types and their conditions should provided.	• Environment Act 2021 • Policy O15.3

Report	Comments	Policy
	Section 2.1.3 states that "The best fit for the majority of the vegetated areas is neutral grassland, although it is recognised that the sward composition and structure may not fully align with typical examples of this habitat type. This classification has been adopted as a precautionary measure.". However, Table 2-1 (labelled incorrectly) states that the grassland is a good representation of the habitat type. EclA has construction period of 5-10 years, however this is not reflected in the Biodiversity Metric calculations. Section 3.1.10 states that the scrub will feature glades of meadow, but the associated condition criteria in Table 3.3 fails. Table 3.5 states that planted trees (or 50% of the block) will reach maturity within 27 years. Species lists are not included to assess the appropriateness of this assessment. Section 3.1.2 refers to trees within hardstanding areas, but Table 3.5 states that all trees will have greater than 20% canopy oversailing vegetation underneath. The rationale for the classification of some of the planted trees as 'urban' and others as 'rural' should be presented. No rationale for the strategic significance assessment has been presented. This should be included.	

Report	Comments	Policy
	The baseline watercourse unit total in section 4.1.4 does not align with that in the biodiversity metric spreadsheet. The classification of the green roofs as open mosaic habitat is not appropriate. The definition requires the habitat to be $\geq 0.25\text{ha}$, which is in excess of the total area proposed and hence all of the individual green roofs will also fall below this threshold. The trading rules for the development are not met. Even without the point above regarding open mosaic habitat, the provision of this habitat type is insufficient to replace the lost grassland and scrub units. Table B.1: The hedgerow fails A2 ($<1.5\text{m}$ width), but passes D2 (current damage, including excessive hedgerow cutting). Maintaining the hedges at a width of $<1.5\text{m}$ would involve a regular cutting regime. Section 11.6.1 of the ES chapter states that "The majority of the trees on site appeared to be recently felled". Details should be provided regarding how recent habitat degradation has been accounted for.	
Biodiversity Checklist	No comments	N/A

5.3.7 Third Party Ecologist (19/01/2026) (In response to query as to whether a Habitats Regulations Assessment is needed):

Regarding the HRA question, we expect some form of HRA screening assessment will likely be required to demonstrate the proper HRA process has been followed, especially in light of the comment made that you provided below. Stag beetle are the Annex II species that are the primary reason for designation of these sites. Wimbledon Common also supports wet and dry heath habitats that are Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site. As such, I doubt that an appropriate assessment will be required. It is unlikely that there will be impact pathways associated with these receptors, however our question to the applicant aims to understand their assessment and how they undertook it.

5.3.8 Third Party Ecologist (following submission of additional information) (27/02/2026)

The table below provides a response to the following documents and responses from the applicant in relation to the Motspur Park Gas Holder site (Royal Borough of Kingston ref. 25/02562/FUL and London Borough of Merton ref 25/P2859):

- Ecology response note to MKA Ecology (LB Merton)(40713855.1)

- Ecology response note to RB Kingston(40713856.1)
- RBK_LBM Letter - Ecology updates 03.02.2026(40714706.1)
- Updated ES Volume 1 Chapter 11 Ecology (V2)(40714589.1)
- Updated ES Volume 3 Technical Appendix 11.1 – Ecological Impact Assessment(40714658.1)
- Updated ES Volume 3 Technical Appendix 11.2 – Biodiversity Net Gain Assessment(40713853.1)
- Appendix 11.2a - Motspur Park - BNG Metric_v3
- Motspur Park HRA Screening issued 05.02.26(40722971.1)

Following the updates to the documents listed above and the responses provided I have 'no objection subject to conditions'. Areas where appropriate conditions are recommended are provided in the table below.

No.	MKA Ecology Ltd Comments 16/01/2026	RPS Response 04/02/2026 and 05/02/2026	MKA Ecology Ltd Comments 27/02/2026
Ecological Impact Assessment (EclA)			
1	The timings of the dawn and dusk bird survey should be provided.	Timings of the breeding bird surveys have been added to section 2.6.5 of the EclA: • Visit 1: 25th April 2025; Dawn (06:36 to 08:36) Dry, 6 degrees C, cloud cover 10%, wind E - 1 • Visit 2: 13th May 2025; Dawn (06:28 to 08:28) Dry, 15 degrees C, cloud cover 60%, wind NE - 1 • Visit 3: 18th June 2025; Dawn (05:27 to 07:27) Dry, 15 degrees C, cloud cover 10%, wind SE - 1 • Visit 4: 25th June 2025; Dawn (05:32 to 07:32) Dry, 17 degrees C, cloud cover 100%, wind SW - 2 • Visit 5: 10th July 2025; Dawn (04:56 to 06:56) Dry, 17 degrees C, cloud cover 60%, wind S - 2 • Visit 6: 15th July 2025; Dusk (20:03 to	No further comments.

No.	MKA Ecology Ltd Comments 16/01/2026	RPS Response 04/02/2026 and 05/02/2026	MKA Ecology Ltd Comments 27/02/2026
		22:03) Dry, 20 degrees C, cloud cover 40%, wind SE – 2	
2	The breeding bird survey results shown in Figure 3-4 extend well beyond the site boundary, including mallard and moorhen territories within gardens, which is unlikely. These drawings also include wren and wood pigeon, which are stated to be excluded (4.3.20). Clarification regarding the extent of the breeding bird survey should be provided.	Clarification regarding the extent of the breeding bird survey area has been added to section 2.6.3: <i>The survey area plus a 500 m buffer was walked at a slow pace in order to locate and identify all individual birds. Figure 3-4 includes woodpigeon and wren to provide a holistic picture of birds present on site, they are not discussed further in the evaluation and potential impacts section. Woodpigeon and wren are both included on the BoCC Amber List because Britain supports at least 20% of the European populations of these species. However, it is widely recognised that both of these species are highly abundant within the local county and at a national level. Therefore, they are typically excluded from any discussions concerning species of conservation concern.</i>	While it is noted that it is unexpected for mallard and moorhen breeding territories to be present within small residential gardens (offsite), this does materially not impact the conclusions drawn and as such I have no further comments.
3	Due to the presence of breeding peregrine in the years preceding 2025, peregrine mitigation would be appropriate. This could include an assessment of the area surrounding the site, if there is no suitable on-site potential.	Provision was already made for nesting peregrine in Volume 1: Main Environmental Statement Chapter 18: Summary of Mitigation and Residual Effects. The following has been added to section 5.4.14 of the EclA for clarification: Records from local groups indicate that peregrine falcon, a Schedule 1 list species, have been present on existing gas holders for at least the previous three years, with records for this species returned within 2 km of the local area during the	No further comments.

No.	MKA Ecology Ltd Comments 16/01/2026	RPS Response 04/02/2026 and 05/02/2026	MKA Ecology Ltd Comments 27/02/2026
		data search. Therefore, despite being absent from the site in 2025, an artificial peregrine falcon nest box will be installed to one residential block roof at least 20 m in height to the north of the site.	
4	Wimbledon Common SAC and Richmond Park SAC are considered within the ecology ES chapter, but not within the EclA. Clarification regarding the approach to assessing potential impacts to these sites should be provided.	Wimbledon Common SAC and Richmond Park SAC are 3.61km distant or more from the Motspur site. This is beyond the best practice norm of a 2km buffer when considering sites with less mobile species listed as Features of Interest. Both sites have Stag Beetles notified as Features of Interest, however this species is recognised as weak flying and therefore the SAC's were screened out at that stage based on the distances and the buffer zone. There is precedence for this decision in the HRA for the 2024 Richard Upon Thames Council Local Plan (https://www.richmond.gov.uk/media/d50pkhrm/sd_004a_hra_of_the_reg_19_richmond_upon_thames_local_plan_accessible.pdf): <i>Section 4.13: This species is mobile and as such has the potential to disperse outside of the Special Area of Conservation boundary. Research indicates that male stag beetles typically fly up to 2km during the breeding over the summer months to travel to females whilst the female stag beetles rarely fly [See reference 22]. As such and in line with</i>	Receipt of HRA screening is acknowledged, any further HRA comments are presented within the HRA response below.

No.	MKA Ecology Ltd Comments 16/01/2026	RPS Response 04/02/2026 and 05/02/2026	MKA Ecology Ltd Comments 27/02/2026
		a precautionary approach a 2km buffer has been applied in this assessment. <i>4.19: No Likely Significant Effects are predicted in relation to Richmond Park Special Area of Conservation or Wimbledon Common Special Area of Conservation as a result of impacts on functionally linked habitats for stag beetles, from proposed development in the plan, either alone or in-combination with other plan and policies.</i> <i>Therefore, this can be screened out from further assessment.</i> Similar justification was also provided in the HRA for the 2021 Merton Borough Local Plan (https://www.merton.gov.uk/system/files?file=merton20local20plan20habitats20regulations20assessment20stage20320reg1920july21.pdf) <i>Section 4.3: Potential effects on functionally connected land will only be relevant in relation to Lee Valley SPA / Ramsar as this site has bird species as its qualifying features. The stag beetle is a qualifying feature of Epping Forest SAC and may travel outside of the SAC boundaries; however, they will not travel far.</i> Research suggests that 2km may be an appropriate buffer	

No.	MKA Ecology Ltd Comments 16/01/2026	RPS Response 04/02/2026 and 05/02/2026	MKA Ecology Ltd Comments 27/02/2026
		inside which sites could be functionally connected, as this is the distance that males the breeding season. Epping Forest SAC is more than 2km outside the borough boundary and the 15km HRA catchment area. The WSP HRA Screening Report undertaken for Royal Borough of Kingston Local Plan in 2022 (https://www.kingstonletstalk.co.uk/planning/first-draft-localplan/supporting_documents/RBKUP_Local_Plan_Reg_18_HRSA.pdf) did utilise a 10km ZOI to screen in sites (including Wimbledon Common SAC). However, this buffer was used as it represents the average trip length (as noted in the National Transport Survey) and as included in the JNCC guidance for air quality, as opposed to any ecological basis. Wimbledon Common SAC was then screened in under this buffer for potential adverse impacts due to air pollution and public access/disturbance, as opposed to any adverse hydrological or ecological effects. On the basis of the above, 2km is considered appropriate for the EclA and all impacts to protected sites and species are properly assessed.	
5	There is a risk of slow worm (and common lizard) mortality during the construction process. From the information presented,	Reptile translocation and temporary fencing during construction is included in the ES Ecology Chapter. Detail has been added to section 5.4.9 of the EclA for clarification: It is recommended	The approach described in Section 5.4.8 to 5.4.12 of EclA is not sufficient for a translocation of a

No.	MKA Ecology Ltd Comments 16/01/2026	RPS Response 04/02/2026 and 05/02/2026	MKA Ecology Ltd Comments 27/02/2026
	there is no evidence that slow worms will be able to disperse to safe areas from habitat manipulation alone (e.g. from the centre of the site to retained areas in the south) and translocation is likely to be needed. Justification is required for the lack of reptile translocation proposed. It is not possible to fully assess the suitability of the proposed approach without a more detailed post- development landscape plan.	that a pre-commencement hand search is first undertaken, followed by the temporary transfer of any reptiles to the woodland edge. Temporary reptile fencing will be installed to prevent reptiles re- entering the construction site.	good population of slow worms. The proposals are a Precautionary Working Method Statement and destructive search prior to two-stage clearance, with reptiles encountered moved to the other side of exclusion fencing, not a comprehensive and systematic exclusion to remove reptiles from areas where construction will cause potential for an offence to occur. Proposals should be revised to include a full translocation methodology. Further, the proposed height of the first stage cut is to knee height (5.4.10, EclA). This height of cut is not in line with the 150mm height typically used to encourage reptile dispersal. The approach of carrying out a Reptile Carrying Capacity Audit and developing a Reptile Mitigation Plan prior to the commencement of works should be secured by a suitably

No.	MKA Ecology Ltd Comments 16/01/2026	RPS Response 04/02/2026 and 05/02/2026	MKA Ecology Ltd Comments 27/02/2026
			worded condition(s). The comments on the approach listed above can be addressed as part of the discharge of said condition(s). As such, I have no further comments at this time.
6	The Ligman downlights are over the 2700K recommended by best practice guideline. The lux levels are stated as being of "1 lux or below, along important commuting features." This is higher than recommended under best practice guidelines (0.2 lux on the horizontal plane and at or below 0.4 lux on the vertical plane). Further, the lighting proposed along the two access roads and the network rail boundary in the west will increase lighting levels along previously dark corridors. The presence of myotis and brown long-eared bats highlights the importance of retaining these dark corridors. The lighting strategy should be reviewed to minimise lighting in key areas.	The lighting along the long access tracks to the north and south has been modified to reduce lux levels for bats but lighting is required for safety reasons. The lighting strategy is designed to minimise light spill into other habitat areas, especially the adjacent woodland. See the Landscape Design Statement - Chapter 3 Design Strategies, Chapter 3.10 Lighting Strategy for more information.	In Chapter 3.10 of the Landscape Design Strategy it is stated that the details of lighting design to be reviewed by an ecologist can be addressed by way of a planning condition. A sensitive lighting strategy should be secured via an appropriate condition. The sensitive lighting strategy should set out how best practice has been followed to minimize the impact on sensitive receptors, with appropriate ecological input. As such, I have no further comments at this time.

No.	MKA Ecology Ltd Comments 16/01/2026	RPS Response 04/02/2026 and 05/02/2026	MKA Ecology Ltd Comments 27/02/2026
7	Bat boxes are only proposed on trees, these should also be integrated onto the buildings.	Bat boxes are integrated onto buildings as stated in the Landscape Design Statement - Chapter 3 Design Strategies, 3.1. Ecology Strategy. This has been added section 5.4.24 of the EcIA for clarification: <i>To enhance the wider site with respect to roosting bats, bat boxes should be installed on any of the mature retained trees and appropriate new buildings around the site boundaries.</i>	The provision of bat boxes should be secured by an appropriately worded condition. As such, I have no further comments at this time.
8	There appears to be potential for impacts to trees along the northern and southern access roads from lighting and pruning to facilitate access. These factors could impact any bat roosts present within the trees. Confirmation is required that either there is no suitability for bat roosting within these trees or suitable protection measures will be put in place.	During the Preliminary Ecological Appraisal survey visit it was confirmed that there were no potential roosting features (PRFs) on any of the trees present onsite (see RPS PEA February 2023, section 3.4.11). Most of the larger trees had been recently pruned as part of essential maintenance to the gasworks and none of the remaining trees were of a suitable size or had features to support roosting bats.	No further comments.
9	Some of the buildings on site appear to have barge boards or other similar features that may provide roosting potential for crevice dwelling bats. The lack of suitability for bats roosting within the buildings should be confirmed with appropriate evidence.	During the Preliminary Ecological Appraisal survey visit it was confirmed that there were no potential roosting features (PRFs) on any of the buildings onsite (see RPS PEA February 2023, section 3.4.11). All buildings are single storey open space rooms with no loft voids and no gaps were recorded behind the bargeboards.	No further comments.

No.	MKA Ecology Ltd Comments 16/01/2026	RPS Response 04/02/2026 and 05/02/2026	MKA Ecology Ltd Comments 27/02/2026
10	Buddleia should be included in the invasive species section of table 6-1.	Buddleia has been added to section 6-1 of the EcIA.	No further comments.
11	Section 5.4.13 states that bird boxes are to be implemented on a 2:1 ratio. Clarification is required regarding what this relates to. Further, nest box numbers should be based on the opportunity for enhancement as there is expected to be limited loss of tree nesting habitat. The details of a nest box plan can be secured via planning condition.	The reference to the 2:1 ratio has been removed from section 5.4.14 of the EcIA as this concerns the removal of existing bird boxes and is therefore not relevant for this development as no existing bird boxes are present on site. Numbers and locations will be agreed as a planning condition.	No further comments, however, reference to this 2:1 ratio should also be removed from Table 6-1 of the EcIA.
12	Reference to appropriate habitat creation for reptiles or birds should be included in Table 6-1.	Appropriate habitat creation for birds and reptiles was included in the ES Ecology Chapter. Reference to appropriate habitat creation for reptiles and birds have been added to Table 6-1 of the EcIA: <i>Provision of hibernacula for reptiles will be created by reusing material onsite...Provision of new habitats for feeding and nesting are included in the landscaping.</i> Detail has also been added to section 5.4.12: <i>A reptile mitigation plan will be required to ensure no reptiles are harmed during the construction and that the site continues to provide good quality habitat for reptiles, post development, including the provision of hibernacula by reusing materials onsite.</i>	No further comments.

No.	MKA Ecology Ltd Comments 16/01/2026	RPS Response 04/02/2026 and 05/02/2026	MKA Ecology Ltd Comments 27/02/2026
13	Clarification should be provided regarding the abundances in Table A.1 – Botanical Species List; what do the hyphens indicate in the 'grassland area' section. Further, the Non-native column should be reviewed. For example, meadow buttercup is included as a non-native species.	The hyphens in the DAFOR column of Table A.1 of the EcIA indicate that no DAFOR was recorded for these species. A note has been added to the bottom of Table A.1 to clarify this. Meadow buttercup has been amended to a native species in Table A.1.	Meadow buttercup has been updated to a native species in Table A.1. However, creeping cinquefoil, broadleaved dock and curled dock remain incorrectly listed as a non-native species. While this should be corrected, it does not materially impact the conclusions drawn and as such, I have no further comments.
14	Kingfisher was recorded in the breeding bird surveys, but this species is not mentioned in the assessment of the value of the bird assemblage on site or shown on the maps in Figure 3-4. Confirmation is required where this species was recorded and where it was considered within the zone of influence.	A single kingfisher was observed flying along Beverly Brook within the 500 m buffer, not onsite and not displaying any breeding behaviour, therefore it is absent from the breeding bird assemblage onsite. It was noted down during the survey as wider context.	No further comments.
Ecology ES Chapter			
15	Section 11.10 should also refer to common lizard.	Section 11.10 of the ES chapter now refers to common lizard.	No further comments.
16	Wimbledon Common SAC and Richmond Park SAC are both considered within sections 11.82 to 11.85. It is stated that	The response is correct in that Beverly Brook flows through both SACs, however the SACs drain into Beverly Brook rather than the brook feeding into the wetland areas. Heath areas are	Receipt of HRA screening is acknowledged, any further HRA

No.	MKA Ecology Ltd Comments 16/01/2026	RPS Response 04/02/2026 and 05/02/2026	MKA Ecology Ltd Comments 27/02/2026
	there are no construction phase impact pathways between the development site and these two SACs. There is direct hydrological connectivity through Beverley Brook between the site and these two SACs. This represents a potential impact pathway in light of the presence of 4010 Northern Atlantic wet heaths with Erica tetralix (Annex I habitat present as a qualifying feature) within Wimbledon Common SAC. The potential construction and operational phase effects must be assessed through the shadow Habitats Regulations Assessment (HRA) screening process.	dry and are usually not significantly linked to nearby surface watercourses, whilst wet heath habitats require acid water quality and are fed usually by local pooling of rainfall rather than watercourses, so forming pools and bogs. As such, whilst Beverly Brook flows through the SACs there are no direct links to the habitat Features of Interest and therefore the heath habitats within the SACs are not hydrologically linked to water quality issues in the brook. The Outline Demolition and Construction Environmental Management Plan (section 11.78) sets out the best practice pre-construction and construction phase actions to safeguard the site and environment. These measures and the distance downstream of these two SACs (4km+) and together these allow the SACs to be screened out. This screening out of SACs for potential hydrological impacts is normal practice for both Merton and Richmond Borough for the type and scale of construction within this application. For example, both SACs were screened out of hydrological impacts in the Metis HRA Screening of the RBK Local Plan in 2023 under similar justification provided here (https://www.kingston.gov.uk/sites/default/files/downloads/)	comments are presented within the HRA response below.

No.	MKA Ecology Ltd Comments 16/01/2026	RPS Response 04/02/2026 and 05/02/2026	MKA Ecology Ltd Comments 27/02/2026
		Appendix_4 HRA_Screening_Report_Kingston_v1.2_final_with_format_corrections.pdf). Furthermore, Wimbledon Common SAC, although screened in for potential adverse impacts due to air pollution and public access/disturbance, was screened out of any adverse hydrological effects during the WSP HRA Screening of the RBK Local Plan in 2022 (https://www.kingstonletstalk.co.uk/planning/first-draft-local-plan/supporting_documents/RBKUP_Local_Plan_Reg_18_HRSA.pdf). There is no precedence for other similar applications to have hydrological connectivity to terrestrial habitats screened in. It is therefore considered that a shadow Habitats Regulations Assessment (HRA) screening process is not required.	
17	Sections 11.95 and 11.231 state there is a lack of hydrological connectivity between the site and Sir Joseph Hood memorial Wood LNR. As this LNR is only separated from the site by the Beverley Brook, clarification is required regarding the lack of hydrological connectivity.	Sir Joseph Hood memorial Wood LNR is considered to have a lack of hydrological connectivity and was screened out of assessment for the same reasons as above for Wimbledon Common SAC and Richmond Park SAC.	No further comments.

No.	MKA Ecology Ltd Comments 16/01/2026	RPS Response 04/02/2026 and 05/02/2026	MKA Ecology Ltd Comments 27/02/2026
18	Under the Future Baseline scenario, it is likely that the Japanese knotweed and Buddleia will spread further within the site. It is acknowledged that this is may not represent a significant change.	Reference to these species added to the Future Baseline scenario (section 11.74 of the ES Chapter): <i>Given the likely changes in habitat composition in the long term, there may be changes in the distribution and population density of protected and notable species across the proposed development site, including invasive Japanese Knotweed and Buddleia.</i>	No further comments.
19	Sections 11.107 and 11.198 refers to a lack of Schedule 1 species using the application site and adjacent LNR. The breeding bird survey notes the presence of a kingfisher during the breeding bird surveys (although a location is not provided).	The only Schedule 1 species observed was a single kingfisher which showed no breeding behaviour during the breeding bird surveys. This explanation has been added to the relevant sections accordingly. Section 11.107 of the ES Chapter: <i>Observations as part of the breeding bird surveys of the application site have shown that there was just one Schedule 1 species using the application site: a single kingfisher was observed along Beverly Brook to the east of the site, within the 500 m buffer, but exhibited no evidence of breeding behaviour. The remaining birds observed were common species reflective of the local area are present, which are likely habituated to some levels of disturbance, given the relatively urban setting.</i> Section 11.198: <i>The grassland and woodland on site offer suitable habitat to support common species of breeding birds, and the most recent bird surveys (RPS, 2025) demonstrate this,</i>	No further comments.

No.	MKA Ecology Ltd Comments 16/01/2026	RPS Response 04/02/2026 and 05/02/2026	MKA Ecology Ltd Comments 27/02/2026
		<i>along with a lack of any Schedule 1 species, with the exception of one kingfisher assessed as non-breeding within the 500 m survey buffer.</i>	
20	In light of the proposed loss of grassland habitat and lighting of the site, minor beneficial impacts on bat foraging and commuting and reptiles is likely to be an overestimate. It is acknowledged that the impacts are likely to be not significant.	The proposed lighting scheme along the long access tracks to the north and south has been designed to reduce lux levels for bats and is designed to minimise light spill into other habitat areas, especially adjacent woodland (see the Landscape Design Statement - Chapter 3 Design Strategies, Chapter 3.10 Lighting Strategy). Along with the significant enhancements proposed in Section 11.211 of the ES chapter (new areas of semi-improved grassland, enhancements to the brook corridor, and new areas of mixed scrub and individual tree planting), minor beneficial impacts on bat foraging and commuting and reptiles is considered appropriate.	No further comments.
21	The suitability of proposed mitigation cannot be properly assessed without a clear post- development habitat plan.	Post-development habitat plans are provided in the Landscape Design Statement - Chapter 3 Design Strategies, Chapter 3.3 Planting Strategy.	No further comments.
22	It is assumed that the air quality assessment is suitably robust.	Yes the Air Quality Assessment has been undertaken following industry practice and by experts	No further comments.
Biodiversity Net Gain (BNG)			
23	No post development habitat plan is provided (black and white landscaping plan does not provide the required detail).	Post-development habitat plans are provided in the Landscape Design Statement - Chapter 3 Design Strategies, Chapter 3.3 Planting Strategy and in drawings D3423-FAB-XX-DR-L-1001	A post development habitat plan should be submitted as part of the Biodiversity Gain Plan showing the

No.	MKA Ecology Ltd Comments 16/01/2026	RPS Response 04/02/2026 and 05/02/2026	MKA Ecology Ltd Comments 27/02/2026
	Suitable plan(s) showing the proposed habitat types and their conditions should be provided.	to D3423-FAB-XX-DR-L-1007. Further details will be required by way of a landscape condition in the usual way.	habitat types as per the biodiversity metric habitat types. The Biodiversity Gain Plan is only required to be submitted to discharge the biodiversity gain condition. As such, I have no further comments at this time.
24	Section 2.1.3 states that "The best fit for the majority of the vegetated areas is neutral grassland, although it is recognised that the sward composition and structure may not fully align with typical examples of this habitat type. This classification has been adopted as a precautionary measure.". However, Table 2-1 (labelled incorrectly) states that the grassland is a good representation of the habitat type.	Table 2.1 of BNG label amended from "Individual tree condition assessment" to "Other neutral grassland condition assessment". It is recognised that the sward composition and structure of the grassland onsite may not fully align with typical examples of other neutral grassland, however it still offers a good representation based on the UKHab description, with indicator species listed by UKHab for this specific grassland type consistently present. Therefore, the condition of the grassland onsite remains of moderate condition by passing 3 of the UKHab criteria.	No further comments.
25	EclA has construction period of 5-10 years, however this is not reflected in the Biodiversity Metric calculations.	To respond to the phasing of the scheme, a delay in the habitat creation of each biodiverse roof has been applied in the BNG metric. With a 1-year delay associated with Phase 2 (Block A), and a subsequent delay of two years between the remaining phases. This approach is considered to be sufficiently precautionary.	Early habitat creation is supported, however, details should be provided within the HMMP supporting the timeframes set out here, including details of how habitats created during the construction period will be

No.	MKA Ecology Ltd Comments 16/01/2026	RPS Response 04/02/2026 and 05/02/2026	MKA Ecology Ltd Comments 27/02/2026
		Similarly, for the new tree planting, an average delay of 6 years has been applied to the urban tree planting habitats (aside from that associated with the woodland enhancements and those along the riparian zone, as these will be delivered within Phase 1). The 6-year delay is considered to be appropriately cautious, as circa 50% of the trees will likely be planted prior to this, and the remainder during years 7-10. All other habitats associated with the scheme will be delivered within Phase 1.	safeguarded. The production of the HMMP should be secured by an appropriately worded condition. As such, I have no further comments at this time.
26	Section 3.1.10 states that the scrub will feature glades of meadow, but the associated condition criteria in Table 3.3 fails.	Table 3.3 of the BNG amended to reflect this, with the scrub now passing four out of five of the UKHab Criteria but remaining of 'moderate' condition category.	The HMMP should include suitable details regarding the creation and maintenance of clearings, glades and rides. The production of the HMMP should be secured by an appropriately worded condition. As such, I have no further comments at this time.
27	Table 3.5 states that planted trees (or 50% of the block) will reach maturity within 27 years. Species lists are not included to assess the appropriateness of this assessment.	A tree species planting list can be found in the Landscape Design Statement - Chapter 3 Design Strategies, Chapter 3.2 Tree Planting Strategy. These species have been added to Section 3.1.2 of the BNG.	No further comments.

