

MOUNT CLARE CAMPUS, MINSTEAD GARDENS, ROEHAMPTON GATE, SW15 4EE

PROOF OF EVIDENCE

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LPA REF: 2025/0074

APPEAL REF: APP/H5960/W/25/3371729

Application for 'Use as Hostel Accommodation (Sui Generis) with associated landscaping and cycle parking'

Appeal by AKA Capability LLP

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1.0 PERSONAL DETAILS

- 1.1 My name is Mandip Singh Sahota, I am a Partner at NTA Planning LLP, a firm of planning consultants based in London and Harrogate.
- 1.2 I hold an honours degree in Urban Studies (BA), and a Postgraduate Diploma in Town and Regional Planning (DipTP), both from the University of Sheffield. I am a Member of the Royal Town Planning Institute (MRTPI).
- 1.3 I have over twenty years of professional experience working in planning practice across England with extensive expertise in residential, mixed-use and specialist accommodation schemes, including hostel and Temporary Accommodation (TA) projects.
- 1.4 My work involves preparing planning applications, negotiating with local authorities, managing appeals, and giving evidence at hearings and Inquiries. I have acted for developers, institutions and local authorities.

Declaration

- 1.5 I understand my duty to this Inquiry and have complied with and will continue to comply with that duty. The evidence that I have prepared for this appeal and the opinions expressed in this Proof of Evidence are my true and professional opinions, and in accordance with the RTPI Code of Professional Conduct.

2.0 INTRODUCTION

- 2.1 This Proof of Evidence relates to the appeal made by AKA Capability LLP (the **Appellant**) against the London Borough of Wandsworth's (the **LPA**) failure to determine planning application ref. 2025/0074, within the statutory period. The application relates to Mount Clare Campus, Minstead Gardens, in Roehampton (the Appeal **Site**). The application sought planning permission for '*Use as Hostel Accommodation (Sui Generis) with associated landscaping and cycle parking*'.
- 2.2 The Council's Statement of Case (SoC) confirms that, had the application been determined, the Council would have refused planning permission for 7 reasons, including; not meeting the requirements of Local Plan Site Allocation RO2; not meeting identified need/overconcentration of HMO/single person accommodation; adequate standards of accommodation; sustainability measures; affordable housing requirements; impact on heritage assets; and, absence of a completed planning obligation.
- 2.3 The reason relating to sustainability matters is no longer a putative reason for refusal, following the Council's withdrawal of this reason in correspondence dated 16th December 2025.
- 2.4 My evidence responds to the issues raised in the Council's SoC, the delegated Officer Report (Appendix 1 of the LPA's SoC), and subsequent submissions made by the Council, with a focus on planning matters.
- 2.5 My evidence addresses the planning merits of the proposed development. It does not seek to revisit the lawful use issue considered in the 2025, s192 appeal (PINS Ref: 3358768). However, as there continues to be disagreement between the parties on this matter, and in accordance with the Inspector's guidance, my evidence adopts a clear baseline position on use for the purposes of assessing planning impacts, informed by the Site's established planning history and the previous s.192 appeal decision. It also considers the Council's contrary position, which is still presently unclear but seems to be an allegation of 'nil use' or at least a suggestion that the Appellant has not established that there is any lawful use of the site.
- 2.6 Separate Proofs of Evidence have been prepared on behalf of the Appellant by specialists covering transport, heritage, design (including space standards), use, and Temporary

Accommodation/housing. I do not duplicate their evidence, but I do rely on their professional views and conclusions where they materially relate to planning matters.

2.7 My evidence focuses on the planning issues arising from the development which principally include the following:

- 2.7.1 The principle of Temporary Accommodation at the appeal Site, including loss of former use, Site Allocation RO2, and need.
- 2.7.2 The adequacy and quality of the accommodation proposed
- 2.7.3 Affordable Housing and Heads of Terms
- 2.7.4 Planning Balance and Public Benefits

3.0 APPEAL SITE AND SURROUNDING AREA

- 3.1 The appeal Site comprises Mount Clare Campus, Minstead Gardens, Roehampton Gate, situated at the south-western edge of the Alton West Estate. The Site lies adjacent to Richmond Park and forms part of the wider verdant landscaped setting and heritage assets.
- 3.2 The Site lies within the Alton Conservation Area and includes two highly graded listed building, including the Grade I listed Mount Clare House, and the Grade II* Temple. Much of the Site also falls within the Grade II Registered Park and Garden, designated in 2020.
- 3.3 The Site accommodates a range of buildings of differing ages, condition and architectural significance. In summary:
- 3.3.1 Mount Clare House, a Palladian, late 18th century Grade I listed building, however no works or use is proposed to it as part of the proposed development. It has most recently been used for offices and administrative functions by the previous occupants, the University of Roehampton.
 - 3.3.2 Temple, a Grade II* listed structure originally positioned within the grounds of Parkstead House but relocated