No.	MKA Ecology Ltd Comments 16/01/2026	RPS Response 04/02/2026 and 05/02/2026	MKA Ecology Ltd Comments 27/02/2026
28	Section 3.1.2 refers to trees within hardstanding areas, but Table 3.5 states that all trees will have greater than 20% canopy oversailing vegetation underneath.	Table 3.5 of the BNG has been amended to reflect that not all trees will have greater than 20% canopy oversailing vegetation underneath. This has not changed the habitat conditions classifications.	No further comments.
29	The rationale for the classification of some of the planted trees as 'urban' and others as 'rural' should be presented.	All planted trees are referred to as urban in the report, the rural trees in the metric have been adjusted to urban. This does not impact the BNG results.	No further comments.
30	No rationale for the strategic significance assessment has been presented. This should be included.	The justification for the strategic significance has been included in Section 1.2.12 of the BNG. It confirms that woodland has been outlined in The London Plan 2021: Policy G7 Trees and Woodlands.	No further comments.
31	The baseline watercourse unit total in section 4.1.4 does not align with that in the biodiversity metric spreadsheet.	Amended to 5.22 units within the BNG report to align with the metric.	No further comments.
32	The classification of the green roofs as open mosaic habitat is not appropriate. The definition requires the habitat to be ≥ 0.25 ha, which is in excess of the total area proposed and hence all of the individual green roofs will also fall below this threshold.	We acknowledge the discrepancy between the technical definition of OMH (>0.25 ha) and the green roof area to be delivered, and have changed the BNG metric to biodiverse green roof instead. The roof will still provide a mosaic of habitats but is no longer called OMH, instead the development will provide an OMH-styled green/brown roof design.	No further comments.

No.	MKA Ecology Ltd Comments 16/01/2026	RPS Response 04/02/2026 and 05/02/2026	MKA Ecology Ltd Comments 27/02/2026
33	The trading rules for the development are not met. Even without the point above regarding open mosaic habitat, the provision of this habitat type is insufficient to replace the lost grassland and scrub units.	The BNG report has been amended in Section 4.1.11: <i>While the scheme delivers an overall net gain in biodiversity units, it is important to note that the BNG trading rules require that losses of a particular habitat type, such as neutral grassland, are ideally replaced on a like-for-like or better basis. As trading rules have not been satisfied, the development will seek to deliver this off-site, through provision of neutral grassland and scrub habitat, either within land under the same ownership, via a joint venture with the Royal Borough of Merton or through purchasing habitat units from a third-party scheme. Plans are not known at this stage and will be determined in due course.</i>	Details of off-site units can be confirmed in the Biodiversity Gain Plan. The Biodiversity Gain Plan is only required to be submitted to discharge the biodiversity gain condition. As such, I have no further comments at this time.
34	Table B.1: The hedgerow fails A2 (<1.5m width), but passes D2 (current damage, including excessive hedgerow cutting). Maintaining the hedges at a width of <1.5m would involve a regular cutting regime.	A2 criterion within the hedgerow condition sheet is >1.5m width, and managing a hedge to 1.5m is not considered damaging, as the criteria references "excessive" cutting, not regular management.	No further comments.
35	Section 11.6.1 of the ES chapter states that "The majority of the trees on site appeared to be recently felled". Details should be provided regarding how recent habitat degradation has been accounted for.	This should say "pruned" to align with the EclA and BNG, and has been amended. See Section 11.6.1 of the ES chapter.	No further comments, however, this should also be updated in section 6.109 of the ES.

No.	MKA Ecology Ltd Comments 16/01/2026	RPS Response 04/02/2026 and 05/02/2026	MKA Ecology Ltd Comments 27/02/2026
Habitat Regulations Assessment screening report			
36	N/A	N/A	No comments.

5.3.9 **RBK Ecologist (04/02/2026):**

Consultee comments (25/02/2026/FUL)

Biodiversity Officer

The site is positioned critically between two major ecological features: the Beverley Brook Site of Importance for Nature Conservation (SINC) (partially within and adjacent to the eastern boundary) and the Railway Green Corridor/Manor Park SINC (adjacent to the western boundary). The proposed high-density residential development (586 homes in buildings up to 16 storeys) within this constrained 2.97Ha footprint creates a substantial risk of ecological squeeze due to both construction impacts and long-term operational pressure. The Ecology Impact Assessment (EclA) correctly identifies that the periphery areas (the watercourse and railway track) are crucial green corridors for commuting and foraging bats. Any significant impact here threatens regional ecological connectivity.

We acknowledge the comprehensive nature of the submitted Environmental Statement and the high level of Biodiversity Net Gain (BNG) commitment. However, to ensure the long-term protection and

resilience of the two adjacent SINC's and their dependent species, we request that the following points be addressed and secured via planning condition:

SINC Buffer Enhancement and Protection

An updated landscape plan showing the specific location and dense composition of buffer planting (e.g., dense scrub/defensive planting) along the Beverley Brook and railway SINC boundaries is required to physically deter footfall and domestic pet access from the new residential properties. The plan must clearly define the Construction Exclusion Zone (CEZ) and the Ecological Protection Zone (EPZ) for the retained SINC woodland.

Lighting Management Plan (Operational)

The sensitive lighting strategy must be reinforced by a Residential Lighting Charter secured via planning condition or Section 106 agreement. This charter should specify measures to mitigate uncontrolled light trespass from private residences, including mandatory use of full cut-off external light fixtures and advice on internal light management (e.g., mandatory blinds or deep window reveals) to protect the commuting corridors from light intrusion.

Correction needed in Chapter 11: Ecology (Reptile Assessment)

The assessment of the slow worm population within the Environmental Statement (ES), Volume 1, Chapter 11 and the supporting Technical Appendix 11.1 (EcIA) contains a methodological error that significantly underestimates the conservation importance of the local slow worm population. The EcIA concludes a "low population" with a calculated peak count of 2.5 adult slow worms, based on applying a density ratio to the observed maximum count. However, direct application of the referenced Froglife (1999) methodology, which classifies populations based on the maximum number of adults seen on a single visit, shows that the recorded peak count of 7 adult slow worms actually falls within the 5–20 adult range, classifying it as a Good Population. Furthermore, the consistently high number of juvenile slow worms recorded (53 total recorded) clearly indicates a successfully breeding and self-sustaining population.

Consequently, the proposed mitigation strategy (Volume 1: Main Environmental Statement Chapter 18: Summary of Mitigation and Residual Effects), which relies on a simple Precautionary Method of Working (PMoW) consisting of a two-stage strimming operation for voluntary displacement, is highly likely to be inadequate for a Good Population. For populations of this size and confirmed breeding status, relying on voluntary movement presents an unacceptable and elevated risk of reckless injury or killing during the construction clearance phase, breaching the requirements of the Wildlife & Countryside Act 1981. The successful conservation of a Good Population requires a more rigorous approach, typically involving the installation of temporary reptile exclusion fencing (E-Fencing) around the entire development footprint,

followed by a systematic, intensive active trapping and removal program (translocation).

Therefore, we request that the EcIA formally acknowledges the population status as a Good Population, and that the mitigation strategy is immediately upgraded. The revised strategy must commit to active translocation measures, secured under a detailed Reptile Mitigation Plan that clearly quantifies the ecological carrying capacity of the enhanced on-site receptor areas (e.g., the woodland edge, new grassland, and hibernacula), ensuring sufficient habitat is available to support the entire Good Population long-term without risk of overcrowding or subsequent dispersal into unsafe areas. Without this demonstrably robust mitigation, the predicted long-term residual effect of "Minor Beneficial" for reptiles is considered unsubstantiated, and the actual residual impact could be adverse and significant in EIA terms.

Arboricultural Removals and Bat Roost Assessment

The Arboricultural Impact Assessment identifies 5 individual trees required for removal, plus 6 Category U trees recommended for removal on arboricultural grounds. This confirms that a minimum of 11 individual trees, 3 groups of trees, and partial removal of 2 groups are proposed. While the EIA states "5.4.17 10 trees are to be removed in order to facilitate the development (refer also to the RPS AIA); all of these were assessed for their suitability to support roosting bats, albeit none were found to have any features, and so, no further survey work / mitigation is required."

We request that a statement be included in the Arboricultural Method Statement (AMS) confirming that the original assessment of the trees for bat roost suitability (which found negligible potential) has been formally reviewed against the Bat Conservation Trust's 'Bat Surveys for Professional Ecologists: Good Practice Guidelines' (4th Edition, 2023) (Chapter 6: Surveying Trees and Woodland for Bat Roosts).

Although the initial assessment found "no features," best practice and due diligence require confirmation that the assessment methodology used was robust and adheres to the latest guidelines. Furthermore, the AIA implicitly suggests potential roost features (PRFs) are present on retained trees by mentioning "ivy on main stem" on some trees (e.g., T16, #T32, #T44), which are known PRFs, making the need for confirmation on the removed trees essential.

5.3.10 **Natural England (01/12/2025)**

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Natural England's generic advice on other natural environment issues is set out at Annex A.

Local sites

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 187, 188 and 192 of the NPPF and any relevant development plan policy.

There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species

Priority habitats and Species are of particular importance for nature conservation and are included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. A list of priority habitats and species can be found on Gov.uk.

Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

Sites of Special Scientific Interest Impact Risk Zones

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A. We would be happy to comment further should the need arise but if in the meantime

you have any queries please do not hesitate to contact us. For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

5.3.11 **Office of Rail and Road (24/11/2025):**

The Office of Rail and Road (ORR) has no comment on the proposals except to say that if delivering the project is likely to impact the operation of a nearby railway, Network Rail needs to be consulted if they haven't been already.

5.3.12 **Network Rail (16/12/2025)**

Motspur Park railway station has recently undergone significant improvements to provide Access for All. As such, the station is able to support the needs of all passengers, and we encourage future occupiers of the development to use the station. The northern entrance is close to West Barnes Lane Level Crossing. To minimise impacts on the crossing, both safety-wise and to reduce local congestion caused by barrier downtime, the requirement for the northern entrance to be pedestrian and cycle only must remain in perpetuity.

We note the northern entrance will be used for construction vehicles. A dedicated system should be in place during construction to provide clear direction for every construction vehicle into and out of the site to ensure these vehicles do not turn left over the Level Crossing on exit, or approach the site from the west over the Level Crossing. This is in the interests of railway safety. NR would support a condition on this matter. Additionally, NR wish to explore the development providing a contribution towards additional secure cycle storage at Motspur Park station, as some occupiers may choose to cycle if they are reside towards the southern end of the site.

Due to the close proximity of the proposed development to Network Rail's land and the operational railway, Network Rail requests the applicant / developer engages Network Rail's Asset Protection and Optimisation (ASPRO) team prior to works commencing. This will allow our ASPRO team to review the details of the proposal to ensure that the works can be completed without any risk to the operational railway.

The applicant / developer may be required to enter into an Asset Protection Agreement to get the required resource and expertise on-board to enable approval of detailed works.

To start the process with our Asset Protection team, the applicant / developer should use the Asset Protection Customer Experience (ACE) system found on Network Rail's Asset Protection website (<https://www.networkrail.co.uk/running-the-railway/looking-after-the-railway/asset-protection-and-optimisation/>). This website also provides

more information about our Asset Protection team and the services they offer.

Where applicable, the applicant must also follow the attached Asset Protection informatives. The informatives are issued to all development within close proximity to the railway (compliance with the informatives does not remove the need to engage with our ASPRO team).

Informatives

The developer must ensure that their proposal, both during construction and after completion does not:

- encroach onto Network Rail land
- affect the safety, operation or integrity of the company's railway and its infrastructure
- undermine its support zone
- damage the company's infrastructure
- place additional load on cuttings
- adversely affect any railway land or structure
- over-sail or encroach upon the air-space of any Network Rail land
- cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future

Network Rail strongly recommends the developer complies with the following comments and requirements to maintain the safe operation of the railway and protect Network Rail's infrastructure.

Future maintenance

The applicant must ensure that any construction and subsequent maintenance can be carried out to any proposed buildings or structures without adversely affecting the safety of/or encroaching upon Network Rail's adjacent land and air-space. Therefore, any buildings are required to be situated at least 2 metres (3m for overhead lines and third rail) from Network Rail's boundary.

This requirement will allow for the construction and future maintenance of a building without the need to access the operational railway environment. Any less than 2m (3m for overhead lines and third rail) and there is a strong possibility that the applicant (and any future resident) will need to utilise Network Rail land and air-space to facilitate works as well as adversely impact upon Network Rail's maintenance teams' ability to maintain our boundary fencing and boundary treatments. Access to Network Rail's land may not always be granted and if granted may be subject to railway site safety requirements and special provisions with all associated railway costs charged to the applicant.

As mentioned above, any works within Network Rail's land would need approval from the Network Rail Asset Protection Engineer. This request

should be submitted at least 20 weeks before any works are due to commence on site and the applicant is liable for all associated costs (e.g., all possession, site safety, asset protection presence costs). However, Network Rail is not required to grant permission for any third-party access to its land.

Plant & Materials

All operations, including the use of cranes or other mechanical plant working adjacent to Network Rail's property, must at all times be carried out in a "fail safe" manner such that in the event of mishandling, collapse or failure, no plant or materials are capable of falling within 3.0m of the boundary with Network Rail.

Drainage

Storm/surface water must not be discharged onto Network Rail's property or into Network Rail's culverts or drains except by agreement with Network Rail. Suitable drainage or other works must be provided and maintained by the Developer to prevent surface water flows or run-off onto Network Rail's property. Proper provision must be made to accept and continue drainage discharging from Network Rail's property; full details to be submitted for approval to the Network Rail Asset Protection Engineer. Suitable foul drainage must be provided separate from Network Rail's existing drainage. Soakaways, as a means of storm/surface water disposal must not be constructed within 20 metres of Network Rail's boundary or at any point which could adversely affect the stability of Network Rail's property. After the completion and occupation of the development, any new or exacerbated problems attributable to the new development shall be investigated and remedied at the applicants' expense.

Scaffolding

Any scaffold which is to be constructed within 10 metres of the railway boundary fence must be erected in such a manner that at no time will any poles over-sail the railway and protective netting around such scaffold must be installed. The applicant/applicant's contractor must consider if they can undertake the works and associated scaffold/access for working at height within the footprint of their property boundary.

Piling

Where vibro-compaction/displacement piling plant is to be used in development, details of the use of such machinery and a method statement should be submitted for the approval of the Network Rail's Asset Protection Engineer prior to the commencement of works and the works shall only be carried out in accordance with the approved method statement.

Fencing

In view of the nature of the development, it is essential that the developer provide (at their own expense) and thereafter maintain a substantial, trespass proof fence along the development side of the existing boundary fence, to a minimum height of 1.8 metres. The 1.8m fencing should be adjacent to the railway boundary and the developer/applicant should make provision for its future maintenance and renewal without encroachment upon Network Rail land. Network Rail's existing fencing / wall must not be removed or damaged and at no point during or post construction should the foundations of the fencing or wall or any embankment therein, be damaged, undermined or compromised in any way. Any vegetation within Network Rail's land boundary must not be disturbed. Any fencing installed by the applicant must not prevent Network Rail from maintaining its own fencing/boundary treatment.

Lighting

Any lighting associated with the development (including vehicle lights) must not interfere with the sighting of signalling apparatus and/or train drivers' vision on approaching trains. The location and colour of lights must not give rise to the potential for confusion with the signalling arrangements on the railway. The developers should obtain Network Rail's Asset Protection Engineer's approval of their detailed proposals regarding lighting.

Noise and Vibration

The potential for any noise/vibration impacts caused by the proximity between the proposed development and any existing railway should be made aware to the future occupiers of the site. It must also be assessed in the context of the National Planning Policy Framework which holds relevant national guidance information.

The current level of usage may be subject to change at any time without notification including increased frequency of trains, night-time train running and heavy freight trains. The appropriate building materials should be used to reduce any potential noise disturbance from the railway.

Vehicle Incursion

Where a proposal calls for hard standing area/parking of vehicles area near the boundary with the operational railway, Network Rail would recommend the installation of a highways approved vehicle incursion barrier or high kerbs to prevent vehicles accidentally driving or rolling onto the railway or damaging lineside fencing.

Landscaping

Any trees/shrubs to be planted adjacent to the railway boundary these shrubs should be positioned at a minimum distance greater than their predicted mature height from the boundary. Certain broad leaf deciduous species should not be planted adjacent to the railway boundary as the species will contribute to leaf fall which will have a detrimental effect on the safety and operation of the railway. Network Rail wish to be involved in the approval of any landscaping scheme adjacent to the railway. Any hedge planted adjacent to Network Rail's boundary fencing for screening purposes should be so placed that when fully grown it does not damage the fencing or provide a means of scaling it. No hedge should prevent Network Rail from maintaining its boundary fencing. If required, Network Rail's Asset Protection team are able to provide more details on which trees/shrubs are permitted within close proximity to the railway.

If you would like to discuss any of the above, please contact AssetProtectionSouthern@networkrail.co.uk.

Property Informatives

Property Rights

Whilst not a planning matter, we would like to remind the applicant of the need to identify and comply with all existing rights on the land. Network Rail request all existing rights, covenants and easements are retained unless agreed otherwise with Network Rail.

Notwithstanding the above, if any property rights are required from Network Rail in order to deliver the development, Network Rail's Property team will need to be contacted.

Shared Value

It should be noted that where any Network Rail land, rights over Network Rail land, interfaces with Network Rail's land or rights, or variations to Network Rail's land or rights, is required for the facilitation, delivery, or operation of a development, Network Rail will act in accordance with its Shared Value Policy. Network Rail's Shared Value Policy is available online, or via request to Network Rail Property. Network Rail's Southern Property Team would advise parties seek to raise Shared Value early in discussion with Network Rail, but reserve the right to implement the Shared Value Policy at any time during discussions.

If a Network Rail Southern Property contact is required, please contact southernproperty@networkrail.co.uk

Our drainage team have the following to add, regarding drainage:

- This site sits within a medium pluvial catchment that conveys water towards Motspur Park Station. Due to the constraints for draining the site please can you provide a response for the following:
- As the hydraulic calculations suggests a risk for exceedance of system capacity for a 1 in 100yr +40%CC and/ or 1 in 30yr +40%CC, can you please demonstrate that in the event of the system surcharging, with the attenuation tanks potentially at capacity that this will not increase flood risk on the railway directly adjacent to the development, nor increase risk further downstream at Motspur Park Station as a result of unchecked flow of water.
- Can you confirm where surface water (SW) would drain to should the system exceed capacity..
- As pump failure is assessed as a part of the hydraulic model, has this had a large impact on the results?
- Has the potential use of rainwater harvesting been included in the hydraulic model or a separate model/ assessment that has not been included in the published results, and if so, has this made a noticeable difference?
- Post development, can you please clarify whether the bioretention areas sit on the SW flow routes, or are they designed as overflow storage in the event of system exceedance?

Officer comment:

The applicant has responded to Network Rail (applicant comments in bold)

- As the hydraulic calculations suggests a risk for exceedance of system capacity for a 1 in 100yr +40%CC and/ or 1 in 30yr +40%CC, can you please demonstrate that in the event of the system surcharging, with the attenuation tanks potentially at capacity that this will not increase flood risk on the railway directly adjacent to the development, nor increase risk further downstream at Motspur Park Station as a result of unchecked flow of water. **The site levels are designed to fall away from the western boundary (adjacent the railway) toward Beverley Brook along the eastern site boundary, with the surface water strategy following the site levels to discharge into the brook via a series of headwalls. The surface water drainage strategy has been designed to not impact adjacent developments / property to align with NPPF guidance.**

- Can you confirm where surface water (SW) would drain to should the system exceed capacity. **The surface water drainage strategy is designed to outfall into the Beverley Brook via 5no. headwalls noted on the drawings.**
- As pump failure is assessed as a part of the hydraulic model, has this had a large impact on the results? **Of the 5 outfall locations, only the drained area associated with HW4 (Blocks A, B & C) requires pumping. This is due to the downstream level (of the drainage network) which is below the discharge invert level at HW4. The hydraulic model has been assessed for pump failure to ensure no flooding.**
- Has the potential use of rainwater harvesting been included in the hydraulic model or a separate model/ assessment that has not been included in the published results, and if so, has this made a noticeable difference? **Rainwater harvesting is currently being assessed. The development site is heavily constrained with little available space and steep gradients which complicates the location of a rainwater harvesting tank.**
- Post development, can you please clarify whether the bioretention areas sit on the SW flow routes, or are they designed as overflow storage in the event of system exceedance? **The development site, noted in a prior point, is heavily constrained with steep site levels, falling from the western boundary (adjacent railway) toward Beverley Brook. The bioretention zones are located lower than the building levels to capture overland flows, while still enabling a connection to the below ground surface water drainage network to ensure run-off is managed with a restricted run-off rate at the outfall locations. These bioretention zones are intended to provide additional surface water storage in the event of exceedance, and to support the below ground attenuation drainage features.**

5.3.14 Network Rail (drainage – further comments) (05/02/2026)

Thank you very much for taking the time to respond to my questions. In which case I have no further concerns to raise and am satisfied with the proposal.

Should rainwater harvesting become a viable option, please can you forward any documents or analysis regarding this for my awareness.

5.3.15 Thames Water (01/12/2025)

Waste Comments:

Public sewers are crossing or close to your development. Build over agreements are required for any building works within 3 metres of a public sewer and, or within 1 metre of a public lateral drain. This is to

prevent damage to the sewer network and ensures we have suitable and safe access to carry out maintenance and repairs. Please refer to our guide on working near or diverting our pipes: <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>. Please ensure to apply to determine if a build over agreement will be granted.

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

Connecting directly into a trunk or chemical sewer can be complex and dangerous, therefore they should only be considered where no alternative points of connection to local sewers are available. We don't allow connections to trunk sewers in greater London – instead, you will need to choose an alternative point of connection to a non-trunk sewer or requisition a new connection and associated 2 pipe laying from us. If you apply for a requisition we'll select a suitable connection point, which may not be your preferred connection point. Where a connection into a trunk or chemical sewer is necessary, we will insist on carrying out the work ourselves and recharge you under Section 107 of the Water Industry Act 1991. An application to connect must be submitted to Thames Water developer services as early as possible to allow time to conduct technical reviews and surveys as required – costs will apply. Please see more information on the application process for connecting into a trunk or chemical sewer <https://developers.thameswater.co.uk/Domestic-and-small-commercial/Wastewater/Connecting-to-a-trunk-or-chemical-sewer>

Thames Water would advise that with regard to the COMBINED WASTE WATER network capacity, we would not have any objection to the above planning application, based on the information provided.

The application indicates that SURFACE WATER will NOT be discharged to the public network and as such Thames Water has no objection, however approval should be sought from the Lead Local Flood Authority. Should the applicant subsequently seek a connection to discharge surface water into the public network in the future then we would consider this to be a material change to the proposal, which would require an amendment to the application at which point we would need to review our position.

Water Comments:

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. As such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development” The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

5.3.16

MET Secured By Design

This application is for a super scale development that covers both Kingston and Merton boroughs. My recommendations have been made in conjunction with the Kingston DOCO and for ease of understanding will cover the proposal in its entirety.

My office has had consultation with the architect & developer prior to this application. During the meeting we covered how security and Secured by Design (SBD) methods could be incorporated into the layout and design of this development. Due to the size and scope of this development, if successful with this application I would recommend continued consultation throughout.

Crime Statistics

For the year ending June 2025, the crime rate in Merton was lower than average for The Metropolitan Police force area with 66.75 reported crimes per one thousand residents. The average crime rate across London is currently 105.69 crimes per one thousand residents for this time period. This development would fall under the West Barnes policing ward within the London borough of Merton. As a London borough crime and the fear of crime can be considered high.

The top ten crime types for the West Barnes Ward, October 2024–September 2025 are as shown below. Violence and sexual offences are the highest reported crime type with Anti-social behaviour second. Burglary, robbery, vehicle and cycle crime are currently on the increase both within the ward and across London as a whole.

General Recommendations

Secured by Design (SBD) is an initiative that works to improve the security of buildings and their immediate surroundings to provide safe

places to live, work, shop and visit. SBD is the Police Preferred Specification and provides a recognised standard for all security products that can deter and reduce crime.

SBD has produced a series of Design Guides to assist the building, design and construction industry to incorporate security into developments. It is therefore recommended that the applicant consider the appropriate best practice design guidance and approved tested products which can be found at the Secure by Design website: <https://www.securedbydesign.com>.

Approved document Q (ADQ) specifies that windows and doors must meet a basic minimum security specification. However, this may not be adequate for developments in London where typically there is a bigger crime risk. It should be noted compliance with SBD specification is more comprehensive than ADQ, so achieving SBD accreditation will also satisfy this building regulation requirement.

Design considerations

I recommend the following security features be addressed / included:

Ø Where footpaths run next to buildings or roads, the path shall be open to view. This does not prevent planting but will influence the choice of species and the density of planting. Where space permits, they shall be at least 3 metres wide (to allow people to pass without infringing personal space and to accommodate passing wheelchairs, bicycles and mobility vehicles)

Ø It is proposed to introduce new access points on to the development. Without careful design these can be misused. Without proper mitigation these points can lead to ASB and may be used by mopeds and scooters to evade detection from police or by delivery riders who are unaware of the designated vehicle access only being south of the site. Clear signage and appropriate mitigation measures such as a barrier will restrict scooters and mopeds. I note bollards have been indicated on some of the submitted documents, but this is unlikely to prevent 2-wheel vehicles sufficiently.

Textured paving is recommended at the opening of each access point to slow the speed of cyclists and acts as another physical deterrent to motor powered bikes. E-scooters and e-bikes cause significant issues on our footpaths and roadways. Textured paving acts as a physical and visual indicator that persons are entering a pedestrian area and are recommended. The Violence Against Women and Girls agenda should also be considered. These routes must have good sight lines, be well lit, have CCTV capabilities and provide opportunities for both passive and active surveillance. Further detailed design is required in order to adequately review these proposals.

Ø The parking area to the west is vulnerable as this is located in what could be considered the rear of the site. Additional lobbies have been introduced to aid with activation, whilst this is encouraged consideration should also be given to the layout of the overlooking properties to provide natural surveillance from active rooms. Suitable lighting and CCTV should also be put in place to aid with discouraging criminality and providing reassurance to residents.

Ø Good signage identifying each block and maps of the entire site should be put in prominent positions to allow for easy wayfinding. Routes should be clearly marked and positively lit in line with current VAWG strategies.

Ø There should be separation between pedestrians and cyclists. Mitigation should be considered to slow cyclists to minimise conflict between them and pedestrians. With the introduction of electric cycles and scooters that are capable of reaching speeds of up to 30 mph and their widespread use by not only criminals but also delivery companies, speed reducing measures should be considered. This can be achieved by textured paving, creative planting, planters or by physical cycle mitigation measures amongst others.

Ø Traffic calming measures should be considered to help safeguard pedestrians and cyclists along vehicle routes on this site.

Ø ANPR and parking strategies should be put in place to reduce the use of vehicles in anti-social behaviour and to prevent unauthorised vehicles using and parking within the footprint of the site.

Ø Vehicle barriers should be put in place to protect pedestrian only areas. Areas such as below could be at risk if suitable vehicle mitigation to the appropriate standard, such as barriers or bollards are not put in place at either end. There is currently none shown and with the access road leading straight on to this area, this would allow a substantial amount of speed to be generated before arriving here. Whether intentional or accidental the risk of vehicle incidents should be removed.



Ø Any boundary fencing and associated gates should be a minimum height of 1.8 metres and certified to one of the following standards:

- o LPS 1175 Issue 8 Security Rating B3, or
- o 63 STS 202 Issue 12 Burglar Resistance BR2, or
- o Sold Secure SS323 Silver, or
- o LPS 1673 Issue 1 Attack Rating AR.A180, or
- o LPS 1175 Issue 7* Security Rating 2, or
- o STS 202 Issue 9, 10 or 11** Burglar Resistance BR2

Ø Play areas should be located in areas of good natural surveillance from nearby dwellings and provide accessible routes for users to come and go. Areas designed for young children should be fenced to a minimum height of 1.2m.

Ø Shrubs should be selected to have a mature growth height no higher than 1 metre, and trees should have no foliage, epicormic growth or lower branches below 2.4 metres thereby allowing a 1.4 metre clear field of vision. Shrubs should ideally be long stemmed to prevent dense areas of planting which can hide weapons or drugs. All upper canopies should be maintained to ensure they do not interfere with the lighting spread or any CCTV coverage.

Ø The design of the Northern Access route should be carefully considered to maintain good sight lines and remove places of concealment. Planting should be kept low and back from the footpath where possible with long stemmed plants being used to reduce dense areas of landscaping. Seating areas should be set back where space permits to allow room to pass. The lighting scheme here should be carefully considered to balance ecology and the need for a good light spread to provide reassurance to those using this area during the hours of darkness.

Ø Any benches should be of a sturdy design that will limit the ability to lounge on them to make sure the space can be used by all. I also recommend that arm rests are positioned centrally on the bench to enable those who are less physically able to lift themselves up. Benches should not be located opposite one another and where possible set back from the main footpath, to allow space to pass without feeling intimidated. Any outside tables or seating areas should not be permanent and have the ability to be stored securely inside a building or other secure structure.

Ø The communal doorsets to be SBD approved, tested and certificated or an agreed equivalent. Any access control at the communal door must be Audio/Visual and operated by a zoned/ encrypted fob system. In some cases, an additional CCTV camera can be placed at the entrance if the angle of view (due to DDA requirements) is insufficient to identify visitors on entry. Any trades buttons must be disconnected.

This is strongly recommended as we still consistently see these buttons taken advantage of, and illegitimate access gained causing significant issues in developments within Merton.

Ø Traditional drop key systems for fire access are not permitted. Access control boxes supplemented by a Premises Information Box should be used as an alternative.

Ø A secure airlock or lobby area is required to prevent tailgating into the building. This means that a person enters through 2 secure doors with post boxes positioned inside the lobby area. This method provides dual redundancy in the event the outer door is compromised or not functioning. The secondary door is positioned before the lift lobby and stair core to prevent unwanted access into the block.

Ø Postal and parcel delivery strategies should be considered as parcel theft is currently one of the most reported crimes within London. Mail delivery facilities should be certified to technical standard 009 (TS009). I suggest considering dedicated parcel delivery boxes within the secure lobby or having a local collection point such as a community hub for parcel delivery.

Ø Any doors providing internal access from bin or cycle stores should meet one of the following standards and form part of the access control strategy.

- o LPS 1175 Issue 7 Security Rating 2+, or
- o LPS 1175 Issue 8 Security Rating B3+, or
- o LPS 2081 Issue 1 Security Rating B+, or
- o PAS 24:2022 / 2024 or
- o STS 201 Issue 15 Burglar Resistance BR2, or
- o STS 202 Issue 10 Burglar Resistance BR2, or
- o STS 222 Issue 2 Burglar Resistance BR2(S)

Ø There are numerous fire escape doors. These should be alarmed to sound if the door is used. This will alert any persons to possible danger but also alert residents to any misuse and increase detection of perpetrators. It is advised that CCTV is installed at fire escapes, especially in vulnerable areas.

Ø All doorsets allowing direct access into the flats, e.g. front and patio doors, as well as easily accessible windows and balcony doors should be SBD approved, tested and certificated to one of the following minimum standards, or above:

- o LPS 1175 Issue 7 Security Rating 2+, or
- o LPS 1175 Issue 8 Security Rating B3+, or
- o LPS 2081 Issue 1 Security Rating B+, or
- o PAS 24:2022 / 2024 or
- o STS 201 Issue 15 Burglar Resistance BR2, or
- o STS 202 Issue 10 Burglar Resistance BR2, or
- o STS 222 Issue 2 Burglar Resistance BR2(S)

Ø Compartmentalisation access control. The Secure By Design Residential Guide 2025 advises that any development of 26 residential units or more should be compartmentalised to limit permeability within a block. Fobs will be encrypted to allow only those that reside in a specific area to access this area and associated cycle and bin stores.

Ø Internal layout of each unit to allow for 'active rooms' to be orientated to each side of the building. This will increase natural surveillance across the site.

Ø Bicycle parking facilities shall be limited to the storing of no more than seventy bikes; if larger numbers need to be stored at the same location, the facilities shall be separated into discrete units and be subject to extra mitigating security measures. The minimum-security rating for the cycle store doors must be LPS 1175 Issue 7 Security Rating 2+.

Ø Residents should be allocated a specific cycle and bin store to use and their fob to provide access only to these stores. This will create a sense of ownership and enable the management agency to manage misuse and allegations of crime in these spaces with greater ease.

Ø The minimum-security rating for the bin store doors must be LPS 1175 Issue 7 Security Rating 2+.

Ø Public space cycle parking should be in an area with good natural surveillance with parking systems that provide good anchor points for

the pedal cycles. These should also be well illuminated. These should be within 50m of sight from 'active' rooms of dwellings.

Ø To discourage charging of mobile phones, scooters and e-bikes and any accompanying anti-social gatherings in communal areas, all 13-amp outlets or dedicated USB charging points intended for use by cleaners and building maintenance staff should be capable of being key locked in the off position to prevent misuse. The installation and product types should all comply with the appropriate requirements of BS 7671:2018+A2:2012 Requirements for Electrical installations.

Ø Plant and maintenance doors to be tested and certified to one of the following standards:

- o LPS 1175 Issue 7 Security Rating 2+, or
- o LPS 1175 Issue 8 Security Rating B3+, or
- o LPS 2081 Issue 1 Security Rating B+, or
- o PAS 24:2022 / 2024 or
- o STS 201 Issue 15 Burglar Resistance BR2, or
- o STS 202 Issue 10 Burglar Resistance BR2, or
- o STS 222 Issue 2 Burglar Resistance BR2(S)

Ø Any louvres would ideally be steel as aluminium can be easily distorted. If aluminium is used, I'd recommend that a mesh is affixed on the inside. This not only provides an extra layer of security but has the bonus of stopping pests and rodents.

Ø Roof access should be secured and used for maintenance access only.

Ø The community clubhouse space should be managed to ensure that only members or those with permission can access the inner areas. The clubhouse entrance and the resident's entrance should be separate to prevent parcel theft, conflict and to protect vulnerable residents.

Ø Appropriate and useable lighting is integral to the wellbeing and safety of legitimate users of all the spaces. Lighting is one of the most important tools used in crime prevention and detection of crime. A lighting scheme that has been correctly designed and installed by appropriately qualified persons is essential in the functionality of this development. Bollard lighting is for wayfinding only and should only be used to compliment a lighting scheme that achieves BS 5489-1.

Ø CCTV can help deter crime and criminal behaviour and provide reassurance for residents. It can also provide key evidence of any criminal activity. I therefore recommend a CCTV strategy around the site. This should be designed and installed

by a contractor and a certificate confirming that the CCTV installation is compliant with BS 7958:2015 CCTV management and operation and meets the requirements of GDPR. The contractor will also be required to issue an NSI or SSAIB certificate of compliance.

Ø A crucial factor in the success of any development will be the ongoing management and maintenance implemented by the managing agent. In order to prevent street crime and to preserve a safe and welcoming environment for users and resident's elements such as graffiti, criminal damage, vandalism and litter that could easily detract from the public and private realm often need constant vigilance and effective clean up measures. We always recommend that there is a comprehensive management plan in place so that these items are considered.

Ø This development / application has cycle storage facilities and / or areas that may require the charging and storage of Lithium-ion powered vehicles or devices, within the building or the wider site footprint. The developer or developer's agent must be aware that it is their responsibility to inform the Responsible Person(s), Fire and Rescue Service and Building Control of these storage facilities and areas, to ensure that the necessary fire suppression measures for the charging and storage of lithium-ion products have been considered and specified.

Ø As with any development these recommendations are not exhaustive, and further consultation would be encouraged once the detailed design stage is reached. Please note for all products requiring certification the manufacturer or fabricator supplying the finished product to site is required to present independent third-party certification from a single UKAS accredited certification body satisfying all the performance elements.

All door and window styles and components will need to be adequately described within the scope of certification and accompanying Technical Schedule.

Recommendations

Crime Prevention and community safety are material considerations. If The London Borough of Merton are to consider granting consent, I would seek that the following conditions be attached. This is to mitigate the impact and deliver a safer development in line with the Merton New

Local Plan (Stage 3), the London Plan, Section 17 Crime and Disorder Act 1988 and National Planning Policy Framework (NPPF).

Suggested two part condition wording:-

A. The development hereby permitted shall incorporate security measures to minimize the risk of crime and to meet the specific security needs of the development in accordance with Secured by Design. Details of these measures shall be submitted to and approved in writing by the local planning authority prior to commencement of the development and shall be implemented in accordance with the approved details prior to occupation.

Reason: In order to achieve the principles and objectives of Secured by Design to improve community safety and crime prevention in accordance with Policy: Chapters 01B & 01C Merton New Local Plan, Policy D11 London Plan, Section 17 Crime and Disorder Act 1988 and National Planning Policy Framework (NPPF).

B. Prior to occupation a Secured by Design final certificate shall be submitted to and approved by the Local Planning Authority. The submission may include a phasing plan for the relevant phase, that clearly shows the part of the site that the Secured by design certificate relates to or the borough to which it refers.

Reason: In order to achieve the principles and objectives of Secured by Design to provide a safer environment for future residents and visitors to the site and reduce the fear of crime in accordance with Policy: Chapters 01B & 01C Merton New Local Plan, Policy D11 London Plan, Section 17 Crime and Disorder Act 1988 and National Planning Policy Framework (NPPF).

The inclusion of any such conditions would assist to reassure local residents and police that security is a material consideration of the developer.

These conditions should be applied in tandem with my colleagues' request for conditions to be applied with Kingston's Planning Office, ref: 25/02562/FUL.

Conclusion

This is a large development and all efforts should be made to ensure that this is as safe and secure as possible to help combat crime and promote safety and wellbeing for any future residents.

I would ask that my interest in this planning application is noted and that I am kept apprised of any further developments.

If you require clarification or wish to discuss any aspect of the SBD accreditation, please do not hesitate to contact me.

5.3.17 **National Grid Electricity Transmission (11/12/2025)**

Regarding planning application 25/P2859, National Grid Electricity Transmission have no objection to the proposal that is nearby to our overhead transmission lines.

The profile drawing attached details the statutory clearances that must be maintained when working near our lines, this along with our guidance documents can be shared with the applicant for their information.

Please note this response is only in reference to National Grid Electricity Transmission assets only. National Gas Transmission (formerly National Grid Gas) should be consulted separately where required.

5.3.18 **CrossRail 2 (27/11/2025)**

Transport for London administers the Crossrail 2 Safeguarding Direction made by the Secretary of State for Transport on 24 March 2015.

Thank you for your letter dated 17 November 2025, requesting the views of the Crossrail 2 Project Team on the above application. I confirm that the application relates to land outside the limits of land subject to consultation by the Crossrail 2 Safeguarding Direction.

I have no comment on the application.

The latest project developments can be found on the Crossrail 2 website www.crossrail2.co.uk

5.3.19 **Historic England GLAAS (07/12/2025)**

Our office recently responded to Kingston LPA regarding a planning application at Motspur Park Gas Holder (25/02562/FUL). The site is located almost entirely within the Royal Borough of Kingston upon Thames. Recommendations made within the recent letter are repeated below:

'Recommendations: Public Benefit Condition The below-ground archaeological potential is low. The archaeological desk-based assessment submitted in support of the current planning application

has recommended that above ground historic building recording be undertaken. Historic building recording of the three 20th-century gas holders was however undertaken in 2023, with the subsequent report compiled in 2024. This information was added to the Greater London Historic Environment Record soonafter and is available for external consultation So a condition for further recording is not necessary. However, the applicant's environmental statement highlights potential for research and education about the industrial heritage of the site for public benefit (6.74) and we have highlighted above the potential and policy justification for heritage-inspired place-shaping. We therefore recommend a public benefit condition be attached to planning permission if granted: No development shall commence until details of an appropriate programme of industrial heritage materials salvage, place-making design, community engagement and interpretation, including a delivery timetable has been prepared in consultation with the Greater London Archaeological Advisory Service and submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved programme.' This response relates solely to archaeological issues.

5.3.20

Environment Agency (10/12/2025)

Environment Agency position

We object to the proposed development as it involves works within 8 metres (m) of the Beverley Brook, a designated main river.

Objection 1: Building next to main river

The proposed development involves development within 8m of the top of the riverbank. Therefore, the proposed development would restrict essential maintenance and emergency access to the watercourse. The permanent retention of a continuous unobstructed area is an essential requirement for future maintenance, upgrade or improvement works, including the necessity for future flood risk management.

Furthermore, there is inadequate information to assess whether the proposed developments will have an adverse impact on the biodiversity of the Beverley Brook. The application does not include adequate information about the measures proposed to assess and address the risk to biodiversity by the proposals. In particular, the application fails to include a defined naturalised buffer zone free from hardstanding.

Reason 1: Flood risk

The London Borough of Merton's Strategic Flood Risk Assessment (SFRA) states that developers should:

"Set development back from rivers, seeking an 8-metre-wide undeveloped buffer strip for development by fluvial watercourses

The proposed development includes balconies, which are considered part of the development as they may obstruct the ability to undertake future maintenance, upgrade or improvement works to the Beverley Brook.

Furthermore, there appears to be a viewing platform which overhangs into the Beverley Brook. This platform is positioned within the Beverley Brook channel itself. This creates a risk of debris catching on the structure which can cause blockages and/or alter the flow regime of the river thus increasing flood risk. The reduction of channel conveyance may also lead to the platform becoming detached and flowing downstream, thus increasing flood risk elsewhere.

This is further supported by the following policies and guidance:

- London Borough of Merton's Local plan – Policy F15.8 Managing Local Flooding
- National Planning Policy Framework (NPPF) - Paragraphs 170, 178 & 181
- Planning Practice Guidance – Paragraphs 020, 021 & 031
- The London Plan – Policy SI12

Reason 2: Biodiversity

The proposed development may have a detrimental effect on the Beverley Brook due to its proposed but unclear close proximity to the river bank. The application does not include a defined naturalised buffer zone free from hardstanding which is necessary to ensure the protection of the Beverley Brook. Land alongside watercourses is particularly valuable for wildlife and it is essential this is protected and enhanced where possible.

Furthermore, the proposals seemingly include development (the proposed viewing platform) within the river channel which may have a detrimental impact on the Beverley Brook's function as a biodiversity corridor. Paragraph 41 of The Habitat Regulations 2017 recognises rivers and their banks as essential for the migration, dispersal and genetic exchange of wild species and the proposed encroachment of the watercourse may disrupt this linear habitat.

This position is supported by paragraphs 187 and 193 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused.

This is further supported by the following policies and evidence:

- London Plan – Policy G6 Biodiversity and access to nature
- London Borough of Merton's Local Plan - Policies D12.3, O15.1 & O15.3

Overcoming our objection

The applicant should also confirm any structures which are proposed within the 8m of the Beverley Brook from the top of the river bank. This includes all types of structures, not just the building footprint.

If any structures are proposed within 8m, the applicant should revise proposals to provide an 8m unobstructed river corridor, measured from the top of the riverbank to the proposed development at its closest point (including any overhanging balconies). This offset should be demonstrated to be a naturalised buffer zone, free of hardstanding.

Objection 2: Inadequate Flood Risk Assessment

The applicant has not demonstrated that the proposed development will be safe for its lifetime from flood risk, without increasing flood risk elsewhere. This is contrary to Paragraph 170 of the National Planning Policy Framework (NPPF). The proposed modifications to the riverbank of the Beverley Brook, as well as the increase in built footprint on site, may lead to an increased flood risk.

The proposed development involves residential development, which is considered 'more vulnerable', in line with Annex 3 of the NPPF. The assumed minimum lifetime of the proposed development is 100 years, in line with Paragraph 006 of the Planning Practice Guidance (PPG).

Whilst the applicant has submitted a model which includes the proposed modifications to the Beverley Brook, we have not reviewed the acceptability of these at this stage.

Overcoming 'Objection 1: Building next to main river' may require amendments to the proposed scheme. As such, any modelling undertaken to support this application may no longer be representative of the proposed scheme and will not be able to demonstrate the requirements of Paragraph 170 of the NPPF.

As such, we have not undertaken a review of the flood modelling submitted to support this application at this stage. We recommend the flood modelling is updated to reflect any amendments that may be required and then is re-submitted for review.

This position is further supported by the following policies and evidence:

- London Plan – Policy SI12 – Flood Risk Management
- London Borough of Merton's Local Plan – Policy F15.8 Managing Local Flooding

Overcoming our objection

The applicant must submit a flood model reflecting the proposed development which demonstrates that the development will be safe for its lifetime from flood risk, without increasing flood risk elsewhere.

Please note, this objection cannot be addressed and overcome until 'Objection 1: Building next to main river' has been overcome.

Informative

Flood Risk Activity Permit

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities> environmental-permits or contact our National Customer Contact Centre on 03702 422 549 or by emailing enquiries@environment-agency.gov.uk. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations.

Please note, if the objections we have raised are overcome, we have conditions related to the protection of groundwater sources from contamination that we request are included on any planning permission provided to ensure the development is in line with national and local policy.

Decision notice

We require decision notice details for this planning application in order to report on our effectiveness in influencing the planning process. Please email kslplanning@environment-agency.gov.uk with any decision notice details.

5.3.21

Environment Agency (25/02/2025)

As part of this reconsultation, we have reviewed the following further submitted information:

- Proposed site/block plan (ref. U096-MAC13-SW-XX-DR-A-005-111000; dated 27 January 2026; by Maccreehan Lavington)

Environment Agency position

We **maintain our objection** due to the submission of an inadequate flood risk assessment (FRA), subject to the review of the submitted flood risk modelling undertaken for the proposed development.

We can **remove our objection** related to concerns with the proximity of the proposed development in relation to the adjacent Beverley Brook, a designated main river.

Objection: Inadequate flood risk assessment (FRA)

The applicant has not demonstrated that the proposed development will be safe for its lifetime from flood risk, without increasing flood risk elsewhere. This is contrary to Paragraph 170 of the National Planning Policy Framework (NPPF). The proposed modifications to the riverbank of the Beverley Brook, as well as the increase in built footprint on site, may lead to an increased flood risk.

The proposed development involves residential development, which is considered 'more vulnerable', in line with Annex 3 of the NPPF. The assumed minimum lifetime of the proposed development is 100 years, in line with Paragraph 006 of the Planning Practice Guidance (PPG).

Whilst the applicant has submitted a model which includes the proposed modifications to the Beverley Brook, reviews and modifications are still being discussed before the model is agreed to demonstrate the proposed development will be safe for its lifetime from flood risk, without increasing flood risk elsewhere.

This position is further supported by the following policies and evidence:

- London Plan – Policy S112 – Flood Risk Management
- London Borough of Merton's Local Plan – Policy F15.8 Managing Local Flooding

Overcoming our objection

The applicant must submit a flood model reflecting the proposed development which demonstrates that the development will be safe for its lifetime from flood risk, without increasing flood risk elsewhere.

Removal of objection: Building next to main river

With the repositioning of most of the balconies to the north and south face of 'Block E', as demonstrated in the updated site/block plan, there is a minimal encroachment to within 8 metres of the top of the riverbank by the proposed development. Therefore, in this instance, we can remove our objection to the proposed development.

We also support the clarification of the proposed buffer zone between the proposed development and the top of the riverbank, which is valuable to biodiversity.

We strongly encourage the applicant to remove the toe boards present along the banks of the Beverley Brook and to deliver further in-channel enhancements. This will add further ecological and aesthetic enhancements to the river channel.

Informative

Flood Risk Activity Permit

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549 or by emailing enquiries@environment-agency.gov.uk. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations.

Please note, if the objection we have raised are overcome, we have conditions to provide that we request are included on any planning permission provided to ensure the development is in line with national and local policy.

5.3.21

Environment Agency (comments in relation to the Merton element of the proposals only) 18/03/2025

Environment Agency position

We can **remove our objection** to the proposed development. Through correspondence, it has been agreed that although this is a cross-boundary application, we will be commenting on the application with the parts of the site located within the London Borough of Merton only within this response.

As a result, we are able to remove our objection as we have no concerns with the proposed works within the London Borough of

Merton (i.e. the access road to the main site, which is located within the Royal Borough of Kingston).

This is independent from the Environment Agency's response to the planning application for the development located within the Royal Borough of Kingston (Environment Agency ref.: SL/2025/124356/03; LPA ref. 25/02562/FUL; dated 10 March 2026).

Informative

Flood Risk Activity Permit

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549 or by emailing enquiries@environment-agency.gov.uk. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Decision notice

We require decision notice details for this planning application in order to report on our effectiveness in influencing the planning process. Please email kslplanning@environment-agency.gov.uk with any decision notice details.

5.3.22

MET Police (02/01/2026)

Summary of comments (see here for full comments: [25P2859 Comments MET Police 02.01.2026.pdf](#)):

£108,110.49 is sought to mitigate the additional impacts of this development because our existing infrastructure does not have the capacity to meet these and because, like some other services, we do not have the funding ability to respond to growth whenever and wherever proposed.

5.3.23

NHS London Healthy Urban Development Unit 19/02/2026

Thank you for consulting us on the abovementioned planning application. NHS HUDU is responding on behalf of NHS South West London ICB, which is responsible for commissioning and overseeing

healthcare in Kingston. The NHS has reviewed the application, including considering the applicant's Health Impact Assessment, and provides the following feedback.

Current Primary Care Estate

The applicant's HIA refers to 15 GP practices within the 1.5km of the site as of September 2025, and that taking account of the 1:1800 GP/Patient benchmark there is capacity for 3,901 patients. As the applicant has not provided the full list of practices considered, we are unable to undertake a like-for-like comparison.

To ensure that the Council has accurate information below is the latest NHS data available on patient registrations (January 2026), practice workforce (November 2025), and GP catchment area (February 2026) data from NHS Digital. This provides an update on the applicant's Health Impact Assessment and only takes account of GP practices with a practice boundary that includes the site.

PCN	Practice Name	GP FTE* *Qualified	Registered Patients	GP/P ratio	Distance to benchmark	Patients LSOA
New Malden & Worcs P.	West Barnes Surgery	3.1	7266	1:2343	+543	0.74%
	Manor Drive Medical Centre	9.7	16484	1:1699	-101	7.5%
Sth Mrtn	Grand Drive Surgery	5.1	8571	1:1260	-540	0.08%

Table 1: GP statistics. Source: Various NHS Digital datasets 2025/6.

The three practices detailed within Table 1 are those GP Practices with a catchment area including the site. Whilst some GP Practices will consider registrations outside of their boundary, GPs are not required to take those patients residing outside of the boundary.

Taking account of the 1:1800 GP/Patient benchmark, Manor Drive Medical Centre and Grand Drive Surgery have capacity. West Barnes Surgery exceeds the benchmark.

Consideration has been given to existing patient registrations at LSOA level to anticipate where residents from this development may choose to register. This shows that most existing patients within the site LSOA have chosen to register at Manor Drive Medical Centre, and opening up the southern site access will make this surgery more accessible.

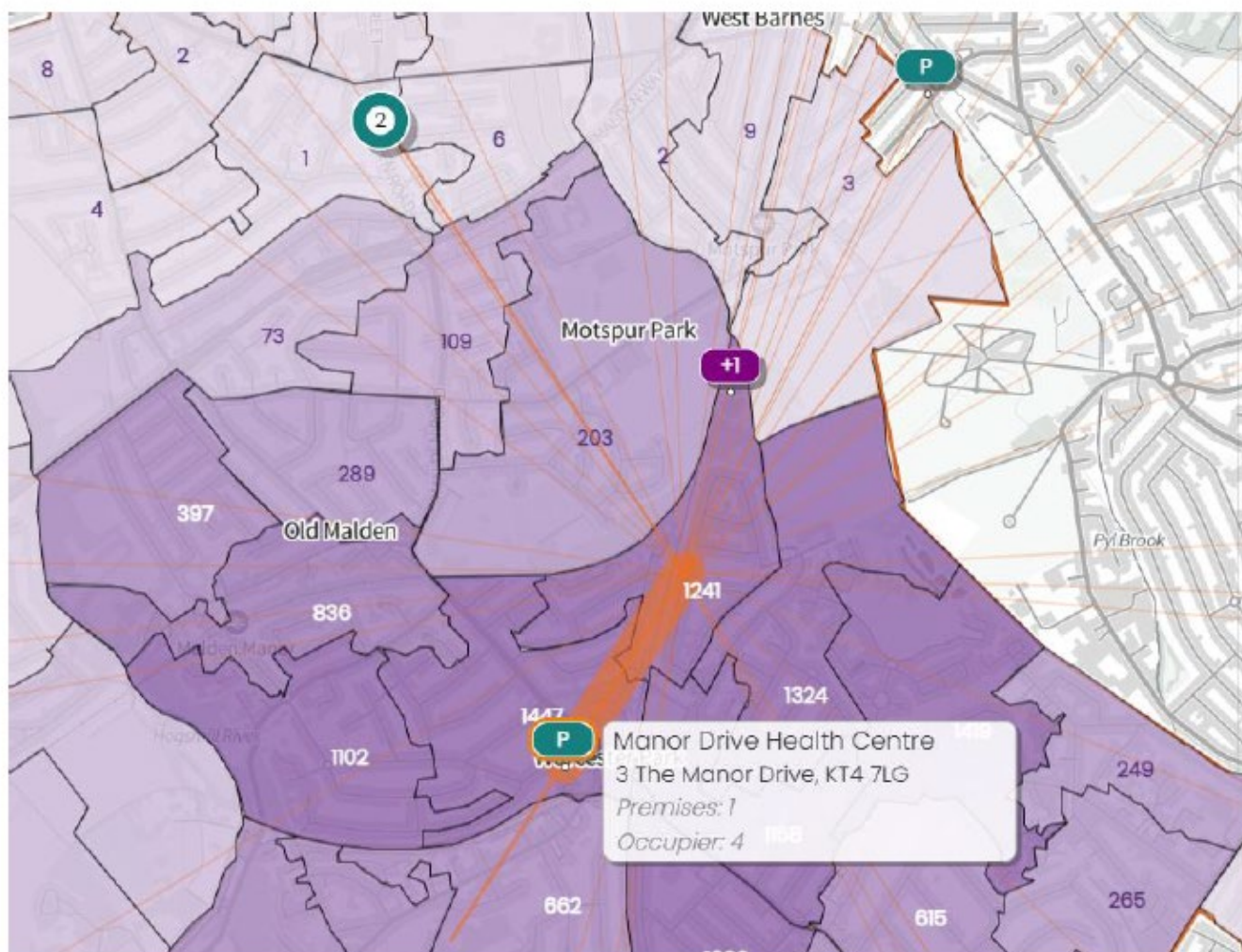


Figure 1: Site (purple Location 1) in relation to the local primary care estate and LSOA registrations. Source: parallel/NHS Digital, 2026.

For completeness I have also reviewed registrations in the LSOA immediately to the north of the site and this confirms clear registration preference for West Barnes Surgery (16% registrations in that LSOA).

Our view is that it is highly unlikely that residents of this development will choose to register at Grand Drive Surgery, despite this having the most capacity. This practice is over 1 mile from the site's northern entrance and residents would have to travel past West Barnes Surgery to visit Grand Drive. The reality is that residents will often choose to register at the closest practice to their home and proximity to services will be an important factor in ensuring the sustainability of this car-light development. In this case the NHS cannot mandate where patients register for primary care.

Modelling Outputs and Capital Requirements

Paragraph 11.3.37 of The London Plan states that Borough's should use the HUDU model to calculate the capital cost of additional health

facilities required to meet demand and secure developer contributions towards this. Kingston has not specified an alternative method of calculating development-specific healthcare impacts in the local plan, therefore the use of the HUDU model complies with The London Plan.

The HUDU model has been used to calculate the additional health infrastructure, enabling development specific modelling to be undertaken based on the development specification (housing mix/tenure and product) together with Borough-specific healthcare and demographic data (i.e. Hospital Episode Statistics and Census data). As such the modelling is bespoke to the development in question and not generic.

The modelling is based on housing and tenure mix provided in your email to HUDU of 17/02/2026.

The modelling anticipates patient population growth of **834** and indicates an additional **66.9sqm** of clinical floorspace would be required in primary care settings to accommodate this. Assuming new build floorspace this equates to a capital contribution of **£592,045**

The patient population growth calculation takes account of residents already being registered with a local GP and is lower therefore than 1288 population growth that the applicant has stated in their HIA.

Assessment

Whilst there are two practices that residents of the development are most likely to register at, the NHS needs to account for healthcare planning needs at a strategic level. The ICB is of the view that it would be able to accommodate and plan for the additional patient demand from this development better at Manor Drive Medical Centre. The ICB would likely look to facilitate the conversion of an existing non-clinical floorspace into clinical floorspace at Manor Drive. The capital costs of such infrastructure provision are lower than new build.

The focus at this time is on primary care, however it is important to note that the development will create additional pressure on acute in-patient and secondary care settings. The HUDU modelling also does not account for acute outpatient, accident & emergency attendance, or ambulance service infrastructure demands.

Request

NHS South West London ICB makes a request a planning obligation to secure £125,000 (index linked) towards primary care infrastructure. This would likely be used towards Manor Drive Medical Centre or another primary care settings in the New Malden and Worcester Park PCN (or its successor) operating at the time of delivery.

Justification

The NHS recommends securing planning contributions via Section 106 to ensure that infrastructure delivery aligns with development and patient population growth. The NHS is not guaranteed to receive CIL funding from the development or the Council more generally, therefore there is no security in delivery of the clinical infrastructure needed to mitigate the impact from this development via CIL. It is also important for the Council to be aware that the NHS Capital Guidance 2025/26 expressly states:

“Capital allocations do not cover additional facilities required due to housing developments. NHS organisations should work with local authorities to secure developer contributions for extra capacity”.

It is also not possible to relocate healthcare infrastructure to follow individual residents as they move home. This further supports the approach HUDU takes to work with Boroughs to calculate and secure development-specific mitigation where healthcare infrastructure capacity constraints have been identified, as in this case. The use of Section 106 contributions towards healthcare commands support in National, Regional, and Local planning policy.

The applicant in their HIA, recommends the use off-site financial contributions to mitigate impact on local primary healthcare infrastructure, and the NHS agrees with this conclusion. Local practices do not have capacity to accommodate the population growth from the development without mitigation.

Additional patient growth, without appropriate mitigation, would disadvantage existing residents' healthcare provision as well as that of the new residents. It is important to note that the process for closing a Practice List to new patient registrations is a complex process and that accepting new patients does not mean that additional patients will not cause longer waits for appointments and potentially poorer health outcomes for Kingston's residents. Increasing capacity within the local primary care estate helps to reduce vehicle trips as residents can access care close to where they live and also can help to encourage walking/cycling as a mode of transport for accessing healthcare, contributing to reduced vehicle trips and the overall sustainability of the development.

Ensuring adequate healthcare access can help to address health inequalities and promote improved health outcomes which supports the outcomes sought by Core Strategy policies CS13 and DM21 and NPPF paragraph 96(c).

Our contribution request is for **£125,000 (index linked)** to be used towards increasing the clinical infrastructure capacity of the healthcare estate in the New Malden and Worcester Park PCN, most likely towards Manor Drive Medical Centre as detailed above.

Concerns have been raised with the NHS outside of this application about the principle of the use of Section 106 contributions towards healthcare infrastructure, and the case of R (University Hospitals of Leicester NHS Trust) v Harborough District Council [2023] has been raised. In response to this, SWL ICB is satisfied that the judgement was case-specific, based on the circumstances of the application and the evidence shared at the time.

The judgment clearly does not prevent health service providers from seeking Section 106 or CIL contributions. Indeed, requests towards infrastructure required to make a development acceptable, such as in this case, can be differentiated from the facts in the 2023 judgment and ought to be supported where these meet the Regulation 122 tests.

For context since the judgement was passed in February 2023, the NHS in London has secured £35m in planning obligations towards healthcare infrastructure, the overwhelming majority of these obligations have used the HUDU model for modelling anticipated demand.

The NHS considers that the contribution would meet the Regulation 122 tests, in that it is:

- Necessary to make the development acceptable in planning terms:

The NHS has evidenced the constrained capacity in local healthcare infrastructure that serves the development, and without mitigation the impacts this would have on existing infrastructure and population. The HUDU model is specified in the Development Plan, specifically The London Plan, as an acceptable method of modelling healthcare infrastructure costs and demand.

- Directly related to the development:

The NHS has used the HUDU model to calculate the anticipated patient population growth and consequential clinical infrastructure demand, based specifically on the development specification as detailed in the application particulars and local census/healthcare usage data, and

- Fairly and reasonably related in scale and kind to the development:

The contribution reflects the projected patient population increases, and specific healthcare provision required for this development.

Conclusion

To conclude the evidence demonstrates that without appropriate mitigation, existing healthcare infrastructure will not be sufficient to serve the needs of the population from this development.

The recommended Section 106 contribution represents a necessary contribution to make the development acceptable and safeguard the quality and accessibility of healthcare for existing and future residents.

Feedback on the overall HIA should be sought from the Council's Public Health team, however HUDU can provide feedback on request.

Please contact me if you or the applicant wishes to discuss our response. As this is a cross-boundary application, I will be sending a copy of this letter to the London Borough of Merton.

Officer comment

The surgeries identified as requiring financial contributions are not within Merton and given that the residential development, which creates the impact on surgeries is within RBK, this matter would most appropriately be assessed by RBK.

5.3.23 **Civil Aviation Authority:**

No comments received.

5.3.24 **Health and Safety Executive**

No comments received.

5.3.25 **London Fire and Civil Defence Authority**

No comments received

5.3.26 **British Transport Police Designing Out Crime Unit (DOCU)**

Designing Out Crime Unit: Design-OutCrime@btp.police.uk
www.btp.police.uk

Please find comments from the Designing Out Crime Unit of British Transport Police, regarding planning application 25/02562/FUL with

The Royal Borough of Kingston Upon Thames Council and planning application 25/P3101 with London Borough of Merton.

Designs for developments near railway infrastructure must minimise opportunities for trespass, impactful or disruptive behaviour on the railway. Please share the comments below with decision-makers and the applicant and contact us direct for further clarification if needed. Site layout, boundary treatments, and overall design should reduce risk.

25/02562/FUL: 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.

These are our comments, having assessed the following:

The Illustrative Colour Masterplan of 2 October 2025 shows the rail line boundary.

The DAS part 5 refers to cycle, part vehicle and pedestrian movement along the rail boundary on page 34 and to a green buffer on page 35. The Landscape Design Statement (part 1) references vehicular access, servicing and parking on page 14, retention of existing trees outside the red line boundary on page 15; and hedge and climbing plant screening along the railway boundary on page 23.

- Existing trees on the rail boundary require adequate, safe maintenance zones.
- Any proposed tree planting adjacent to the rail line boundary should be species that do not grow toward or over the rail line boundary fence and do not present risks from falling leaves, root intrusion or potential climbing access opportunities.
- Parking along the rail line boundary fence must be avoided to prevent vehicles being used as climbing aids.
- All new lighting on the rail line boundary must avoid any potential interference with railway signal visibility, railway CCTV systems, or operational safety through unwanted light spill.
- The increase footfall will likely increase at the level crossing. Additional signage and fence treatments may be required as Network Rail are consulted.

To deter unauthorised access to the rail line, a suitable boundary treatment is required along and beyond the section adjoining the rail line. This will help prevent trespass onto the rail line, particularly by individuals unaware of the dangers and associated risks as footfall on the rail line boundary in this area would no doubt increase. We advise a minimum 1.8m-high, welded-mesh boundary fence be installed, compliant with LPS 1175, clear of any features that could function as climbing aids, including lighting columns, signage, parking protection rails, grit bins or similar. Increased height should be considered where retained trees could facilitate access.

We ask that these comments are brought to the attention of the planning committee and copied to the applicant. We would appreciate being consulted when more detailed plans become available.

If we can be of further assistance on this application, please do not hesitate to contact us.

5.3.26

GLA Water memo Stage 1 comments (Circular Economy, Whole Life Carbon Cycle, Energy, Air Quality and Green Infrastructure)

Following on from receiving the Stage 1 report for the Motspur Park Gasholder Site proposals (GLA ref: 2025/0919/S1 and 2025/0979/S1), please find attached the following technical memos, and detailed comments relating to the proposed drainage strategy and water efficiency measures for the scheme:

- Circular Economy;
- Whole Life-cycle Carbon;
- Energy;
- Air Quality (with recommended conditions); and
- Green Infrastructure.

Detailed comments relating to the drainage strategy and water efficiency measures:

Sustainable Drainage (The London Plan 2021 Policy SI.13)

1. The drainage strategy proposes to restrict the runoff from the main development site to 50% brownfield betterment discharge rate (11.9 l/s) and runoff from the northern and southern access road/path to 100-year greenfield runoff rate (6.80 l/s). It has been noted from the LLFA correspondence provided as part of the strategy that brownfield betterment would only be feasible if the need for pumping is eliminated. However, the drainage proposal includes pumping of surface water for one of the outfalls serving Block A, B and C. The applicant should review measures to provide gravity discharge and should consider combination of above and below ground attenuation features. If pumping cannot be eliminated, consideration should be given to the practicality of discharging at

greenfield rate, or three-time greenfield rate, where greenfield runoff rate is not possible.

Attenuation: The drainage strategy proposes to provide the required attenuation within a combination of permeable paving, filter drains and below ground attenuation tanks, which is supported.

2. In terms of SuDS, the drainage strategy proposes brown roofs, filter drains and permeable paving which is welcomed. The strategy also mentions feasibility of swale, however, the extent is not provided on plan. Proposed swale location and extent should be incorporated as part of the drainage proposal. The applicant notes that rainwater harvesting is in consideration, however, confirmation of rainwater harvesting proposal should be provided to satisfy the requirements of The London Plan 2021 Policy SI.13. Measures such as water butts or storage layer within the brown roof to store and reuse the rainwater for irrigation should be considered.
3. The hydraulic model does not consider climate change allowance for 3.3%AEP which is not in line with the EA guidance "Flood risk assessments: climate change allowances". The applicant should consider climate change allowances for both 3.3%AEP and 1%AEP in line with the EA guidance. This should be confirmed as a condition of any approval.
4. The applicant should also provide the completed London Borough's version of the London Sustainable Drainage Proforma.
5. The LPA should also review SuDS maintenance arrangements the, the use of any pump discharges are appropriate.

Conclusion: The surface water drainage strategy for the proposed development does not currently comply with London Plan Policy SI13. The Applicant should review measures to provide gravity discharge and should consider combination of above and below ground attenuation features. If pumping cannot be eliminated, consideration should be given to the practicality of discharging at greenfield rate, or three-time greenfield rate, where greenfield runoff rate is not possible. Rainwater harvesting proposal should be confirmed to satisfy the requirements of The London Plan 2021 Policy SI.13. The Applicant should also provide the completed London Borough's version of the London Sustainable Drainage Proforma.

Water Efficiency (The London Plan 2021 Policy SI.5)

1. The Sustainability Statement notes that the proposed dwellings will target a maximum indoor water consumption of 105 l/person/day, in line with [the Building](#) Regulations, which is welcomed.
2. The Sustainability Statement notes that rainwater harvesting is included as part of the proposed development, however, the drainage strategy does not confirm this. The applicant should

provide confirmation on the rainwater harvesting proposal to reduce consumption of water across the site.

Conclusion: The proposed development could comply with the requirements of London Plan Policy SI5 subject to the mitigation measures / conditions proposed by GLA, as outlined above and below, being accepted by the applicant and relevant stakeholders.

Water efficiency condition: All homes shall be constructed to meet, as a minimum, the higher Building Regulation standard Part G for water consumption limited to 110 litres per person per day (105 litres per person per day for internal use), using the fittings approach.

Prior to first occupation of any dwelling, the applicant shall submit to and obtain written approval from the Local Planning Authority of a Water Efficiency Statement. This statement shall include:

- 1. A schedule of all proposed water fittings (e.g. taps, showers, toilets, appliances), including their specified flow rates or capacities.*
- 2. Manufacturer specifications confirming the water consumption rates of each fitting, demonstrating that all fittings comply with the requirements of the fittings approach under Part G.*

Further GLA comments – 02/02/2026

Energy

General compliance comments:

The applicant has evidenced that the site, although existing within the Heat Network priority Area (HNPA), is proposed to be 3.48 KM from the nearest proposed heat network and 5.82KM from the nearest existing heat network.

It is noted in the supporting evidence of metering provided from Greenside and Westcote that there is evidence of variation in occupant energy bills, particularly in larger units such as 3 beds. This is a concern which has been raised during previous rounds of this consultation.

The applicant is however not proposing any additional quality assurance mechanisms alongside an EAHP approach. The applicant should give greater consideration to quality assurance such as:

- . Fabric accreditation scheme such as Passivhaus or MCS
- . Inclusion of WWHR in 3-bed dwellings
- . Evidence of a minimum 5-year warranty for EAHP systems and a resident issue resolution procedure (including response times and escalation routes).

A minimum of one of these should be secured by condition.

A Post occupancy assessment of EAHP performance should be added to the be seen requirements. This could include the following:
"...in addition, during the same reporting period, the Owner shall submit to the GLA and the Local Planning Authority details of the EAHP performance, including a system performance review (e.g., EAHP efficiency, fault rates, maintenance records).

Overheating

The applicant should quantify the number of units that will require temperature lopping and the expected cooling load associated. The applicant should provide details on the set point and control strategy, to ensure that the system will not be used for comfort cooling.

The commitment to provision of guidance in the home user guide is welcomed.

As already mentioned in the energy memo, ahead of the Stage 2 referral, we would need to review the draft S106 agreement to ensure Be Seen monitoring and carbon offset contribution are appropriately secured.

WLC

No further comments and no further actions are required by the applicant at the planning stage - all previous queries have been responded to, as confirmed in the attached memo.

A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. The template and suggested condition wording are available on the GLA website (<https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>).

Officer comment

Issues of Energy would be assessed by RBK.

5.3.27

GLA stage 1 (01/12/2025)

I refer to the copy of the above planning application, which was received from you on 18 November 2025. On 1 December 2025, Jules Pipe CBE, Deputy Mayor for Planning, Regeneration and the Fire Service, acting under delegated authority, considered a report on this proposal, reference 2025/0979/S1. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Deputy Mayor considers that the application does not yet comply with the London Plan for the reasons set out in paragraph 79 of the

above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.

The application represents EIA development for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations. The environmental information made available to date has been taken into consideration in formulating these comments.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged; or direct the Council under Article 6 to refuse the application; or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send the Mayor a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Lucas Bond, email lucas.bond@tfl.gov.uk

GLA Stage 1 Report

Strategic planning application stage 1 referral Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.
The proposal Cross-boundary residential-led redevelopment to provide 586 residential units (35% affordable by habitable room) in buildings up to 20-storeys in height with landscaped open space and associated works.
The applicant The applicant is Berkeley Homes and the agent is Lichfields.
Strategic issues summary Land use principles: The residential-led redevelopment of this previously developed MOL site is strongly supported in principle. The scheme would meet the NPPF para. 154(g) exceptions test and would not cause substantial harm to the openness of the MOL albeit there would be some greater visual impacts. Benefits associated with the scheme, including affordable housing and biodiversity and ecological improvements could justify this additional impact. Affordable housing: The proposal would deliver 175 affordable housing units (35% by habitable room) with a tenure split of 50% Affordable Rent / 50% Shared Ownership. Subject to acceptable affordable tenures, this offer complies with Policies H4 and H5 and would be eligible to follow the fast-track viability route. Urban design: The proposed layout, scale and massing are generally supported; however, further information and scheme refinements are required in relation to the access strategy into the site with a focus on public safety. Mitigation and ecological enhancement as identified in the Ecological Appraisal should be secured by condition to ensure impacts on SINC are appropriately mitigated. Transport: Concerns regarding the access routes into the site should be further considered to ensure the development can be safely accessed.

Other issues on energy, whole life-cycle carbon, circular economy, sustainable urban drainage, and air quality also require resolution prior to the Mayor's decision making stage.
Recommendation That Royal Borough of Kingston upon Thames and London Borough of Merton be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 79. Possible remedies set out in this report could address these deficiencies.

Full Report here: [PDU Case Report XXXX/YY date](#)

GLA further comments (17/12/2025)

Following on from receiving the Stage 1 report for the Motspur Park Gasholder Site proposals (GLA ref: 2025/0919/S1 and 2025/0979/S1), please find attached the following technical memos, and detailed comments relating to the proposed drainage strategy and water efficiency measures for the scheme:

- Circular Economy;
- Whole Life-cycle Carbon;

- Energy;
- Air Quality (with recommended conditions); and
- Green Infrastructure.

Detailed comments relating to the drainage strategy and water efficiency measures:

Sustainable Drainage (The London Plan 2021 Policy SI.13)

6. The drainage strategy proposes to restrict the runoff from the main development site to 50% brownfield betterment discharge rate (11.9 l/s) and runoff from the northern and southern access road/path to 100-year greenfield runoff rate (6.80 l/s). It has been noted from the LLFA correspondence provided as part of the strategy that brownfield betterment would only be feasible if the need for pumping is eliminated. However, the drainage proposal includes pumping of surface water for one of the outfalls serving Block A, B and C. The applicant should review measures to provide gravity discharge and should consider combination of above and below ground attenuation features. If pumping cannot be eliminated, consideration should be given to the practicality of discharging at greenfield rate, or three-time greenfield rate, where greenfield runoff rate is not possible.

Attenuation: The drainage strategy proposes to provide the required attenuation within a combination of permeable paving, filter drains and below ground attenuation tanks, which is supported.

7. In terms of SuDS, the drainage strategy proposes brown roofs, filter drains and permeable paving which is welcomed. The strategy also mentions feasibility of swale, however, the extent is not provided on plan. Proposed swale location and extent should be incorporated as part of the drainage proposal. The applicant notes that rainwater harvesting is in consideration, however, confirmation of rainwater harvesting proposal should be provided to satisfy the requirements of The London Plan 2021 Policy SI.13. Measures such as water butts or storage layer within the brown roof to store and reuse the rainwater for irrigation should be considered.
8. The hydraulic model does not consider climate change allowance for 3.3%AEP which is not in line with the EA guidance "Flood risk assessments: climate change allowances". The applicant should consider climate change allowances for both 3.3%AEP and 1%AEP in line with the EA guidance. This should be confirmed as a condition of any approval.
9. The applicant should also provide the completed London Borough's version of the London Sustainable Drainage Proforma.
10. The LPA should also review SuDS maintenance arrangements the, the use of any pump discharges are appropriate.

Conclusion: The surface water drainage strategy for the proposed development does not currently comply with London Plan Policy SI13. The Applicant should review measures to provide gravity discharge and should consider combination of above and below ground attenuation features. If

pumping cannot be eliminated, consideration should be given to the practicality of discharging at greenfield rate, or three-time greenfield rate, where greenfield runoff rate is not possible. Rainwater harvesting proposal should be confirmed to satisfy the requirements of The London Plan 2021 Policy SI.13. The Applicant should also provide the completed London Borough's version of the London Sustainable Drainage Proforma.

Water Efficiency (The London Plan 2021 Policy SI.5)

3. The Sustainability Statement notes that the proposed dwellings will target a maximum indoor water consumption of 105 l/person/day, in line with [the Building](#) Regulations, which is welcomed.
4. The Sustainability Statement notes that rainwater harvesting is included as part of the proposed development, however, the drainage strategy does not confirm this. The applicant should provide confirmation on the rainwater harvesting proposal to reduce consumption of water across the site.

Conclusion: The proposed development could comply with the requirements of London Plan Policy SI5 subject to the mitigation measures / conditions proposed by GLA, as outlined above and below, being accepted by the applicant and relevant stakeholders.

Water efficiency condition: All homes shall be constructed to meet, as a minimum, the higher Building Regulation standard Part G for water consumption limited to 110 litres per person per day (105 litres per person per day for internal use), using the fittings approach.

Prior to first occupation of any dwelling, the applicant shall submit to and obtain written approval from the Local Planning Authority of a Water Efficiency Statement. This statement shall include:

3. *A schedule of all proposed water fittings (e.g. taps, showers, toilets, appliances), including their specified flow rates or capacities.*
4. *Manufacturer specifications confirming the water consumption rates of each fitting, demonstrating that all fittings comply with the requirements of the fittings approach under Part G.*

It would be great if the applicant could prepare a schedule of responses and provide updates memos / further information as requested.

GLA further comments (11/02/2026)

Apologies for the delay in providing further urban design comments. We have now reviewed the response letter and the Access and Safer Routes document. Overall, the comments raised in the Stage 1 report have been satisfactorily addressed. Details of materials and landscaping will be secured by condition, as per usual.

Fabrik's document is clear and thorough and explains how the applicant will secure safe and accessible routes into the site, including good

sightlines, overlooking from blocks and a lighting strategy. Securing a robust management and maintenance strategy for the lighting and landscaping along the length of the routes will be important. This is something the applicant will need to discuss further and agree with the LPAs.

Another point that should be discussed further with Kingston is regarding the provision of complementary uses on site. While I take the point that providing commercial floorspace on site might be challenging given the site's location, ensuring that residents have access to essential convenience retail goods should be considered. During the pre-application meeting we suggested exploring options around providing kiosks / vending machines to address this need. This is something the applicant should look into further.

6. POLICY CONTEXT

6.1 New Local Plan

The Council adopted a new Local Plan on the 20 November 2024. This replaced the Council's Sites and Policies Plan 2014 and the Core Strategy 2011. All applications validated after the 20 November 2024 will be considered against the new Local Plan. The current application was validated after the adoption of the new Local Plan and is therefore assessed against the following policies:

6.2 National Planning Policy Framework (2024)

- Chapter 2 Achieving sustainable development
- Chapter 5 Delivering a sufficient supply of homes
- Chapter 6 Building a strong, competitive economy
- Chapter 8 Promoting healthy and safe communities
- Chapter 9 Promoting sustainable transport
- Chapter 11 Making effective use of land
- Chapter 12 Achieving well-designed places
- Chapter 13 Protecting Green Belt land
- Chapter 14 Meeting the challenge of climate change, flooding and coastal change
- Chapter 15 Conserving and enhancing the natural environment
- Chapter 16 Conserving and enhancing the historic environment

6.3 London Plan (2021)

- GG1 Building strong and inclusive communities
- GG2 Making the best use of land
- GG3 Creating a healthy city
- GG4 Delivering the homes Londoners need

- GG5 Growing a good economy
- D1 London's form, character and capacity for growth
- D2 Infrastructure requirements for sustainable densities
- D3 Optimising site capacity through the design-led approach
- D4 Delivering good design
- D5 Inclusive design
- D6 Housing quality and standards
- D7 Accessible housing
- D8 Public realm
- D9 Tall Buildings
- D11 Safety, security and resilience to emergency
- D12 Fire safety
- D14 Noise
- H1 Increasing housing supply
- H4 Delivering affordable housing
- H5 Threshold approach to applications
- H6 Affordable housing tenure
- H7 Monitoring of affordable housing
- H10 Housing size mix
- H12 Supported and specialised accommodation
- S4 Play and informal recreation
- S6 Public toilets
- E4 Land for industry, logistics and services to support London's economic function
- E11 Skills and opportunities for all
- HC1 Heritage conservation and growth
- G1 Green infrastructure
- G3 Metropolitan Open Land
- G4 Open space
- G5 Urban greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands
- SI 1 Improving air quality
- SI 2 Minimising greenhouse gas emissions
- SI 3 Energy infrastructure
- SI 4 Managing heat risk
- SI 5 Water infrastructure
- SI 6 Digital connectivity infrastructure
- SI 7 Reducing waste and supporting the circular economy
- SI 12 Flood risk management
- SI 13 Sustainable drainage
- SI 14 Waterways – strategic role
- SI 17 Protecting and enhancing London's waterways
- T1 Strategic approach to transport
- T2 Healthy Streets
- T3 Transport capacity, connectivity and safeguarding
- T4 Assessing and mitigating transport impacts

- T5 Cycling
- T6 Car parking
- T6.1 Residential parking
- T7 Deliveries, servicing and construction
- T9 Funding transport infrastructure through planning
- DF1 Delivery of the Plan and Planning Obligations

6.4

Local Plan 2024

- CC2.1 Promoting Sustainable Design to Mitigate and Adapt to Climate Change
- CC2.2 Minimising Greenhouse Gas Emissions
- CC2.3 Minimising Energy Use
- CC2.4 Low Carbon Energy
- CC2.5 Minimising Waste and Promoting a Circular Economy
- CC2.6 Sustainable Design Standards
- HW10.1 Health (including mental health) and Wellbeing
- HW10.2: Delivering healthy places
- H11.1 Housing choice
- H11.2 Housing Provision
- H11.3 Housing mix
- H11.4 Supported care housing for vulnerable people or secure residential institutions for people housed as part of the criminal justice system
- D12.1 Delivering well-designed and resilient neighbourhoods
- D12.2 Urban design
- D12.3 Ensuring high quality design for all developments
- D12.5 Managing heritage assets
- D12.6 Tall Buildings
- D12.8 Digital Infrastructure
- EC13.3 Protection of scattered employment sites
- EC.13.4 Local Employment Opportunities
- IN14.1 Infrastructure
- IN14.2 Social and Community Infrastructure
- IN14.3 Sport and Recreation
- W14.4 Waste Management
- O15.1 Open Space, Green Infrastructure and Nature Conservation
- O15.2 Open Space and Green Infrastructure
- O15.3 Biodiversity and Access to Nature
- O15.4 Protection of Trees, Hedges and Other Landscape Features
- O15.5 Urban Greening
- F15.7 Flood Risk Management and Sustainable Drainage
- F15.8 Managing Local Flooding
- F15.9 Sustainable Drainage Systems (SUDS)
- P15.10 Air Quality, Pollution and Land stability
- T16.1 Sustainable Travel
- T16.2 Prioritising active travel choices
- T16.3 Managing the transport impacts of development

- T16.4 Parking and Low Emissions Vehicles
- T16.5 Supporting transport infrastructure
- M17.1 Monitoring

6.5

Other relevant policy guidance:

- National Design Guide 2021
- GLA Guidance on preparing energy assessments 2022
- London Environment Strategy 2018
- Mayor's Air Quality Strategy – 2025-2030
- Mayor's LPG - Characterisation and Growth Strategy 2023
- Mayor's LPG Optimising Site Capacity: A Design-led Approach 2023
- Mayor's LPG Housing Design Standards 2023
- Mayor's LPG - Urban Greening Factor 2023
- Mayor's LPG - Whole Life-Cycle Carbon Assessments 2022
- Mayor's LPG Air Quality Neutral 2023
- Mayor's LPG - Sustainable Transport, Walking and Cycling 2022
- Mayor's SPG - Housing 2016
- Mayor's SPG – Affordable Housing and Viability 2017
- Mayor's SPG – Play and Informal Recreation 2012
- Mayor's SPG – Accessible London 2014
- Planning for Equality and Diversity in London Supplementary Planning Guidance to the London Plan (2007)
- Mayor's SPG – Social Infrastructure 2015
- Mayor of London - Public London Charter 2021
- Mayors SPG - The Control of Dust and Emissions During Construction and Demolition 2014
- Greater London Authority guidance on preparing energy assessments as part of planning applications (June 2022)
- Electric vehicles – Accessible charging – specification (PAS 1899:2022)
- London Cycle Design Standards 2016
- Draft - Fire Safety LPG (2022)
- Draft – Affordable Housing LPG 2024
- LB Merton Character Study 2021
- LB Merton Merton's Whole Life Carbon Assessment Guidance 2024
- LB Merton – Air quality action plan - 2025-2030.
- LB Merton - Air Quality Supplementary Planning Document (SPD) 2021
- LB Merton - Draft Sustainable Drainage (SUDS) Design and Evaluation Supplementary Planning Document (SPD) 2018
- LB Merton - Waste and Recycling Storage Requirements – A Guidance for Architects
- LB Merton - Playing Pitch Strategy 2019
- LB Merton - Football Facility Plan 2019
- LB Merton - Indoor Sports Facility Study 2020

- Merton - Green Infrastructure, Biodiversity And Open Space Study 2019

7. **Planning considerations**

7.1 The principal planning considerations for the development within Merton are:

- Principle of development
- Impact on adjacent MOL
- Design and impact on the character and appearance of the area
- Impact on neighbouring amenity
- Inclusive design and healthy places
- Delivery of off-site play space
- Transport, highway network, parking and sustainable travel
- Flooding and site drainage
- Impact on the adjacent water course
- Biodiversity and Ecology
- Fire Safety
- Safety and Security considerations
- Archaeology

7.2 **Principle of development**

7.2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that when determining a planning application, regard is to be had to the development plan, and the determination shall be made in accordance with the development plan, unless material considerations indicate otherwise.

7.2.2 **Impact on adjacent MOL**

7.2.3 The London Plan confirms that MOL is afforded the same status and level of protection as Green Belt.

7.2.4 The NPPF sets out at para 154, in relation to Green Belts:

7.2.5 Development in the Green Belt is inappropriate unless one of the following exceptions applies:

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;

- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.
- h) Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it.

These are:

- i. mineral extraction;
- ii. engineering operations;
- iii. local transport infrastructure which can demonstrate a requirement for a Green Belt location;
- iv. the re-use of buildings provided that the buildings are of permanent and substantial construction;
- v. material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and
- vi. development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order

- 7.2.6 The creation of a pedestrian/cyclist access path with landscaping, lighting, seating, signage etc would effectively amount to an engineering operation which represents "Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it".
- 7.2.7 The part of the site within Merton is not within MOL but there would potentially be views of the path from MOL land.
- 7.2.8 No objection is raised in terms of the impact on the openness of the adjacent MOL, as a result of the access path, as it would be at ground level, with the proposed street furniture, lighting, signage and hard landscaping not having a significant impact on openness.

7.3 Design and impact on the character and appearance of the area

- 7.3.1 The NPPF, London Plan policies D3 and D4 and Local Plan Policy D12.3 require well designed proposals which make a positive contribution to the public realm, are of the highest quality materials and design and which are appropriate in their context. Thus, development proposals must respect the appearance, materials, scale, bulk, proportions and character of their surroundings.
- 7.3.2 As recognised in the NPPF, good design is a key aspect of sustainable development. Decisions should ensure developments will function well and add to the overall quality of the area; are visually attractive and sympathetic to local character and history (whilst not preventing or discouraging appropriate innovation or change); establish a strong sense of place, optimise the potential of the site; and create places that are safe, inclusive and promote health and wellbeing.
- 7.3.3 The London Plan policies, including GG2, D1, D3 and D5 stress the need to make the best use of land by following a design led approach that optimises the capacity of sites, in a manner that enhances local context and responds to local distinctiveness and achieves the highest standard of accessible and inclusive design. The Framework sets out significant weight should be given to development that reflects local design policies and government guidance on design, taking into account local design guidance and SPDs; and outstanding or innovative design which promotes high levels of sustainability. Conversely where development that is not well designed should be refused.
- 7.3.4 Policy D3 of the London Plan, requires development to be a high quality, and in a manner that respects, contributes to and enhances the local environment, with consideration to local character, context and distinctiveness, and responding to and being sympathetic to development patterns and layout, views, scale, height, massing, proportions, form, materials, appearance, and detailing.
- 7.3.5 The proposed path, lighting, signage, furniture, hard and soft landscaping and planting would improve the character and appearance of this part of the site and is supported.

7.4 Impact on neighbouring amenity

- 7.4.1 Policy D14 (noise) of the London Plan requires proposals to manage noise by mitigating and minimising the existing and potential adverse impacts of noise. Policy D3 Optimising site capacity through the design-led approach, sets out that development proposals should help prevent or mitigate the impacts of noise.
- 7.4.2 Policy D6 (Housing quality and standards) of the London Plan states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its

context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

7.4.3 Local Plan Policy D12.2 requires development proposals to demonstrate that impacts of proposals in terms of noise, vibrations, odour and/or pollution are minimised, and that acceptable light, privacy and outlook would be available to existing and future occupants of the proposed development and its surroundings so that a high standard of amenity is provided.

7.4.4 Local Plan Policy D12.3 seeks to ensure new developments does not unacceptably impact on the amenities of the occupiers of any adjoining and nearby surrounding properties.

7.4.5 Policy D12.4 sets out that development proposals must

- ensure that noise, vibrations or visual disturbance resulting from the development do not diminish the living conditions of existing and future residents.
- Demonstrate that the proposal does not significantly impact the quality of neighbouring buildings and amenity through overshadowing and overlooking.

7.4.6 Local Plan Policy P15.10, Air Quality, Pollution and Land Stability, requires development to provide mitigation measures where noise needs to be controlled and managed and use good acoustic design within their development.

7.4.7 The proposed path, lighting, signage, furniture, hard and soft landscaping and planting would result in a significant increase in foot traffic along this path. There would be some additional noise and activity that would be particularly noticeable from nos.68 and 111 Marina Avenue (to the immediate east of the site). However, this level of noise and activity would be no greater than a residential street (albeit with more foot traffic as opposed to vehicles). Given the proposed boundary screening, a close board timber fence, this impact is not considered to result in material harm to the occupiers of these adjacent dwellings.

7.5 Inclusive Design and Healthy Places

7.5.1 Policy D5 (Inclusive Design) of the London Plan 2021 states that development proposal should achieve the highest standards of accessible and inclusive design. Inclusive design creates spaces and places that can facilitate social integration, enabling people to lead more interconnected lives. Development proposals should help to create inclusive neighbourhoods that cumulatively form a network in which people can live and work in a safe, healthy, supportive and inclusive environment.

7.5.2 Policy GG3, creating a healthy city, of the London Plan sets out that planning must assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities, for example through the use of Health Impact Assessments.

7.5.3 The proposed path would provide a level, well-lit access with seating as resting places and the proposal is supported in terms of inclusive design and healthy places.

7.6 Delivery of off-site play space

7.6.1 Policy S4 Play and informal recreation of the London Plan sets out:

7.6.2 Development proposals for schemes that are likely to be used by children and young people should:

- 1) increase opportunities for play and informal recreation and enable children and young people to be independently mobile
- 2) for residential developments, incorporate good-quality, accessible play provision for all ages. At least 10 square metres of playspace should be provided per child that:
 - a) provides a stimulating environment
 - b) can be accessed safely from the street by children and young people independently
 - c) forms an integral part of the surrounding neighbourhood
 - d) incorporates trees and/or other forms of greenery
 - e) is overlooked to enable passive surveillance
 - f) is not segregated by tenure
- 3) incorporate accessible routes for children and young people to existing play provision, schools and youth centres, within the local area, that enable them to play and move around their local neighbourhood safely and independently
- 4) for large-scale public realm developments, incorporate incidental play space to make the space more playable.

The supporting text goes on to state:

5.4.5 Formal play provision should normally be made on-site and provide at least 10 square metres per child to address child occupancy and play space requirements generated by a development proposal. Supplementary Planning Guidance will provide additional detail on the application of this benchmark and other implementation issues. Where development is to be phased, there should be an early implementation of play space.

5.4.6 Off-site provision, including the creation of new facilities or improvements to existing provision, secured by an appropriate financial contribution, may be acceptable where it can be demonstrated that it addresses the needs of the development whilst continuing to meet the needs of existing residents. This is likely to be more appropriate for the provision of play facilities for older children, who can travel further to access it, but should still usually be within 400 metres of the development and be accessible via a safe route from children's homes. Schools, school playing fields and other facilities can also provide an important contribution to play and informal recreation facilities and should be encouraged to allow community access to facilities out of hours

- 7.6.3 The provision of play space is proposed partly on site and partly through improvements to the SJHMPF.
- 7.6.4 The Sir Joseph Hood Memorial Playing Fields are located adjacent to the Site. Whilst there is currently no direct access from the Site into the playing fields, the applicant sets out that by providing a connection, walking times to the play space would be a maximum of 4 minutes. The scheme proposes improvements to the SJHMPF.
- 7.6.5 The playspace proposed is as follows:
- 1174sqm of play is required for 0-4 year olds and this will be delivered within the Site.
 - 820sqm of play is required for 5-11 year olds, of which, 469sqm of play space for 5-8 year olds will be delivered within the Site. 351sqm of play space for 9-11 year olds will be delivered within the Sir Joseph Hood Memorial Playing Fields (off-site).
 - 407sqm of play space is required for 12 -17 year olds and this will be delivered within the Sir Joseph Hood Memorial Playing Fields.
 - Whilst no formal teenage provision is proposed within the development, the applicant notes that there are hang-out opportunities being delivered within the landscape that can be used by teenagers.
- 7.6.6 The applicant proposes to fund the creation of a new MUGA and related improved footpath access, for the following specific reasons:
- The existing basketball court is not up to MUGA standards &, anecdotal observation suggests, is not well used by residents - it has therefore been earmarked for improvements by the LBM Parks team.
 - The new MUGA is proposed to have a tarmac surface (for basketball/netball), this being more suitable than 2G (artificial grass – hockey or football), as the hard standing

is too small for a regular 5 a side football pitch or hockey pitch, with fencing suitable for basketball/netball and, potentially, a non-standard goal mouth too.

- This new surface & additional sports offer at the MUGA will make it more attractive for residents & thus should increase its use.
- A new footpath access to the MUGA from the BH site and improvement to the existing path around part of the MUGA would be provided, to improve accessibility and safety.

7.6.7 The MUGA and related footpath and landscaping improvements would cover a site area of 1,396sqm (i.e. 1045sqm MUGA, 102sqm new path, 238sqm upgrade to existing path), exceeding the 758 sqm requirement for older children's play provision.

7.6.8 In addition, the applicant proposes to fund the strategic equipment upgrade of Senior and Junior Multi Play Unit (all with less than 5 year usable life) in order to secure improved quality and upgraded informal play for teenager and younger child users over a c.250 sqm area.

7.6.9 The applicant sets out that these proposed improvements were outlined by the parks team to cost approx £400k.

7.6.10 For reference, the LBM Greenspaces team has provided a breakdown of potential future upgrades to the SJHMPF. These are:

MUGA Replacement – Approx £150k

This includes the replacement of two multi-use games areas (MUGAs) (anticipated cost of £150k), covering full resurfacing, new fencing, line marking, drainage improvements, and upgraded LED lighting where appropriate. The community-level specification would be suitable for football and basketball use (as this is already catered for on-site).

Splash Pad Installation - Approx £300k

A new splash pad, similar in scale and character to the facility at Wimbledon Park or Tamworth Rec, (anticipated cost of £300k). This would provide a high-quality and fully accessible water play zone incorporating a mix of ground jets, interactive features, filtration and plant systems, safety surfacing, and all necessary drainage and water management infrastructure.

Play Area Replacement – Approx 250k

A complete replacement of the existing play area, including new equipment, surfacing, landscaping, and seating, (anticipated cost of £250k). This estimate reflects a comprehensive renewal

providing a modern, inclusive play offer for a range of age groups, as a lot of the current equipment is nearing end of life.

A further 10% inflation increase figure is applied and further 8% for 'idverde' management fees.

MUGA – £150k
Splash Pad – £300k
Play Area - £250k

Total - £700k
10% inflation £770k
8% idverde fee £831,600

(Officers note that the off-site play provision requirement is aimed at older children, so whilst the splash pad is identified as a potential improvement, it is not directly warranted as a result of this proposed development.)

- 7.6.11 The off-site play space (total requirement of 758sqm) is sought to be met through financial contributions to facilitate improvements to the SJHMPF. Whilst planning policies direct play space requirements to be met on site in the first instance, where this is not feasible, off-site improvement works can be appropriate.
- 7.6.12 The improvements proposed have been discussed with the LBM Greenspaces team and have drawn on recommendations from the Merton Playing Pitch Strategy 2019. Additionally, the SJHMP has a detailed Management Plan 2016-2025, which the applicant has considered in terms of suggested improvement works.
- 7.6.13 The application suggests the conversion of the existing basketball court into a MUGA to serve 9-17 year old children within the scheme and better serve the 9-17 year olds amongst existing residents, along with related improved footpath access, as potential improvements to be funded by this application.
- 7.6.14 The MUGA and related footpath and landscaping improvements would cover a site area of 1,396sqm (i.e. 1045sqm MUGA, 102sqm new path, 238sqm upgrade to existing path), which would exceed the 758 sqm requirement for older children's play provision.
- 7.6.15 In addition, the applicant suggests funding the upgrade of Senior and Junior Multi Play equipment (all with less than 5 year usable life) in order to secure improved quality and upgraded informal play for teenager and younger child users over a c.250 sqm area, bringing the total area of off-site improvements to 1,646sqm.

- 7.6.16 These suggested improvements have been outlined by the Greenspaces team to cost c.400k. These works are indicative of what Merton could choose to spend the contribution on for improvements to the SJHMPF.
- 7.6.17 If the application is approved the s.106 agreement will secure this contribution, with Merton selecting which improvements at the SJHMPF are carried out.
- 7.6.18 For clarity, the applicant had submitted a master plan, carried out by Idverde, which lists a range of suggested improvements to the SJHMPF, however, these are not all proposed as part of this application. The layouts and improvements shown have been costed by the applicant and indicative of the improvement works that could be carried out.
- 7.6.19 For info, the master plan shows:

- Existing path retained and made good.
- Proposed Trees x 6
- Mounded landscape x 4
- Picnic Tables (there are 3 with numbered annotations but there appear to be 2 more shown on the plan)
- Benches 9 benches shown
- 0-4 play equipment x 3 bits of equipment
- Accessible play equipment
- Climbing net x2
- Play tower with slide x 1
- Woodland climbing trail x 2
- Natural play tree stepping stones x 2
- Natural play boulders

Existing retained and improved play equipment:

- Swings
- Bouldering wall
- Zipwire
- Net swing

- 7.6.20 Therefore, the master plan for the off-site play space is indicative of a wide range of facility improvements identified for the SJHMPF by the applicant but is not a list of facilities that would be provided under this application.
- 7.6.21 The £400K contribution can reasonably be equated to a playspace provision exceeding the 758sqm requirement for older children's play provision. Therefore, Officers conclude that the combination of on-site play provision and the proposed contribution towards off-site play

space would adequately mitigate the impact of the proposed development and would be acceptable in planning terms.

- 7.6.22 The off-site works would improve the existing playspace with Merton and this element of the proposals is supported, subject to a financial contribution to secure funding for the relevant works. This financial contribution would be secured by way of s.106 legal agreement.

7.7 Transport, highway network, parking and sustainable travel

- 7.7.1 Planning Policy T1 (Strategic approach to transport) of the London Plan 2021 states that the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

- 7.7.2 Policy T6 of the London Plan states that the Mayor will support developments, which generate high levels of trips at locations with high levels of public transport accessibility and which improves the capacity and accessibility of public transport, walking and cycling.

- 7.7.3 Policy T16.2 of the Local Plan seeks to manage and mitigate any impacts on the transport network in an efficient, safe and sustainable way.

7.7.4 Trip generation and modal split

- 7.7.5 The submitted Transport Assessment sets out that the development is anticipated to generate in the order of 177 trips in a typical weekday AM peak period, comprised of 20 arrivals and 157 departures. During the PM peak period, the development is anticipated to generate in the order of 155 trips, comprised of 104 arrivals and 51 departures.

- 7.7.6 A total of 302 trips in the AM peak period, comprised of 42 arrivals and 260 departures in addition to a total of 246 departures in the PM peak period, comprised of 160 arrivals and 85 departures. A total of 24 car driver trips in the AM peak period, comprised of 3 arrivals and 20 departures in addition to a total of 19 car trips in the PM peak period, comprised of 13 arrivals and 7 departures.

- 7.7.7 This vehicular traffic would access the site to the south and therefore is not directly relevant to the assessment within Merton.

7.7.8 Highways Impact

- 7.7.9 In terms of the operational phase of development, there would not be a materially harmful impact on highway or congestion on roads with

Merton as a result of additional vehicular traffic (as the vehicular access would be to the south only).

7.7.10 However, the following highway/transport improvements (within Merton) are required to mitigate the impact of the increased pedestrian access on to the highway, surrounding streets and train station.

- Financial contribution towards playspace improvement at SJHMPF - £400K
- Financial contribution towards investigation, consultation and potential implementation of a Controlled Parking Zone within the London Borough of Merton. (£50K)
- Financial contribution for the implementation of a pedestrian crossing over West Barnes Lane (£100K)
- Financial contribution for the implementation of pedestrian and cycle facilities, potentially to include a cycle contra-flow lane on Station Road and/or additional cycle parking at Motspur Park station and/or Prioritisation of cycle infrastructure along West Barnes Lane - £100K
- £75K towards highway repairs on West Barnes Lane.

7.7.11 Bus impact

7.7.12 Whilst concerns regarding the frequency and capacity of the K5 bus route are noted, TfL has not requested any financial contribution towards buses in the vicinity of the site. Therefore, there is no scope to secure contributions towards bus services.

7.7.13 Rail impact

7.7.14 Whilst concerns regarding the frequency and capacity of trains at Motspur park are noted, Network Rail has confirmed that it does not require contribution to increase frequency or capacity. However, a request for cycle parking improvements at the station has been made, which is included within the contribution requested by Merton Transport planners.

7.7.14 The proximity to Motspur Park Station has the potential to support a high number of sustainable journeys by train, although concerns are raised by Merton transport planners that the impact on the capacity of train services has not been adequately considered, particularly considering recent reductions in services to this station made during Covid and not yet reinstated. The overall PTAL level of the site is low with particularly poor local bus service provision which limits options for local journeys and could increase reliance on car use. This combined with the proposed low levels of car parking could lead to displacement car parking on surrounding streets and therefore funding for the potential implementation of a CPZ in Merton will be secured.

- 7.7.13 *Vehicular access to West Barnes Lane and highway effects (construction phase)*
- 7.7.14 The accompanying Healthy Streets Transport Assessment considers the proposed construction vehicle routing. It is proposed that all construction vehicles will enter from the northern access, from West Barnes Lane, avoiding the level crossing so that they always access the site via a left-turn movement from West Barnes Lane.
- 7.7.15 The Transport Assessment concludes that the low level of HGV trips associated with the delivery of the Proposed Development, it is not considered to be disruptive to local amenity. The Environmental Statement concludes that there will be a low uplift of construction traffic which is a temporary, adverse impact of minor significance.
- 7.7.16 However, Officers conclude that the additional traffic (including HGV traffic) has the potential to result in congestion, particularly at peak hours. Therefore, traffic movements must be restricted to non-peak times and the route from the A3 must avoid passing over the adjacent level crossing to the north of the site.
- 7.7.17 Therefore, there would be a temporary increase in construction traffic (including HGVs) to the north of the site. The appropriate tool to manage, mitigate and minimise this impact would be a condition to secure a Construction Logistics Plan and Construction Environmental Management Plan.
- 7.7.18 Officers note the position of the nearby Blossom House School and Green Lane School and note that a number of representations have urged the Council to restrict access times to the site for construction related vehicles. A suggestion of permitted times, from objectors is 09.30 – 14.30 (Monday to Friday, 16.00 in school holiday time).
- 7.7.19 Merton's usual hours of restriction are: No deliveries in peak hours 07.00 – 09.00 and 16.00 – 19.00 (Monday to Friday).
- 7.7.20 The applicant sets out that to limit construction traffic to only access the site between 9:30 – 2:30 would significantly impact the build programme & viability of the site (longer funding programme). In response, the applicant suggests '*not to allow HGV access between 8-9:30am in the morning & not to leave between 3-5pm in the evening*'. Due to the long access points, the applicant asserts that they will be able to manage this on site to limit the impact on the local community when the roads are most busy.
- 7.7.21 The impact on highway safety and in particular vulnerable pedestrians throughout the construction process is of paramount importance.
- 7.7.22 However, Officers note that restricting access times would prolong the construction period, which would elongate the period of disturbance to

neighbouring occupiers and the highway. In addition, a prolonged construction process would result in an adverse impact on both financial viability and housing delivery and could adversely affect affordable housing delivery.

- 7.7.23 This matter has been considered in detail by the Council's transport planning team and Highway Officer. Merton Highway Officers have considered the issues raised by objectors and the applicant and conclude that delivery hours should be restricted to not be within the following hours: 7.00-09.00 and 15.00 to 19.00 (this would include all vehicles over 3.5T not just HGVs).

The agent has contested the delivery restriction times on the basis that it would delay the construction process. However, the applicant appears to have modelled their construction programme on the basis of just one hour restricted in the am peak and one hour restricted in the pm peak. This is not a realistic approach and it is clear that a restriction of one hour in the am and pm would not be sufficient.

By way of example, recent major applications that have been approved, which do not have the same tortuous route, or nearby level crossing, that this site has, are:

24/P3406 – resolved to grant by Committee – September 2025 - no deliveries 7-9am and 4-7pm, by condition.

22/P2351 – development of the LESSA sports ground – condition discharge application 24/P0114 secured no deliveries 7-9am and 4-7pm.

The Tesco scheme, to the north of the site (19/P3287) - condition discharge application 22/P1974 secured no deliveries 7-9am and 4-7pm.

The committee report for the Mitcham gasworks, 22/P3620, includes the condition below:

26 **Deliveries**

Deliveries/servicing/maintenance and any associated activities development hereby approved shall be undertaken on-site within designated loading bays only and shall at no time be undertaken from Western Road or Portland Road or any public highway. No work or associated activities including deliveries/loading /unloading /servicing of the development hereby approved shall be carried out on the premises before 7.00am and after 10pm and between the hours of 8am-10am and 4pm-6pm on any day.

Reason: To accord to terms of the application and safeguard local road and parking conditions and residential amenity of nearby occupants in accordance with policy CS20 of Merton's Core Planning Strategy 2011 and policies DM D2, DM T2 and DM T3 of Merton's Sites and Policies Plan 2014.

However, it is noted that this restriction was not copied into the Decision Notice due to a clerical error. However, the committee report, upon which Members made their assessment, clearly includes this restriction.

Condition 9 of 25/P1578 (which varies 22/P3620) requires the submission of a Demolition and Construction Environmental Management Plan, which must detail hours of operation and loading and unloading arrangements. Therefore, the delivery times would be restricted through the discharge of this condition.

The applicant has not sought to further justify the deviation from the usual restriction times on the basis of highway safety, the argument focuses solely on the construction programme. However, it would appear that the applicant has not taken into account usual restrictions on delivery times within the London Borough of Merton and the delivery times suggested by the applicant would result in construction traffic arriving during the am and pm peaks, and would not adequately safeguard local highway safety.

7.7.24 The proposed access arrangements for large vehicles is considered to be a reasonable response to the context of the site and a left hand turn into the site would avoid conflict with the level crossing, albeit not providing such a direct route to the wider strategic road network. The concerns raised by objectors have been carefully considered and conditions to minimise the impact are recommended.

7.7.25 *Sustainable transport measures*

7.7.26 The proposed development includes a number of sustainable transport measures, as follows:

- Residents' travel packs providing details and advice on local sustainable travel modes;
- Personalised travel planning for residents;
- Provision of public transport information;
- Provision of maps and information on national, local and off-road cycling routes specifically concentrating on the local area and connections to nearby facilities / services;
- Provision of isochrone maps demonstrating the distances to the nearest local amenities and facilities'
- Promote a cycle buddy schemes amongst residents;
- Promotion of local and national sustainable travel events, such as walk to work week and cycle to work week;
- Vouchers for residents using public transport (sustainable travel vouchers for new residents);
- Bicycle Users' Group (BUG);

- Cycle maintenance clinics;
- Car sharing / Car Club. Car club spaces with RBK. One car club bay will be delivered within the red line boundary, with two additional spaces provided off-Site to the north and south of the development in the public highway.
- 20% of the total parking provision will have active Electric Vehicle Charging Points (EVCP) installed – equating to 18 bays. The remaining 80% will be equipped with passive EVCPs

7.7.27 These sustainable transport measures are noted and Officers conclude that they are necessary given the limited car parking on site combined with the low PTAL. However, the determination of the acceptability of the sustainable transport measures package will be a matter for consideration by RBK.

7.7.28 Cycle parking

7.7.29 Cycle parking would be provided – 1035 long stay spaces and 28 short stay spaces. This cycle parking is all within RBK and would be a matter for determination by RBK.

7.7.30 Car parking

7.7.31 Policy T6, car parking, of the London Plan states that Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport. Policy T6.1, Residential parking, sets out that:

- New residential development should not exceed the maximum parking standards set out in Table 10.3.
- All residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces
- Disabled persons parking should be provided for new residential developments

Location	Number of beds	Maximum parking provision*
Outer London PTAL 4	1 – 2	Up to 0.5 – 0.75 spaces per dwelling+
Outer London PTAL 4	3+	Up to 0.5 – 0.75 spaces per dwelling+
Outer London PTAL 2 – 3	1 – 2	Up to 0.75 spaces per dwelling
Outer London PTAL 2 – 3	3+	Up to 1 space per dwelling
Outer London PTAL 0 – 1	1 – 2	Up to 1.5 space per dwelling
Outer London PTAL 0 – 1	3+	Up to 1.5 spaces per dwelling^

- 7.7.32 Local Plan policy T16.4 sets out that developments in less accessible locations with a low PTAL rating should provide the minimum necessary amount of parking in accordance with London Plan standards ('car-lite').
- 7.7.33 The site has a low PTAL and the parking provision proposed is 89 parking space on site, to serve the 586 units, equating to a parking ratio of 0.15 spaces per dwelling. This is well below the London Plan maximum parking standards and the applicant seeks to justify this approach by calculating the overall level of households with cars (across Merton, Kingston and Sutton) – a ratio of 0.73. The applicant has taken the proposed car parking ratio of 0.15 spaces per dwelling, and dividing this by the ratio of 0.73 cars per dwelling in the local Boroughs – a reduction factor of 0.4 has been obtained which can be applied to the 43% car driver mode share provided in Table 6.4. As such, the proposed car driver mode share for the development is reduced to 8%, which is proportional to the level of proposed parking provision.
- 7.7.34 Officers note that TfL is supportive of this minimal level of on-site car parking. However, there would be potential for displacement parking on to roads near to the site within Merton.
- 7.7.35 The proposal includes a pedestrian/cycle access route into the adjacent Marina Avenue, which is not within a CPZ. The submitted parking survey indicates an availability of 12.5 spaces in Marina Avenue. Given that parking would only be provided for 89 of the 586 dwellings proposed, there are serious concerns that this scheme would result in displacement car parking from both residents of the proposed development and visitors.
- 7.7.36 Officers note the sustainable travel measures proposed, however, these would not provide the necessary assurance that there would not

be overspill parking to Marina Avenue. The sustainable travel measures are listed above in this report.

- 7.7.37 The MET Secured by Design Officer had expressed concern that providing a pedestrian/cycle link to Marina Avenue would generate anti-social behaviour and that this would be used by mopeds, scooters and e-bikes. In addition, LBM Officers have raised concern regarding displacement parking to this road at both pre-application and application stage.
- 7.7.38 Notwithstanding considerations of safety and security relating to this access, if the pedestrian access to Marina Avenue is retained as part of the proposals, then LBM Officers would conclude that the funding of the investigation, consultation and implementation of a CPZ in the nearby Merton is secured by way of s.106 legal agreement, in order to mitigate for this impact.
- 7.7.39 CPZ creation
- 7.7.40 The creation of a new CPZ is not proposed and is subject to a separate legislative process to a planning application. Therefore, the provision of a CPZ cannot be definitely secured through this planning application.
- 7.7.41 As set out above, given the low level of car parking proposed, it is likely that there would be displacement car parking by residents and visitors to the nearby Marina Avenue.
- 7.7.42 Policy T6 of the London Plan sets out that “An absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets.”
- 7.7.43 Therefore, the impact of this potential displacement parking should be mitigated by the investigation, consultation and potential implementation of a CPZ.
- 7.7.44 The cost of the consultation exercise of a new Controlled Parking Zone should be secured through the s.106 agreement. This is likely to have a cost of around £50,000. Note, as set out above, separate legislative process outside planning is required for the creation of a CPZ, the funds secured in the S106 would only go towards the feasibility of creating a CPZ (which would require consultation with affected neighbours) and funding for 5 years for residents should a CPZ be introduced.
- 7.7.45 If a CPZ is introduced following consultation and separation legislative process outside planning to implement those CPZ's, properties outside the CPZ (such as the application site) would not be entitled to apply for permits or park within the affected CPZ areas. It must be stressed that

the application before Members must be considered against the context of the site at the time of decision, the planning process cannot secure CPZ's on surrounding streets (as that relies on a separate process) and therefore the proposal could result in some displacement parking outside the application site (as there are currently no parking restrictions for those streets not located in existing CPZ's).

7.7.46 **Emergency access**

7.7.47 The northern access would be used as an emergency vehicle access, however, this would be occasional and would not raise concern in terms of the impact on the wider highway network. The applicant has provided a swept path analysis to show that the northern access could accommodate access for fire engines. The access would be controlled by a removeable bollard. Final details of the treatment of the access are to be secured by condition to ensure it is acceptable from a highway and fire safety point of view.

7.7.48 **Conclusion on transport, highway network, parking and sustainable travel considerations**

7.7.49 The low level of on-site car parking is noted. LBM Officers have concerns regarding overspill parking to Marina Avenue as outlined above. The limited level of parking is likely to create a pressure on both bus and rail options. The overall level of car parking will be for RBK to determine, however, given the level of car parking currently proposed, this potential adverse impact could only be mitigated through the potential implementation of a new CPZ within Merton, to be funded by the applicant and secured by s.106 legal agreement.

7.8 Safety and Security

7.8.1 Local Plan Policy D12.2 requires development to be safe and secure. Policy D12.3 sets out that all developments must provide layouts that are safe, secure and take account of crime prevention and are developed in accordance with Secured by Design principles.

7.8.2 The northern access route is a long route with minimal natural surveillance. Therefore, the provision of measures to ensure the safety and security of users, in particular the safety of safety of women, girls and gender-diverse people, is a key consideration.

7.8.3 The improvement measures identified in the ATZ, which relate to improved lighting in key locations around the site, are considered reasonable and necessary and will be secured by legal agreement.

7.8.4 Both TfL and the GLA have set out that access to the site is via two long narrow lanes with minimal natural surveillance making it challenging from a personal safety perspective, especially at night-time.

7.8.5 TfL has suggested measures to address this:

- Additional ingress/egress points from Sir Joseph Hood Memorial Playing Fields and Kingshill Avenue.
- A more decisive and open connection between Marina Avenue and the northern access, with a commitment to maintaining vegetation in this area to maximise visibility and personal safety.
- Treating street entrances to the access routes as more prominent gateways.
- Encouraging local people to walk through the site.
- Keeping proposed planting at low level (below 600mm), avoiding large shrubs that provide places to hide and shadow pedestrian areas.
- Providing consistent, dedicated street lighting (not highway lighting).
- Regular maintenance of planting, including vegetation outside the red line, to avoid overgrown planting encroaching on the pathways – which will need to be agreed with adjacent landowners.

7.8.6 Officers note that the scheme includes an access to the SJHMPF play area and a further connection to Marina Avenue. Therefore, the only route not provided is a bridged route across the watercourse.

7.8.7 The access into Marina Avenue would provide an opportunity for greater permeability and this would be supported in terms of urban design and safety considerations, for those using the main pedestrian route. The applicant has provided visualisations on how this access would appear in the submitted 'Access and safer Routes' document.

7.8.8 The access to the adjacent SJHMPF should also be a prominent visual gateway and conditions are imposed to secure further details of the treatment of this access, to ensure that it is the more decisive and open connection that TfL envisages, whilst ensuring that access by cars is restricted

7.8.9 The street entrance from West Barnes Lane will be marked by a public artwork gateway and signage and it is considered that this is a reasonable design response that would ensure that the street entrance is visually prominent.

7.8.10 There would be suitable street lighting and seating along the road which is intended to provide an attractive and inviting environment. The access route is long but there would be activity at various times of the day and night due to the high number of units proposed, which would assist in terms of natural surveillance on the route.

7.8.11 The MET Police Secured By Design Officer has commented on the scheme and makes a number of design recommendations. The SBD

Officer advises that the northern approach route paths should be at least 3m wide (which they would be).

- 7.8.12 Design enhancements to the pedestrian entrances to Marina Avenue are raised and Officers have sought additional information and plans to demonstrate the appearance of this access way.
- 7.8.13 Signage and maps are to be included and can be secured by condition.
- 7.8.14 A scheme for CCTV, suitable vehicle barriers and boundary enclosures can be secured by condition.
- 7.8.15 The design of the northern entrance sufficiently avoids opportunities for concealment and planting will be secured by condition to ensure that it is suitable.
- 7.8.16 Lighting along this route is provided and will be secured by condition.
- 7.8.17 Benches would be provided, these benches would not be located opposite one another, thereby allowing space to pass without pedestrians feeling intimidated.
- 7.8.18 A comprehensive management plan, in order to preserve a safe and welcoming environment for users and residents can be secured by condition.
- 7.8.19 Whilst the northern access road does present some challenges in terms of safety and security, the design of the route, including additional access points, lighting, benches, CCTV, management plan, suitable soft landscaping and planting, would minimise concerns relating to safety and security as far as reasonably practicable.
- 7.8.20 Officers note that concerns raised by residents of Marina Avenue, notably that the proposed access route would result in a 'leaky cul-de-sac', with increased potential for anti-social behaviour. The new access would inevitably increase footfall and potential cyclist movements along Marina Avenue, although as this route does not directly lead to any facilities in the locality, it is likely to be used less than the main route and the route to the SJHMPF.
- 7.8.21 Nonetheless, the access on to Marina Avenue would allow for additional activity along Marina Avenue and would mean that it is no longer a fully enclosed cul-de-sac.
- 7.8.22 The access on to Marina Avenue is primarily for the benefit of users of the northern pedestrian access to the development, i.e. future occupiers, however, Officers note that if other members of the public wished to access the site, either to use it as an access route or to enjoy the open space within the site, then the access onto Marina Avenue would provide some benefit. However, this benefit to the

development would result in additional footfall and activity on Marina Avenue and whilst access by car can be physically restricted, unauthorised access by motor bikes and E-scooters/bikes could not be absolutely restricted.

- 7.8.23 A number of objectors have pointed out that at least 10 dwellings on Marina Avenue are occupied by families with children attending Blossom House School, with additional requirements for a quiet residential environment.
- 7.8.24 These concerns have been carefully considered. Officers note that the proposed access to Marina Avenue would result in additional footfall and usage of the street. However, this impact could not reasonably be considered to adversely affect the residential amenities of occupiers in planning terms, to the extent that permission could reasonably be refused for this impact.
- 7.8.25 There is a balance to be struck in terms of safety measures along the access way. Lighting is essential for safety but must also be limited due to biodiversity impacts. Additional access points are generally a positive aspect in urban design terms, offering choice and permeability. However, this in turn, increases footfall and activity to Marina Avenue. Officers, overall, conclude that the package of measures put forward in the application are a reasonable design solution to dealing with this long access route.

7.9 Fire safety

- 7.9.1 London Plan Policy D12 sets out that all development proposals must achieve the highest standards of fire safety.
- 7.9.2 In the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they:
- 1) identify suitably positioned unobstructed outside space:
 - a) for fire appliances to be positioned on
 - b) appropriate for use as an evacuation assembly point
 - 2) are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures
 - 3) are constructed in an appropriate way to minimise the risk of fire spread
 - 4) provide suitable and convenient means of escape, and associated evacuation strategy for all building users

5) develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in

6) provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.

7.9.3 The northern access route forms an emergency access to the proposed development. The submission sets out that the route along the access into the main body of the Site is 4m wide to accommodate emergency vehicle access with clear sightlines and planting either side of the route being low to maintain visibility. However, as measured on plan, this path would reduce to 3.5m at points. The applicant has clarified that the “3.5m width allows for a fire tender to use this route. They typically only need more than this (3.7m) if they are actually fighting a fire in that location, which wouldn’t be the case along this route”.

7.9.5 Building regulations Part B sets out that “Any street or private drive forming part of such a fire access way must be no less than 3.7m wide between kerbs (though this may reduce to 3.1m for a gateway or similar short narrowing)”. The applicant will also be required to secure Building Regulations approval regarding fire safety matters for the development, which would include means of access for fire tenders.

7.10 Air quality and potentially contaminated land

7.10.1 The whole of Merton is an Air Quality Management Area (AQMA).

7.10.2 The proposed path, lighting, signage, furniture, hard and soft landscaping and planting would not have an adverse impact on air quality and no objection is raised.

7.11 Biodiversity, Ecology and Urban Greening

7.11.1 The London Plan sets out at Policy G6 that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain.

7.11.2 Policy G5 of the London Plan sets out that Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. The Mayor recommends a target score of 0.4 for developments that are predominately residential.

7.11.3 The site is, or is in close proximity to the following ecology related constraints:

- Site of Importance for Nature Conservation (SINC)
- Local Nature Reserve (LNR)
- Green Corridor
- Native woodland including ancient semi-natural and replanted woodland
- Water courses
- Species-rich meadow / grassland
- Heathland/acid grassland/mire/scrub

7.11.4 The London Plan sets out at para 8.6.5

“Development proposals that are adjacent to or near SINC’s or green corridors should consider the potential impact of indirect effects to the site, such as noise, shading or lighting. There may also be opportunities for new development to contribute to enhancing the nature conservation value of an adjacent SINC or green corridor by, for example, sympathetic landscaping that provides complementary habitat”.

7.11.5 The planting could be a general improvement to the Green Corridor but the increased activity and lighting along this path has the potential to adversely impact on ecology and wildlife, as lighting can have negative impacts on birds, roosting bats and bats that are feeding or commuting to feeding areas.

7.11.6 The site was assessed as having low suitability habitat for foraging and commuting bats in the submitted documents.

7.11.7 During the construction phase, the submission sets out that construction working hours would be 08:00 to 19:00 hours Monday to Friday, 08:00 to 13:00 hours on Saturday and at no time on Sundays or on public or bank holidays. Therefore, there would be no artificial lighting on the construction site between 19:00 and 08:00 to ensure there is no artificial light spill during the period when bats would be foraging/commuting.

7.11.8 In the operational phase, the submission sets out that the completed development lighting would be limited and directed away from the Beverley Brook with the use of downlighting, capped lighting and column lighting where appropriate. Light sources would feature peak wavelengths higher than 550 nm to avoid the component of light most disturbing to bats. LED luminaires would be used where possible due to their sharp cut-off, lower intensity, good colour rendition and dimming capability, as well as being compliant with the dark skies’ guidance. Luminaires would be mounted horizontally, with no light output above 90° and/or no upward tilt. The applicant concludes that when all these

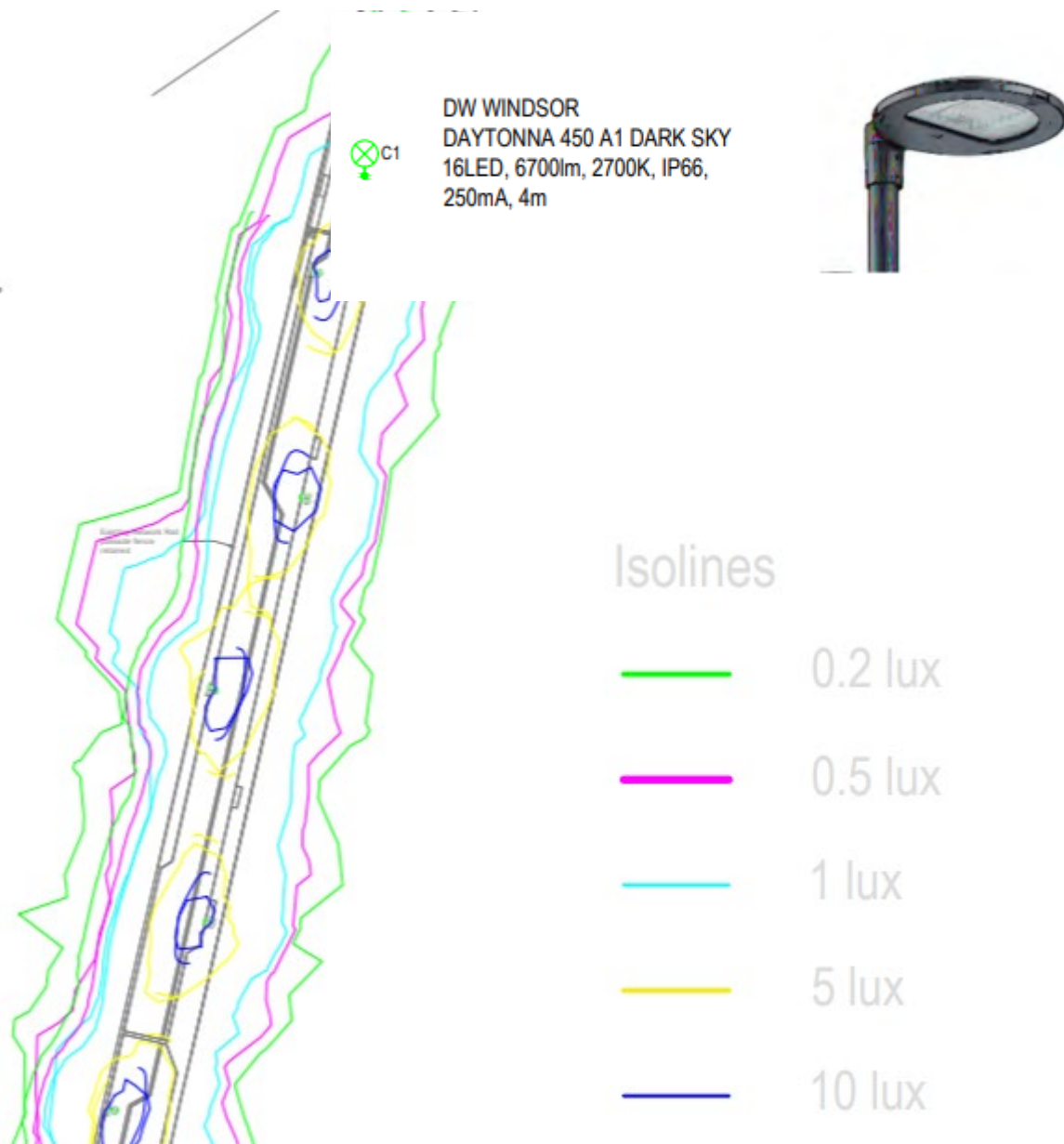
factors are considered, the lux levels along the eastern boundary adjoining the LNR are at a level of 1 lux or lower (0.5 lux in most places).

7.11.9 The lighting proposed would encompass:

- Avoid illumination of retained boundary features where possible;
- No direct illumination of any new roost entrances (such as bat boxes);
- Use of dark skies light fittings;
- Back shields and side shields added to all AMNIS LED floodlights, to reduce spill light and back light as much as practically possible; and
- LED floodlights with >550nm peak wavelengths to avoid the component of light most disturbing to bats.

7.11.10 The submission concludes that: “However, as new lighting (albeit minimal) is proposed, the impacts on this medium value receptor would result in a low impact and a Minor Adverse effect (not significant)” to foraging bats. The submission concludes that no additional mitigation is required.

7.11.11 The lighting strategy illustrates that there would be low level of light spillage along the northern access:



- 7.11.12 The submission sets out that the lighting to be installed as part of the development will be in line with Guidance Note 08/23 Bats and Artificial Lighting at Night (Bat Conservation Trust, 2023), which require that lux levels are either 1 lux or below, along important commuting features, that would be sufficient to mitigate for the impact of lighting. However, the third party ecologist appointed by Merton had raised some concern with the levels of illumination and in order to ensure a suitable balance between safety/security issues and biodiversity, a condition requiring further details of a lighting strategy, is recommended.
- 7.11.13 The proposed development does not include direct access across the water course into the SJHMPF nature reserve and whilst additional connections are generally supported in planning terms, the lack of a bridged route directly into the adjacent woodland does assist with minimising the impact.

- 7.11.14 Officers note that Natural England has responded and raise no objection on ecological grounds.
- 7.11.15 Merton Officers have sought advice on ecology matters from a suitably qualified third party consultant who has reviewed the submission, with a view to assessing against London plan, Merton and RBK policies and assessing the impact of the entire development.
- 7.11.16 The ecologist (appointed by LBM) has reviewed the submission and has raised queries on a range of detailed matters (as detailed above in the 'External consultees' section of this report) and conclude that further information is required. The ecologist concludes that a Habitats Regulations Assessment screening is required to identify whether a full Assessment would be required.
- 7.11.17 The applicant has responded to these queries and has provided a HRA screening document, which concludes that the development will not compromise the conservation objectives of Natura 2000 sites, and there will be no adverse effect on site integrity.
- 7.11.18 The third party ecologist has considered the additional information provided by the applicant and raises no further concerns subject to conditions to secure a Reptile Carrying Capacity Audit and a Reptile Mitigation Plan, to include a full translocation methodology, a Biodiversity Gain Plan and Habitat Management and Monitoring Plan. Subject to the inclusion of these conditions, the impact on ecology is considered to be acceptable and the scheme would meet BNG policy requirements.
- 7.11.19 Issues of Biodiversity Net Gain across the wider development will be a matter for consideration by RBK.
- 7.11.20 Impact on adjacent water course
- 7.11.21 No part of the adjacent Beverley Brook is within the application site on Merton land. However, the Beverley Brook runs adjacent to the eastern side of the site (the part within RBK). The western bank of the Beverley brook is partly within the application site but Officers note that there are no works to the riverbank with Merton. Therefore, the impact on the watercourse is primarily a matter for consideration and determination by RBK. Officers note that the Environment Agency has raised objection to the proposals and this objection should be resolved before the application is supported by RBK. However, Officers note that the part of the site within RBK has a potential impact on the water course, whereas the part of the site within Merton does not have this same implication.
- 7.11.22 Tree impact

The impact on trees within LBM would be minimal, with adequate replacement planting proposed. No concerns are raised on this matter, subject to suitable tree protection conditions.

7.12 **Flooding and site drainage**

7.12.1 London Plan policy SI 13 seeks to minimise the impact of flooding on residents and the environment and promote the use of sustainable drainage systems to reduce the overall amount of rainfall being discharged into the drainage system and reduce the borough's susceptibility to surface water flooding.

7.12.2 Policy F15.8 Managing Local Flooding of the Local Plan sets out that in Flood Zones 2 and 3 or on sites shown to be at high risk of surface water flooding for any other proposal where safe access/egress cannot be achieved, in accordance with the SFRA, a Flood Emergency Plan must be submitted.

7.12.3 The site is within Partially within Flood Zone 2/3 and within a Critical Drainage Area.

7.12.4 The submission sets out that following key points in relation to flooding implications along the northern access route:

- According to Ramboll's undefended model (presented in Figure 1.2), during a 1 in 100 AEP flood event, on-site flooding would be limited to the Northern access route, such that the probability of flooding in this area of the site would be equivalent to Flood Zone 3.
- During a 1 in 1,000 AEP scenario on-site flooding would occur along the Northern access route
- The full extent of the northern access route is predicted to flood in both a 1 in 100 AEP and 1 in 1,000 AEP defended scenario, such that this area would be considered as Flood Zone 3. The maximum flood depths at the northern access point were predicted to be 200mm and 60mm during the two scenarios respectively.
- Whilst the northern access route (within LBM) is likely to experience some flooding due to potential overtopping of the Beverley Brook during a 1 in 100 AEP scenario, it has been demonstrated that the Site and the southern access route would remain free from flooding during this annual probability event (for both the present day and future climate change adjusted scenarios).
- No constructions are proposed within 8m of Beverley Brook's riverbank. (However it is noted that the Environment Agency have

cited development within 8m of the riverbank, including balconies and a viewing platform).

- The development includes re-naturalising sections of the Beverley Brook, which is anticipated to benefit flood risk management. The hydraulic assessment confirms no significant increase in flood risk within or outside the site boundary.
- A comprehensive Surface Water Drainage Strategy sets out that surface water is to be discharged into the Beverley Brook at five outfall locations, with improved Brownfield betterment at the main development area and greenfield rates achieved from access areas. Proposed SuDS would include permeable paving, attenuation tanks, filter drains, brown roofs and a swale/bioretention area.

7.12.5 The Council's Flood Risk Officer initially raised some concerns and the applicant has responded to these comments as set out below:

7.12.6 LBM Flood Risk and Drainage officer comments in italic – applicant response in bold:

The preliminary drainage drawing U096-RAM05-XX-00-DR-C-655-105 Rev: P01 shows a couple items I'm not clear about. First the excerpt below indicated that's it's not yet determined if they propose a perforated pipe within the makeup of the permeable paving sub-base. Please let the applicant know that this is a compulsory requirement of permeable paving.

- **A perforated pipe will be provided within the permeable paving from north to south, with an outfall to Beverley Brook. The outfall is located at HW5, at the northern end of the main development site, and run-off is proposed to be discharged into Beverley Brook at a restricted greenfield run-off rate (1.45 l/s).**

Second, in line with the permeable paving, the applicant will need to provide details of where the perforated pipe will connect to the rest of the site's drainage system or be discharged to the river. In the case of the latter, they will need to apply to the Environment Agency for a Flood Risk Activity Permit.

- **The outfall is located at HW5, as noted in the point above, where run-off is discharged at a restricted greenfield run-off rate into Beverley Brook.**
- **We note your comment to apply for a Flood Risk Activity Permit from the EA**

The third item of note is that there seems to be a very high surface water storage volume proposed withing the permeable paving for this

access road. The approximate area of this access road is 1300m² (0.013Ha) and it appears that the storage is more than the rain falling on the roads. In the report they have combined the northern and southern access roads as one catchment (very baffling given one is in Sutton and one in Merton). We need to see the figures for the northern access to the site separately to ensure that the mitigation proposed is accurate for that section of the development, resulting in no flooding

- The hydraulic calculations were updated in a recent revision in response to planning comments. These were circulated, and if not, can be re-provided.
- The area associated with run-off from the northern access road in the hydraulic calculations is identified as 'FWay Attenuation' numbered 1 to 7. The calculations below were included with the planning response document reference U096-RAM05-XX-XX-RP-C-075-002, previously provided, and shows that there is no flooding in the 100 yr + CC event.

Stormwater Control	Storm Event	Max. US Level (m)	Max. DS Level (m)	Max. US Depth (m)	Max. DS Depth (m)	Max. Inflow (L/s)	Max. Resident Volume (m ³)	Max. Flooded Volume (m ³)	Total Lost Volume (m ³)	Max. Outflow (L/s)	Total Discharge Volume (m ³)	Percentage Available (%)	Status
Fway Attenuation 1	FEH: 100 years: +40 %: 600 mins: Winter	16.207	16.207	0.307	0.307	1.8	13.886	0.000	0.000	1.5	25.959	23.637	OK
Fway Attenuation 2	FEH: 100 years: +40 %: 600 mins: Winter	16.206	16.206	0.406	0.406	2.7	13.453	0.000	0.000	2.6	46.156	1.086	OK
Fway Attenuation 3	FEH: 100 years: +40 %: 600 mins: Winter	16.205	16.205	0.505	0.505	3.6	13.722	0.000	0.000	2.7	59.467	1.563	OK
Fway Attenuation 4	FEH: 100 years: +40 %: 600 mins: Winter	16.203	16.203	0.603	0.603	3.7	13.632	0.000	0.000	2.4	65.843	2.073	OK
Fway Attenuation 5	FEH: 100 years: +40 %: 600 mins: Winter	16.200	16.200	0.700	0.700	3.2	13.661	0.000	0.000	1.6	64.414	2.564	OK
Fway Attenuation 6	FEH: 100 years: +40 %: 600 mins: Winter	16.195	16.195	0.795	0.795	2.9	13.689	0.000	0.000	1.4	62.582	3.052	OK
Fway Attenuation 7	FEH: 100 years: +40 %: 600 mins: Winter	16.187	16.187	0.887	0.887	1.7	13.717	0.000	0.000	1.6	61.146	3.539	OK

- 7.12.7 Following this clarification, the Council's Flood Risk and Drainage Officer raises no concerns subject to a condition to secure a detailed scheme for the provision of surface water drainage.
- 7.12.7 The Environment Agency raised objection to the initial submission on the basis of building within 8m of the main river (balconies and viewing platform), the impact on biodiversity as a result of the lack of a defined naturalised buffer zone free from hardstanding which is necessary to ensure the protection of the Beverley Brook
- 7.12.8 The Environment Agency has set out that in order to overcome the objections, the applicant should revise proposals to provide an 8m unobstructed river corridor, measured from the top of the riverbank to the proposed development at its closest point (including any overhanging balconies). This offset should be demonstrated to be a naturalised buffer zone, free of hardstanding.
- 7.12.8 In addition, Officers note that the Environment Agency has raised objection and set out that the applicant must submit a flood model reflecting the proposed development which demonstrates that the

development will be safe for its lifetime from flood risk, without increasing flood risk elsewhere.

7.12.9 The applicant amended the proposal to pull back the balconies to not be within 8m of the riverbank and accordingly the EA has removed their objection which related to concerns with the proximity of the proposed development from the river. However, the objection relating to an inadequate Flood Risk Assessment is maintained. The EA has since removed their objection, in so far as the Merton element of the development. However, the outstanding concerns raised would be for RBK to consider and assess.

7.12.10 There would be some limited flooding anticipated to the northern access route. However, safe access and egress would be maintained via the southern access. Whilst the access route could flood in the future, the development does not increase the risk of flooding and is considered to be acceptable subject to conditions.

7.13 Archaeology

7.13.1 The site is within a Tier 2 Archaeological Priority Area. Due to the size of the site, over 2ha, Historic England advice is that archaeological consideration is required. Historic England GLAAS has recommended a condition to secure details, and implementation, of an appropriate programme of industrial heritage materials salvage, place-making design, community engagement and interpretation, including a delivery timetable (to be prepared in consultation with the Greater London Archaeological Advisory Service).

7.12.2 Subject to condition, the impact on archaeological considerations is considered to be acceptable.

7.13.3 The archaeological impact of the wider residential development will be a matter for determination by RBK.

7.14 GLA comments

Summary of key issues raised in GLA stage 1 report:

“Strategic issues summary

Land use principles: The residential-led redevelopment of this previously developed MOL site is strongly supported in principle. The scheme would meet the NPPF para. 154(g) exceptions test and would not cause substantial harm to the openness of the MOL albeit there would be some greater visual impacts. Benefits associated with the scheme, including affordable housing and biodiversity and ecological improvements could justify this additional impact.

Affordable housing: The proposal would deliver 175 affordable housing units (35% by habitable room) with a tenure split of 50% Affordable

Rent / 50% Shared Ownership. Subject to acceptable affordable tenures, this offer complies with Policies H4 and H5 and would be eligible to follow the fast-track viability route.

Urban design: The proposed layout, scale and massing are generally supported; however, further information and scheme refinements are required in relation to the access strategy into the site with a focus on public safety. Mitigation and ecological enhancement as identified in the Ecological Appraisal should be secured by condition to ensure impacts on SINC are appropriately mitigated.

Transport: Concerns regarding the access routes into the site should be further considered to ensure the development can be safely accessed.

Other issues on energy, whole life-cycle carbon, circular economy, sustainable urban drainage, and air quality also require resolution prior to the Mayor's decision making stage.

Recommendation: That Royal Borough of Kingston upon Thames and London Borough of Merton be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 79. Possible remedies set out in this report could address these deficiencies."

The key findings in the GLA stage 1 report are:

Land use principles:

20. Whilst it is acknowledged that the development footprint would not be larger than the existing gasholder structures on site (in terms of surface area) and therefore the proposal would not have an impact on the spatial openness of the MOL, the scale and volume of the proposed development would have a degree of additional impact on the visual openness of the MOL.
21. ...it isn't considered that the additional impact on the openness of the MOL would be substantial. The five blocks would be read as a collection of buildings and would not substantially change the existing skyline in views from the MOL directed into the site, which is already dominated by the large gasholder structures.
24. The proposal would deliver a number of benefits associated with the scheme. These include providing access to the public realm across the scheme, improvements to the Beverley Brook and the existing SINC. The proposed development would result in a total biodiversity increase of 34%, which exceeds London Plan targets. Opening up the site by introducing cycle and pedestrian connectivity would also enhance the function of the site as part

of the Green Chain / Walk London Network. Further, the proposed development would result in a total biodiversity increase of 34% and an Urban Greening Factor Score of 0.533 which exceed London Plan targets.

25. ... Considering the existing situation on site, the height, scale and massing of the proposed scheme would not substantially change the existing skyline in views from the MOL directed into the site and therefore it is considered that the additional impact on the openness of the MOL would not be substantial. The provision of public access to the site, high-quality public realm, and biodiversity and ecological improvements would result in an enhanced contribution of the site to the rest of the MOL.
26. Furthermore, the residential-led redevelopment of this PDL MOL site to deliver 586 new homes would significantly contribute to the housing targets for the borough and therefore it is supported in strategic planning terms.
27. The proposals also include the provision of 252 sqm of internal amenity space (called 'clubhouse') for residents. This represents a small quantum of floorspace, and it does not raise strategic concerns; however, further information regarding this element of the proposal should be provided and a management plan appropriately secured by RBK.
28. The lack of flexible commercial floorspace proposed across the development has been discussed at pre-application stage. The applicant should review options for providing complementary uses on site to ensure the scheme caters to the needs of future residents.

Affordable housing

30. As advised at pre-application stage, the London Plan would set a 35% affordable housing threshold for this site with respect to viability scrutiny. The proposal would deliver 35% affordable housing (by habitable room) with a tenure split: 50% Affordable Rent and 50% Shared Ownership as detailed in Table 1 below. This offer is strongly supported in strategic planning terms and would be eligible for the fast-track route.

Urban Design

Development layout and public realm

32. The proposals are well considered, having benefitted from significant input from Design Review Panel (DRP) and pre-application engagement. The proposed site layout and definition of open space are broadly supported.

33. The interface between the proposed development and the adjacent SINC is nevertheless sensitive. The applicant should engage closely with the Councils on the detailed design of this area to ensure that impacts on SINC are avoided/minimised.
34. Given the site is relatively isolated from the wider public network and is proposed to be accessed only via two entry points, further information is needed to demonstrate how routes towards the site will be designed to be safe, particularly outside of daylight hours. As highlighted in the transport section below, the accesses raise concerns from a public safety perspective, particularly in relation to night-time use. While arrival points are indicated in the application documents, further clarity should be provided with regard to the pedestrian and cycle routes into the site, ensuring these are legible and prioritised over vehicle movement. As noted at pre-application, key findings from the GLA publication on the safety of Women, Girls and Gender Diverse People in public space should be incorporated into the scheme. Further consideration should be given to this to ensure the access points into the site are as safe and inclusive as possible.
35. The proposed public realm landscape character areas are positive. The contextual approach of using elements of the former gasholders and overlaying these onto the proposed public realm is supported.
36. The consolidation of car parking along the edge of the railway line is logical, however, officers would welcome an increased softening of the car parking spaces to help better integrate these into the wider landscape of the MOL.
37. A total of 2,400 sqm of playspace is required within the development as per Policy S4. The play strategy provides 1,643 sqm play areas for ages 0-11 years on site. Play areas for ages 11-17 are proposed off-site as improvements to the existing Sir Joseph Hood Memorial Playing Fields. This should be agreed with RBK and LBM and appropriately secured.

Tall buildings, scale and massing

38. The proposal comprises five buildings (A-E) with heights between 8-16 storeys (69.42m AOD). These would constitute tall buildings according to RBK's local definition. The site is not identified in the local plan as a site suitable for tall buildings and therefore the proposals do not meet the locational requirements of Policy D9 (Part B).

40. In townscape terms, the subtle variation in height across the blocks helps to avoid the perception of a singular mass of development. The applicant is however encouraged to continue to work with RBK to ensure material tones for each block are carefully judged to achieve clear visual differentiation across the scheme in mid to longer range views.
41. The submitted TVIA indicates that the proposal, due to its scale and massing, would be highly visible in mid and long-range views; however, the existing gasholders on site have already established a presence on the skyline due to their height and visually permeable volume. The crowns of the blocks could be refined and improved for better legibility in long-range views. The applicant should consider further refining the articulation of the tops of Blocks B and D.
42. Daylight/ sunlight analysis shows the heights and massing would allow for good levels of sunlight penetration into key areas of public realm with the exception of the play area between blocks B and C. The applicant should review the playspace strategy and consider whether relocating this play area to a more suitable location is possible.
44. The Council should confirm whether the daylight and sunlight as well as the wind impacts of the development are acceptable. GLA officers will conclude on the tall buildings' environmental impacts at Stage 2.

Residential quality

45. ... Whilst there are no north or south facing single aspect units, which is welcomed, only 43.3% of the total units would be dual aspect. Where possible, the applicant should seek to improve this proportion.

Architectural quality

46. The simple and refined approach to the architecture across the scheme is supported, with the use of brick creating a strong and robust residential character. As set out above, the applicant should further consider the tops/rooflines of Blocks B and D to ensure a consistent language is achieved.

Fire safety

48. ... the fire safety statement complies with Policies D12 and D5 and all proposed measures should be secured by appropriate conditions.

Transport

Active Travel

52. Appropriate financial contributions and in-kind works should be secured to ensure the delivery of improvements to support the Healthy Street indicators and further encourage active travel, in line with Policy T2.

Access

53. The site would be accessed via two long narrow lanes with minimal natural surveillance, raising concerns from a personal safety perspective, especially at night-time. In line with the Mayor's commitments, particular consideration needs to be made of the impact on women, girls and gender-diverse people. At present, there is insufficient evidence that this has informed the design. Mitigation measures could include additional ingress/egress points from Sir Joseph Hood Memorial Playing Fields and Kingshill Avenue and a more decisive and open connection between Marina Avenue and the northern access. Further mitigation measures should be discussed with the LPAs and appropriately secured by condition.

Transport network impacts

54. Due to the predicted vehicular trip generation, highway modelling is not required for this site. Notwithstanding this, funding is sought for a signal timing review for the SCOOT region, to investigate the potential to reduce traffic on Green Lanes. There may also be scope to give additional green time to Green Lane outside of peak periods. A Travel Plan has been provided; improvements identified should be secured by the Council.

Parking

Cycle parking

55. The proposed quantum of cycle parking is 1,035 long-stay and 28 short-stay spaces; this aligns with Policy T5. Further information is required regarding the location of short-stay parking and the number of long-stay cycle parking per cycle store. Compliance with the London Cycling Design Standards (LCDS) should be secured by condition.

Deliveries, servicing and construction

58. The proposed delivery and servicing strategy is considered acceptable and would effectively accommodate the projected trip generation without adversely impacting on the surrounding

road network; this accords with Policy T7. 59. The construction logistics strategy should be agreed with LB Kingston as the highway authority in consultation with TfL. A full Construction Logistics Plan (CLP) in line with TfL guidance should be secured by condition.

Sustainable development

Energy strategy

- 60. ...The applicant is proposing the use of an individual heating system via the use of Exhaust Air Heat Pumps (EAHP) to all residential units in the development. Since the site is within a Heat Network Priority Area (HNPA), the use of this technology is considered to diverge from Policy SI3 as this type of heating system is not future proofed for district heat network connection... further justification to support the proposed approach should be provided
- 61. The applicant should therefore further refine the energy strategy and submit further information to comply with London Plan policy.
- 63. ... a carbon offset payment is required to be secured. This should be calculated and secured by RBK.

Whole Life-cycle Carbon

- 64. The applicant has submitted a whole life-cycle carbon (WLC) assessment. The WLC assessment does not yet comply with Policy SI2. Further technical information is required on the estimated WLC emissions and further opportunities to reduce WLC emissions.

Circular Economy

- 66. The applicant has submitted a Circular Economy (CE) Statement in accordance with the GLA guidance. The CE Statement does not yet comply Policy SI7. Further information is required on estimated demolition waste quantities, the reporting in the Bill of Materials as well as the Recycling and Waste Reporting tables.

Urban greening and biodiversity

- 68. The applicant has calculated that the scheme would achieve an Urban Greening Factor score of 0.53 which exceeds the target score of 0.4. The Councils should secure all greening measures to ensure the target is met.

69. The applicant has set out that there would be a biodiversity net gain of 4.08 habitat units (equivalent to a net gain of 34.32%) which complies with the London Plan. Measures to secure the biodiversity net gain should be secured by condition.

Sites of Importance for Nature Conservation

71. The application is supported by an Ecological Appraisal which considers potential impacts of the scheme on SINCS and proposes a range of mitigation and ecological enhancement. These include the maintenance and enhancement of the existing woodland to the south of the site, railway and Beverley Brook to be retained as green corridors, lighting strategy sensitive to the existing local habitats, comprehensive landscaping strategy to improve overall biodiversity on this. Mitigation and ecological enhancement measures should be further agreed with the Councils and appropriately secured by condition.

Flood risk, sustainable drainage and water efficiency

72. GLA officers have reviewed the Flood Risk Assessment (FRA) in terms of pluvial (surface water), groundwater and sewer flood risk. The site is considered to be at low (with localised areas in the southeast at medium to high) risk from these flood sources. The FRA does not adequately assess the risk of flooding from sewers. Further information should be provided by the applicant. The LPA must also engage with the relevant stakeholders concerning tidal, fluvial and reservoir flood risk to ensure that any issues relating to these flood risks are suitably resolved.
73. The sustainable urban drainage strategy does not currently comply with Policy SI13. The applicant should review measures to provide gravity discharge and should consider combination of above and below ground attenuation features. If pumping cannot be eliminated, consideration should be given to the practicality of discharging at greenfield rate, or three-time greenfield rate, where greenfield runoff rate is not possible. Rainwater harvesting proposal should be confirmed to satisfy the requirements of Policy SI.13. The applicant should also provide the completed London Borough's version of the London Sustainable Drainage Proforma.

Air quality

75. The applicant has provided an air quality assessment which concludes that the scheme would be air quality neutral and identifies that the proposed page 16 development would not require mitigation measures other than during the construction phase of the development.

On 02/12/2025, the GLA provided further feedback in relation to:

Green infrastructure:

“The applicant has provided quantitative evidence that the proposed development secures a net biodiversity gain of 4.08 habitat units (equivalent to a net gain of 34.32%) , 8.84 hedgerow unit, and 8.84 hedgerow units (equivalent to a net gain of 1242.03% in accordance with Policy G6 of the London Plan.

The trading rules have not been satisfied due to loss of 1.99 units of neutral grassland. It is noted that the applicant seeks to satisfy the trading rules through offsite habitat compensation. However, on-site biodiversity enhancements are preferable, so the applicant should seek to increase the biodiversity net gains on-site where possible, whilst following the mitigation hierarchy. This should be referred to the LPA to review in more detail.

There are a number of existing trees on site. The Addendum Arboricultural Impact Assessment states that 1 Category B tree, 4 Category C trees and 3 Category C groups of trees. Wherever possible, trees of value should be retained. There are 213 trees proposed.

The application should provide an assessment of the value of the trees to be lost using the appropriate valuation system and set out how this has been accounted for through replacement tree planting within a reasonable timescale, such as 15-20 years to allow proposed trees to establish and mature. Tree value can be derived from ‘i-tree’ or ‘CAVAT’, or another appropriate valuation system, in accordance with Policy G7 of the London Plan. Without this valuation comparison, compliance with Policy G7 cannot be determined.”

Circular Economy – queries raised on pre-development audit, pre-demolition audit, design principles, bill of materials, recycling and waste reporting, operational waste, circular economy targets, post-construction report and supporting documentation.

Whole Life Carbon – queries raised on estimated WLC emissions.

Air Quality – query submission of Air Quality Positive Statement.

Energy – query in regards to Exhaust Air Heat Pumps, be lean measures, overheating, be clean measures, be green measures and energy use intensity and space heating demand reporting.

Officer comment:

Issues raised by the GLA relevant to the Merton assessment of this application:

- The interface between the proposed development and the adjacent SINC – Merton has engaged a third party ecologist to provide a detailed review of the applicant's submission.
- Concerns regarding the access route and safety - The applicant has provided details to show a more decisive and open connection to Marina Avenue and to the SJHMPF, whilst restricting access by car.
- Drainage concerns raised by the Council's Flood Risk Assessment have now been overcome. The objection raised by the EA has also been overcome in regards to the Merton element of the development.

7.15

S.106 requirements/planning obligations

- Financial contribution towards playspace improvement at SJHMPF - £400K
- Financial contribution towards investigation, consultation and potential implementation of a Controlled Parking Zone within the London Borough of Merton. (£50K)
- Financial contribution for the implementation of a pedestrian crossing over West Barnes Lane (£100K)
- Financial contribution for the implementation of pedestrian and cycle facilities, potentially to include a cycle contra-flow lane on Station Road and/or additional cycle parking at Motspur Park station and/or Prioritisation of cycle infrastructure along West Barnes Lane - £100K
- £75K towards highways repairs on West Barnes Lane.

7.16

Conclusion

7.16.1

The proposed access path, lighting, signage, furniture, hard and soft landscaping and planting, to facilitate an access path to the wider residential development, would generally improve the character and appearance of this part of the site and is supported, subject to rigorous conditions regarding the biodiversity value of the site and surroundings.

7.16.2

Officers have concerns regarding displacement parking on Marina Avenue and as such funding towards a CPZ is required, along with other highway improvement measures as identified by TfL.

7.16.3

The off-site play space offer is supported and would be secured by s.106 legal agreement.

8

Recommendation

- 8.1 Grant permission subject to conditions, legal agreement and Stage 2 referral to the GLA.

Conditions

1	A2 Commencement of development	Commencement of development - The development hereby permitted shall be commenced before the expiration of 3 years from the date of this permission.
	1	Reason: To comply with Section 92 (as amended) of the Town & Country Planning Act 1990.
2	A7 Approved Plans	Approved Plans - The development hereby permitted shall be carried out in accordance with the following approved plans: Proposed Combined Hard & Soft Landscaping GA – Sheet 1 – U096-FAB02-XX-XX-DR-L-810-001 Rev P01 Proposed Combined Hard & Soft Landscaping GA – Sheet 2 – U096-FAB02-XX-XX-DR-L-810-002 Rev P01 Proposed Combined Hard & Soft Landscaping GA – Sheet 3 – U096-FAB02-XX-XX-DR-L-810-003 Rev P01 Proposed Combined Hard & Soft Landscaping GA – Sheet 4 – U096-FAB02-XX-XX-DR-L-810-004 Rev P01 Proposed Combined Hard & Soft Landscaping GA – Sheet 5 – U096-FAB02-XX-XX-DR-L-810-005 Rev P01 Proposed Combined Hard & Soft Landscaping GA – Sheet 6 – U096-FAB02-XX-XX-DR-L-810-006 Rev P01 Proposed Combined Hard & Soft Landscaping GA – Sheet 7 – U096-FAB02-XX-XX-DR-L-810-007 Rev P01 Proposed Combined Hard & Soft Landscaping GA – Sheet 8 – U096-FAB02-XX-XX-DR-L-810-008 Rev P01 Site Sections - U096-FAB02-XX-XX-DR-L-810-009 Rev P01 Illustrative Colour Masterplan - U096-FAB02-XX-XX-DR-L-810-010 Rev P01 Landscape Design Statement - U096-FAB02-XX-XX-DR-L-810-011 Rev P01

	SURFACE WATER LAYOUT - BELOW GROUND DRAINAGE - SHEET 6 - U096-RAM05-XX-00-DR-C-65 Rev P02. 19.02.2026 SURFACE WATER LAYOUT - BELOW GROUND DRAINAGE - SHEET 5 - U096-RAM05-XX-00-DR-C-65 Rev P03. 19.02.2026 005-001XXX-Existing Site Location Plans U096-MAC13-SW-XX-DR-A-005-001000 Existing Site Location Plan P0 26/09/2025 005-011XXX-Existing Site/Block Plans U096-MAC13-SW-XX-DR-A-005-011000 Existing Site Plan P0 26/09/2025 U096-MAC13-SW-XX-DR-A-005-101000 Proposed Site Location Plan P2 U096-MAC13-SW-XX-DR-A-005-101001 Proposed Sitewide Demolition Plan P0 26/09/2025 005-111XXX-Proposed Site/Block Plans U096-MAC13-SW-XX-DR-A-005-111000 Proposed Site / Block Plan P2 U096-MAC13-SW-XX-DR-A-005-111001 Proposed Phasing Plan P2 005-131XXX-Proposed GA Plans U096-MAC13-SW-00-DR-A-005-131000 Proposed GA Plan - Level 00 P2 U096-MAC13-SW-01-DR-A-005-131001 Proposed GA Plan - Level 01 P2 U096-MAC13-SW-02-DR-A-005-131002 Proposed GA Plan - Levels 02-03 P2 U096-MAC13-SW-04-DR-A-005-131004 Proposed GA Plan - Levels 04-05 P2 U096-MAC13-SW-06-DR-A-005-131006 Proposed GA Plan - Level 06 P2 U096-MAC13-SW-07-DR-A-005-131007 Proposed GA Plan - Level 07 P2 U096-MAC13-SW-08-DR-A-005-131008 Proposed GA Plan - Level 08 P2 U096-MAC13-SW-09-DR-A-005-131009 Proposed GA Plan - Level 09-11 P2
--	--

	U096-MAC13-SW-12-DR-A-005-131012 Proposed GA Plan - Level 12 P2
	U096-MAC13-SW-13-DR-A-005-131013 Proposed GA Plan - Level 13 P2
	U096-MAC13-SW-14-DR-A-005-131014 Proposed GA Plan - Level 14 P2
	U096-MAC13-SW-15-DR-A-005-131015 Proposed GA Plan - Level 15 P2
	U096-MAC13-SW-16-DR-A-005-131016 Proposed GA Plan - Level 16 P2
	U096-MAC13-SW-RF-DR-A-005-131017 Proposed GA Plan - Roof plan P2
	U096-MAC13-SW-XX-DR-A-190-013001 Existing Sitewide Elevation West and East P2
	U096-MAC13-SW-XX-DR-A-190-013002 Existing Sitewide Elevation North and South P0 26/09/2025
	U096-MAC13-SW-XX-DR-A-190-113001 Proposed Sitewide Elevation West and East P0 26/09/2025
	U096-MAC13-SW-XX-DR-A-190-113002 Proposed Sitewide Elevation North and South P0 26/09/2025
	U096-MAC13-AX-XX-DR-A-190-133100 Proposed GA Elevations - Building A P2
	U096-MAC13-BX-XX-DR-A-190-133200 Proposed GA Elevations - Building B P1
	U096-MAC13-CX-XX-DR-A-190-133300 Proposed GA Elevations - Building C P2
	U096-MAC13-DX-XX-DR-A-190-133400 Proposed GA Elevations - Building D P0 26/09/2025
	U096-MAC13-EX-XX-DR-A-190-133500 Proposed GA Elevations - Building E P1
	U096-MAC13-SW-XX-DR-A-191-032001 Existing GA Section 1 P0 26/09/2025
	191-132XXX-Proposed GA Sections
	U096-MAC13-SW-XX-DR-A-191-132001 Proposed GA Section 1 P1
	U096-MAC13-SW-XX-DR-A-191-132002 Proposed GA Section 2 P1

	U096-MAC13-AX-00-DR-A-195-140101 Proposed Bay Study - Building A - Base P2
	U096-MAC13-AX-00-DR-A-195-140102 Proposed Bay Study - Building A - Top P0 26/09/2025
	U096-MAC13-BX-00-DR-A-195-140201 Proposed Bay Study - Building B - Base P1
	U096-MAC13-BX-00-DR-A-195-140202 Proposed Bay Study - Building B - Top P1
	U096-MAC13-CX-00-DR-A-195-140301 Proposed Bay Study - Building C - Base P2
	U096-MAC13-CX-00-DR-A-195-140302 Proposed Bay Study - Building C - Top P2
	U096-MAC13-DX-00-DR-A-195-140401 Proposed Bay Study - Building D - Base P0 26/09/2025
	U096-MAC13-DX-00-DR-A-195-140402 Proposed Bay Study - Building D - Top P0 26/09/2025
	U096-MAC13-EX-00-DR-A-195-140501 Proposed Bay Study - Building E - Base P0 26/09/2025
	U096-MAC13-EX-00-DR-A-195-140502 Proposed Bay Study - Building E - Top P0 26/09/2025
	U096-MAC13-XX-ZZ-DR-A-705-160110 1 Bed 2 Person Type 011 P0 26/09/2025
	U096-MAC13-XX-ZZ-DR-A-705-160210 2 Bed 4 Person + Type 021 P0 26/09/2025
	U096-MAC13-XX-ZZ-DR-A-705-160211 2 Bed 4 Person + Type 021a P0 26/09/2025
	U096-MAC13-XX-ZZ-DR-A-705-160220 2 Bed 3 Person M4(3) Type 022 P0 26/09/2025
	U096-MAC13-XX-ZZ-DR-A-705-160221 2 Bed 3 Person M4(3) Type 022a P0 26/09/2025
	U096-MAC13-XX-ZZ-DR-A-705-160230 2 Bed 3 Person + Type 023 P0 26/09/2025
	U096-MAC13-XX-ZZ-DR-A-705-160231 2 Bed 3 Person + Type 023a P0 26/09/2025
	U096-MAC13-XX-ZZ-DR-A-705-161010 1 Bed 1 Person Type 101 1 P2
	U096-MAC13-XX-ZZ-DR-A-705-161110 1 Bed 2 Person M4(3) Type 111 P0 26/09/2025

		U096-MAC13-XX-ZZ-DR-A-705-161210 2 Bed 4 Person + Type 121 P0 26/09/2025 U096-MAC13-XX-ZZ-DR-A-705-161310 3 Bed 5 Person Type 131 P0 26/09/2025 U096-MAC13-XX-ZZ-DR-A-705-161320 3 Bed 6 Person Type 132 26/09/2025 U096-MAC13-XX-ZZ-DR-A-705-162210 2 Bed 3 Person + Type 221 P0 26/09/2025 U096-MAC13-XX-ZZ-DR-A-705-162220 2 Bed 4 Person + Type 222 P0 26/09/2025 U096-MAC13-XX-ZZ-DR-A-705-162230 2 Bed 4 Person + Type 223 26/09/2025 U096-MAC13-XX-ZZ-DR-A-705-163110 1 Bed 2 Person Type 311 P0 26/09/2025 U096-MAC13-XX-ZZ-DR-A-705-163210 2 Bed 3 Person Type 321 1 P0 26/09/2025 U096-MAC13-XX-ZZ-DR-A-705-163220 2 Bed 3 Person M4(3) Type 322 P0 26/09/2025 U096-MAC13-XX-ZZ-DR-A-705-163310 3 Bed 5 Person Type 331 P0 26/09/2025 U096-MAC13-XX-ZZ-DR-A-705-163320 3 Bed 5 Person Type 332 P0 26/09/2025
	1	Reason: For the avoidance of doubt and in the interests of proper planning
3	H01 New Vehicle Access - Details to be submitted	New Vehicle Access - Details to be submitted - No above ground development, other than demolition, shall commence until details of the proposed emergency northern vehicular access onto West Barnes Lane, and means of preventing access to non-emergency vehicles, to serve the development have been submitted in writing for approval to the Local Planning Authority. No works that are subject of this condition shall be carried out until those details have been approved. The details shall be implemented as approved prior to occupation of Block A.

	1	Reason: In the interests of the safety of pedestrians and vehicles and to comply with the following Development Plan policies for Merton: policies T16.3 and T16.4 of the Local Plan 2024.
4	H02 Vehicle access	Vehicle Access to be provided – Block A shall not be occupied until the proposed emergency northern vehicle accesses from West Barnes Road, and the pedestrian accesses to Marina Avenue and the adjacent Sir Joseph Hood Memorial Playing Fields have been sited and laid out in accordance with the approved plans. Reason: In the interests of the safety of pedestrians and vehicles and to comply with the following Development Plan policies for Merton: policies T16.3 and T16.4 of the Local Plan 2024.
5	H03 Redundant Crossovers	Crossovers – Block A shall not be occupied until the existing crossover with West Barnes Lane has been reinstated for emergency access and that a continuous footway has been created across the access with West Barnes Lane in accordance with the requirements of the Highway Authority.
	1	Reason: In the interests of the safety of pedestrians and vehicles and to comply with the following Development Plan policies for Merton: policies T16.3 and T16.4 of the Local Plan 2024.
6	H05 Visibility Splays	Visibility Splays - Prior to the occupation of Block A 2 metre x 2 metre pedestrian visibility splays shall be provided either side of the emergency vehicular access to the site (at West Barnes Lane). Any objects within the visibility splays shall not exceed a height of 0.6 metres.
	1	Reason: In the interests of the safety of pedestrians and vehicles and to comply with the following Development Plan policies for Merton: policies T16.3 and T16.4 of the Local Plan 2024.
7	H10 Construction Vehicles, Washdown Facilities etc (major sites)	Working Method Statement & Demolition and Construction Method Statement – Development in any phase including demolition, shall not commence until a working method statement & Demolition and Construction Method Statement for the relevant phase has been submitted to and approved in writing by the Local Planning Authority to accommodate: hours of operation

		• Parking of vehicles of site workers and visitors; • Delivery times; • Loading and unloading of plant and materials; • Storage of construction plant and materials; • the erection and maintenance of security hoarding including decorative • -displays and facilities for public viewing, where appropriate • Wheel cleaning facilities • measures to control the emission of noise and vibration during construction • Control of dust, dirt, smell and other effluvia; • Control of surface water run-off. • a scheme for recycling/disposing of waste resulting from demolition and construction works No development in the relevant phase shall be carried out except in full accordance with the approved method statement.
	1	Reason: To ensure the safety of pedestrians and vehicles and the amenities of the surrounding area and to comply with the following Development Plan policies for Merton: policies T4 and T7 of the London Plan 2021 and policies T16.3 and T16.4 of the Local Plan 2024.
8	H13 Construction Logistics Plan to be Submitted (major development)	Construction Logistics Plan - Prior to the commencement of the development of the relevant phase hereby permitted, including demolition, a Construction Logistics Plan for the relevant phase shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be adhered to throughout the construction process of the relevant phase, unless the prior written approval of the Local Planning Authority is first obtained to any variation.
	1	Reason: To ensure the safety of pedestrians and vehicles and the amenities of the surrounding area and to comply with the following Development Plan policies for Merton: policies T4 and T7 of the London Plan 2021 and policies T16.3 and T16.4 of the Local Plan 2024.

9	D12X Construction Times - major development	Construction Times - No demolition or construction work shall take place before 8am or after 6pm Mondays - Fridays inclusive, before 8am or after 1pm on Saturdays or at any time on Sundays or Bank Holidays. Reason: To safeguard the amenities of the area and the occupiers of neighbouring properties and ensure compliance with the following Development Plan policies for Merton: policies D14 and T7 of the London Plan 2021 and policies D12.1 & D12.3 of the Local Plan 2024.
10	D08 Deliveries	Deliveries - No deliveries, loading, unloading or other servicing activities, involving the use of vehicles of a weight of 3.5T or above, shall take place between the hours of 07.00 - 09.00 or 15.00 - 19.00 Monday to Friday, during school term time. On Saturdays, deliveries, loading, unloading or other servicing activities, involving any vehicles, shall only take place within the hours of 09.00 to 13.00. No deliveries, loading, unloading or other servicing activities, shall take place on Sundays. <u>Outside of term time:</u> No deliveries, loading, unloading or other servicing activities, involving the use of vehicles of a weight of 3.5T or above, shall take place between the hours of 07.00 - 09.00 or 16.00 - 19.00 Monday to Friday On Saturdays, deliveries, loading, unloading or other servicing activities, involving any vehicles, shall only take place within the hours of 09.00 to 13.00. No deliveries, loading, unloading or other servicing activities, shall take place on Sundays.
	1	Reason: To safeguard the amenities of the area and the occupiers of neighbouring properties and ensure compliance with the following Development Plan policies for Merton: policies T1 and T4 of the London Plan 2021 and policies D12.1 & D12.3 of the Local Plan 2024.
11	H04 Provision of Vehicle Parking	Provision of Vehicle Parking - The vehicle parking area shown on the approved plans, within the Royal Borough of Kingston, shall be provided before the first

		occupation of the residential units permitted under the wider development within the Royal Borough of Kingston and shall be retained for parking purposes for occupiers and users of the development and for no other purpose.
		Reason: To ensure the provision of a satisfactory level of parking and comply with the following Development Plan policies for Merton: policy T6 of the London Plan 2021 and policy T16.4 of the Local Plan 2024.
12	Sustainable transport measures	The proposed sustainable transport measures shall be implemented prior to the first occupation of any residential units in the wider development within the Royal Borough of Kingston. The measures to be implemented are: • Residents' travel packs • Personalised travel planning for residents; • Provision of public transport information; • Provision of maps and information on national, local and off-road cycling routes specifically concentrating on the local area and connections to nearby facilities / services; • Provision of isochrone maps demonstrating the distances to the nearest local amenities and facilities' • Promote a cycle buddy schemes amongst residents; • Promotion of local and national sustainable travel events, such as walk to work week and cycle to work week; • Bicycle Users' Group (BUG); • Cycle maintenance clinics; • Car sharing / Car Club. • 20% of the total parking provision will have active Electric Vehicle Charging Points (EVCP) installed – equating to 18 bays. The remaining 80% will be equipped with passive EVCPs Reason: To promote sustainable travel measures and comply with the following Development Plan policies for Merton: policies T2, T3 and T4 of the London Plan 2021 and policies T16.1, T16.2 and T16.3 of the Local Plan 2024.
13	H05 Visibility Splays	Visibility Splays - Prior to the occupation of the development 2 metre x 2 metre pedestrian visibility splays shall be provided either side of the vehicular access to

		the site. Any objects within the visibility splays shall not exceed a height of 0.6 metres.
		Reason: In the interests of the safety of pedestrians and vehicles and to comply with the following Development Plan policies for Merton: policies T16.3 and T16.4 of the Local Plan 2024.
14	Structural study of access road	Prior to the commencement of development, including demolition, a structural study of the condition of the northern access route, leading to West Barnes Lane, demonstrating that it can accommodate the weight of heavy vehicle traffic, shall be submitted to and approved in writing.
		Reason: In the interests of the safety of pedestrians and vehicles and having regard to the ecological value of the site environs and to comply with the following Development Plan policies for Merton: Policies T1, T4 and G6 of the London Plan 2021 and Policies T16.3, T16.4 and O15.3 of the Merton Local Plan 2024.
15	Management Plan	Prior to the first occupation of any residential units in the wider residential development within the Royal Borough of Kingston, a management plan to cover litter picking, maintenance of the brook, means of dealing with graffiti, criminal damage and vandalism along the northern access route shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the agreed details and measures.
	1	Reason: In the interests of the safety of pedestrians and vehicles and to comply with the following Development Plan policies for Merton: policies D12.3, O15.3, T16.3 and T16.4 of the Local Plan 2024.
16	F02 Landscaping (Implementation)	Landscaping (Implementation) - All soft landscape works along the north access route and along Beverley Brook to include planting and signage and benches, shall be carried out in accordance with the approved details as shown in the following plans, prior to the first occupation of block A: Proposed Combined Hard & Soft Landscaping GA – Sheet 1 – U096-FAB02-XX-XX-DR-L-810-001 Rev P01 Proposed Combined Hard & Soft Landscaping GA – Sheet 2 – U096-FAB02-XX-XX-DR-L-810-002 Rev P01

		Proposed Combined Hard & Soft Landscaping GA – Sheet 3 – U096-FAB02-XX-XX-DR-L-810-003 Rev P01 Proposed Combined Hard & Soft Landscaping GA – Sheet 4 – U096-FAB02-XX-XX-DR-L-810-004 Rev P01 Proposed Combined Hard & Soft Landscaping GA – Sheet 5 – U096-FAB02-XX-XX-DR-L-810-005 Rev P01 Proposed Combined Hard & Soft Landscaping GA – Sheet 6 – U096-FAB02-XX-XX-DR-L-810-006 Rev P01 Proposed Combined Hard & Soft Landscaping GA – Sheet 7 – U096-FAB02-XX-XX-DR-L-810-007 Rev P01 Proposed Combined Hard & Soft Landscaping GA – Sheet 8 – U096-FAB02-XX-XX-DR-L-810-008 Rev P01 Site Sections - U096-FAB02-XX-XX-DR-L-810-009 Rev P01 Illustrative Colour Masterplan - U096-FAB02-XX-XX-DR-L-810-010 Rev P01 Landscape Design Statement - U096-FAB02-XX-XX-DR-L-810-011 Rev P01 The works shall be carried out in the first available planting season following the completion of Block A or prior to the occupation of Block A, whichever is the sooner, and any trees which die within a period of 5 years from the completion of the development, are removed or become seriously damaged or diseased or are dying, shall be replaced in the next planting season with others of same approved specification, unless the Local Planning Authority gives written consent to any variation. All hard surfacing and means of enclosure shall be completed before block A is first occupied.
	1	Reason: To enhance the appearance of the development in the interest of the amenities of the area, to ensure the provision sustainable drainage surfaces and to comply with the following Development Plan policies for Merton: policies G7 and D8 of the London Plan 2021 and policies F15.7, F15.8, O15.1, O15.2 and O15.4 of the Local Plan 2024.

17	F13 Landscape Management Plan	Landscape Management Plan - Prior to the occupation of Block A, a landscape management plan including long term design objectives, management responsibilities and maintenance schedules for landscaped areas in the application site, within the London Borough of Merton, shall be submitted to and approved in writing by the Local Planning Authority. The landscape management plan shall be carried out in accordance with the approved scheme unless otherwise agreed in writing by the Local Planning Authority.
	1	Reason: To ensure the appearance of the development is maintained in the interest of the amenities of the area, to ensure the maintenance of sustainable drainage surfaces and to comply with the following Development Plan policies for Merton: policies SI 12 and SI 13 of the London Plan 2021 and policies O15.1, O15.2, O15.3, O15.4, O15.5, F15.7, F15.8 and F15.9 of the Local Plan 2024.
18	F05 Tree Protection	Tree Protection - No development [including demolition] pursuant to this consent shall commence until an Arboricultural Method Statement and Tree Protection Plan, drafted in accordance with the recommendations and guidance set out in BS 5837:2012 has been submitted to and approved in writing by the Local Planning Authority and the approved details have been installed. The details and measures as approved shall be retained and maintained, until the completion of all site operations.
	1	Reason: To protect and safeguard the existing retained trees in accordance with the following Development Plan policies for Merton: policy G7 of the London Plan 2021 and policies O15.1, O15.2 and O15.4 of the Local Plan 2024.
19	A Non Standard Condition	Secured By Design - The development hereby permitted shall incorporate security measures to minimize the risk of crime and to meet the specific security needs of the development in accordance with Secured by Design. Details of these measures, within the London Borough of Merton, shall be submitted to and approved in writing by the local planning authority prior to commencement of the development and shall be implemented in accordance with the approved details prior to occupation. Reason: In order to achieve the principles and objectives of Secured by Design to improve community safety and crime prevention in accordance with Policy:

		Chapters 01B & 01C Merton Local Plan, Policy D11 London Plan, Section 17 Crime and Disorder Act 1988 and National Planning Policy Framework (NPPF).
20	A Non Standard Condition	Secured By Design - Prior to occupation a Secured by Design final certificate, relating to development within the London Borough of Merton, shall be submitted to and approved by the Local Planning Authority. The submission may include a phasing plan for the relevant phase, that clearly shows the part of the site that the Secured by design certificate relates to or the borough to which it refers. Reason: In order to achieve the principles and objectives of Secured by Design to provide a safer environment for future residents and visitors to the site and reduce the fear of crime in accordance with Policy: Chapters 01B & 01C Merton New Local Plan, Policy D11 London Plan, Section 17 Crime and Disorder Act 1988 and National Planning Policy Framework (NPPF).
21	External lighting scheme	Prior to the commencement of above-ground works (other than demolition), an external lighting scheme for the northern access route, within the London Borough of Merton, shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include: • Details of the location, type, intensity, and direction of all proposed external lighting, including street lighting, and lighting of pathways. • Measures to minimise light spill, glare, and sky glow, particularly in relation to neighbouring properties and the adjacent SINC. • Times at which any lights would be switched off and on (if relevant). • A timetable for installation and operational management arrangements. The approved lighting scheme shall be implemented in full in accordance with the approved timetable and maintained thereafter in accordance with the approved details. Reason: To ensure a high-quality public realm, safeguard residential amenity, protect biodiversity, and

		minimise light pollution, in accordance with Policies D12.3 and O15.3 of the Local Plan.
22	Fire Strategy	Fire Strategy - The development shall be carried out in accordance with the provisions of the submitted Fire Statement prepared by Luke Roscoe (dated 04/09/2025) and must fully comply with The Building Regulations 2010 (as amended) unless otherwise approved in writing by the Local Planning Authority. Reason: To ensure that the development incorporates the necessary fire safety measures in accordance with the Mayor's London Plan Policy D12.
23	Air Quality	Air Quality - All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up to date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at https://nrmm.London/
		Reason: To comply with Policy SI1 of the London Plan 2021 and Policy P15.10 of the Local Plan 2024.
24	B4 Details of surface treatment	Surface Treatment - No development, other than demolition, shall take place until details of the surfacing of all those parts of the site not covered by buildings or soft landscaping, including any parking, service areas or roads, footpaths, hard and soft have been submitted in writing for approval by the Local Planning Authority. No works that are the subject of this condition shall be carried out until the details are approved, and the development shall not be occupied / the use of the development hereby approved shall not commence until the details have been approved

		and works to which this condition relates have been carried out in accordance with the approved details.
	1	Reason: To ensure a satisfactory standard of development in accordance with the following Development Plan policies for Merton: policy D4 of the London Plan 2021 and policies D12.1 and D12.3 of the Local Plan 2024.
25	B5 Details of Walls/Fences	Boundary Treatment - No above ground development (other than demolition), shall take place until details of: - all boundary fences to the northern access route, - detailed plan showing vehicle barriers on the northern access route - detailed treatment of Marina Avenue access - pedestrian access details to Sir Joseph Hood Memorial Playing Fields and - pedestrian access details to West Barnes Lane are submitted in writing for approval to the Local Planning Authority. The agreed fencing, vehicle barriers, works to Marina Avenue access, pedestrian accesses onto the Sir Joseph Hood Memorial Playing Fields and West Barnes Lane, shall be implemented prior to the occupation of Block A and thereafter the works shall be permanently retained.
	1	Reason: To ensure a satisfactory and safe development in accordance with the following Development Plan policies for Merton: policies D4 and D8 of the London Plan 2021 and policies D12.1 and D12.3 of the Local Plan 2024.
26		Prior to the commencement of the development a detailed scheme for the provision of surface water drainage shall be submitted to and approved in writing by the local planning authority. The drainage scheme will dispose of surface water by means of a sustainable drainage system (SuDS). In this instance, it will include permeable paving with sub storage required to contain the 100yr plus 40% climate change event as outline in drawing U096-RAM05-XX-00-DR-C-65 Rev P02. The surface water shall discharge to the Beverly Brook.

		Reason: To reduce the risk of surface and foul water flooding to the proposed development and future users, and ensure surface water and foul flood risk does not increase offsite in accordance with Merton's policies F15.7, F15.8 and F15.9 and the London Plan policy SI 13.
27	A Non Standard Condition	No development shall commence until a Reptile Carrying Capacity Audit and a Reptile Mitigation Plan, to include a full translocation methodology, has been submitted to and agreed in writing by the Local Planning Authority. The relevant works shall be carried out in accordance with the agreed measures. Reason: to protect and enhance the biodiversity of the site, in the interest of nature conservation and to comply with the following development plan policies for Merton: policies G5 and G6 of the London Plan 2021 and policy O15.3 of the Local plan 2024.
28		No development shall commence until a Biodiversity Gain Plan (BGP) has been submitted to and approved in writing by the Local Planning Authority. The BGP shall include a Habitat Management and Monitoring Plan (HMMP) detailing the creation, enhancement, and long-term management of biodiversity features to achieve a minimum 10% net gain in biodiversity value. The approved HMMP shall be implemented in full and maintained for a minimum period of 30 years from the date of completion of the development. The HMMP shall include: • Details of the habitats to be created or enhanced. • Management prescriptions and responsibilities. • Monitoring schedule and reporting mechanisms. • Adaptive management measures to ensure delivery of biodiversity outcomes. • Arrangements for legal and financial security to ensure delivery over the 30-year period.
		Reason: To ensure the development delivers measurable and lasting biodiversity net gain in accordance with Policy G6 of the London Plan 2021 and Policy O15.3 of the Merton Local Plan 2024.

29	Biodiversity/Ecology	The mitigation and enhancements recommended in the submitted Ecological Impact Assessment within the northern access (Merton part of the development) shall be carried out prior to the occupation of Block A and maintained thereafter. Reason: to protect and enhance the biodiversity of the site, in the interest of nature conservation and to comply with the following development plan policies for Merton: policies G5 and G6 of the London Plan 2021 and policy O15.3 of the Local plan 2024.
30		A scheme to provide details of fencing, safety signage and lifesaving aids for the Beverley Brook, within the London Borough of Merton and the Royal Borough of Kingston, alongside a timetable for installation shall be submitted to and approved in writing by the Local Planning Authority. The agreed measures shall be implemented in accordance with the approved timetable and retained and maintained thereafter. Reason: Having regard to visual amenity and safety considerations, in accordance with Policies D4, D8 and D11 of the London Plan and Policies D12.1 and D12.3 of the Local Plan.
31	Archaeology	No development shall commence until details of an appropriate programme of industrial heritage materials salvage, place-making design, community engagement and interpretation for any heritage features within the London Borough of Merton, including a delivery timetable has been prepared in consultation with the Greater London Archaeological Advisory Service and submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved programme. Reason: In order to provide the opportunity to record the history of the site and to comply with the following Development Plan policies for Merton: policy HC1 of the London Plan 2021 and policy D12.5 of the Local Plan 2024.
32		Noise levels, (expressed as the equivalent continuous sound level) LAeq (15 minutes), from the mechanical

		plant shall not exceed LA90-5dB at the boundary with the closest residential property.
		Reason: To safeguard the amenities of the occupiers of adjoining properties and to comply with the following Development Plan policies for Merton: policy D14 of the London Plan 2021 and policy D12.1 of the Local Plan 2024.
33		Details of the CCTV strategy and ANPR camera arrangements for the northern access route shall be submitted to and approved in writing by the Local Planning Authority prior to installation. The agreed measures shall be implemented and in use prior to the first occupation of Block A.
		Reason: Having regard to security considerations and to accord with policies D5, D8 and D11 of the London Plan 2021 and Policy D12.1 of the Merton Local Plan 2024.
34		Phasing Plan - The development hereby approved shall be constructed in accordance with the submitted Phasing Plan (ref. U096-MAC13-SW-XX-DR-A-005-111001 Rev P0). This is a phased development for the purposes of the CIL Regulations (2010 as amended). The approved phasing plan shall be complied with at all times.
		Reason: To ensure the delivery of the scheme hereby approved and in order that this planning permission qualifies as a phased planning permission for the purposes of the Community Infrastructure Levy Regulations 2010 (as amended).
Inf 01		INFORMATIVE For clarity, "site preparation works", referred to in the above Condition 23, includes: Site clearance/preparation, site investigation, remediation and archaeological investigations only.
Inf 02		INFORMATIVE In relation to Condition 7, Working Method Statement: The applicant may submit, for approval, Working Method Statements in respect of any number of phases.

Inf 03	INF 09 Works on the Public Highway	INFORMATIVE You are advised to contact the Council's Highways team on 020 8545 3700 before undertaking any works within the Public Highway to obtain the necessary approvals and/or licences. Please be advised that there is a further charge for this work. If your application falls within a Controlled Parking Zone this has further costs involved and can delay the application by 6 to 12 months.
Inf 04	INF 08 Construction of Accesses	INFORMATIVE It is Council policy for the Council's contractor to construct new vehicular accesses. The applicant should contact the Council's Highways Team on 020 8545 3829 prior to any work starting to arrange for this work to be done. If the applicant wishes to undertake this work the Council will require a deposit and the applicant will need to cover all the Council's costs (including supervision of the works). If the works are of a significant nature, a Section 278 Agreement (Highways Act 1980) will be required and the works must be carried out to the Council's specification.
Inf 05	INF 12 Works affecting the public highway	INFORMATIVE Any works/events carried out either by, or at the behest of, the developer, whether they are located on, or affecting a prospectively maintainable highway, as defined under Section 87 of the New Roads and Street Works Act 1991, or on or affecting the public highway, shall be co-ordinated under the requirements of the New Roads and Street Works Act 1991 and the Traffic management Act 2004 and licensed accordingly in order to secure the expeditious movement of traffic by minimising disruption to users of the highway network in Merton. Any such works or events commissioned by the developer and particularly those involving the connection of any utility to the site, shall be co-ordinated by them in liaison with the London Borough of Merton, Network Coordinator, (telephone 020 8545 3976). This must take place at least one month in advance of the works and particularly to ensure that statutory undertaker connections/supplies to the site are co-ordinated to take place wherever possible at the same time.

Inf 06	INF 11 Drainage	INFORMATIVE It is the responsibility of the developer to make proper provision for drainage to ground, watercourses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off-site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of ground water. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required (contact no. 0845 850 2777).
Inf 07	Note To Applicant - Approved Schemes	INFORMATIVE Note to Applicant -Approved Schemes In accordance with paragraph 38 of the National Planning Policy Framework, London Borough of Merton (LBM) takes a positive and proactive approach to the delivery of sustainable development, by: 1. Providing a formal pre-application advice service, details to be found on Planning pre-application advice service on LBM's website 2. Providing written policies and guidance, which is available to view on LBM's website. 3. Where appropriate, negotiating amendments to secure a positive decision. 4. Determining applications in a timely manner including providing a fast track service, details to be found on Get a quicker planning decision on LBM's website. In this instance: i) The application was amended following negotiations with the Council to ensure the scheme complied with adopted policy and guidance

		ii) The application was recommended for approval and would have been referred to the first available Planning Committee.
Inf 08	Section 106 Agreement	INFORMATIVE - Section 106 Agreement This planning permission has a Section 106 Agreement which must be read in conjunction with it.
Inf 09	INF 00 Non-Standard/ Blank Informative	INFORMATIVE - Thames Water If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/building-water.
Inf 10	Good site practice.	INFORMATIVE - Good site practice. The Council as local planning authority, recognizes the importance of achieving high standards of site practice and workmanship in the course of construction and acknowledges that this will have significant influence upon the quality of the finished brickwork. The applicant is therefore encouraged to follow the advice set out in the Brick Development Association publication: Good-Site-Practice-Workmanship-General-Guide-2023 when implementing the wider development.
Inf 11	Swifts	INFORMATIVE The applicant should be aware that the wider development site may provide a useful habitat for swifts. Swifts are currently in decline in the UK and in order to encourage and improve the conservation of swifts the applicant is advised to consider the installation of swift nesting box/bricks on site.
Inf 12	Building regulations	INFORMATIVE Building Regulations

		Please note that this is a planning permission only and you may also require approval under the Building Regulations. If you are in any doubt about this you can get further information via https://www.merton.gov.uk/planning-and-buildings/building-control or by emailing building.control@merton.gov.uk.
Inf 13	INF 00 Non-Standard/Blank Informative	INFORMATIVE - Thames Water There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.
Inf 14	INF 14 Tree felling, Birds and Bats	INFORMATIVE Demolition of buildings should avoid the bird nesting and bat roosting season. This avoids disturbing birds and bats during a critical period and will assist in preventing possible contravention of the Wildlife and Countryside Act 1981, which seeks to protect nesting birds/bats and their nests/roosts. Buildings should also be inspected for bird nests and bat roosts prior to demolition. All species of bat in Britain and their roosts are afforded special protection under the Wildlife and Countryside act 1981. If bats are found, Natural England should be contacted for advice (tel: 020 7831 6922).
Inf 15		INFORMATIVE The CCTV strategy should be designed and installed by a contractor and a certificate confirming that the CCTV installation is compliant with BS 7958:2015 CCTV management and operation and meets the requirements of GDPR. The contractor will also be required to issue an NSI or SSAIB certificate of compliance.
Inf 16		INFORMATIVE Flood Risk Activity Permit

Inf 17		The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place: • on or within 8 metres of a main river (16 metres if tidal) • on or within 8 metres of a flood defence structure or culvert (16 metres if tidal) • on or within 16 metres of a sea defence • involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert • in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission. For further guidance please visit https://www.gov.uk/guidance/flood-risk-activities-environmental-permits or contact our National Customer Contact Centre on 03702 422 549 or by emailing enquiries@environment-agency.gov.uk. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity. INFORMATIVE Planning Informative (Section 106 Agreement) - This planning permission has a Section 106 Agreement which must be read in conjunction with it.
-------------------	--	---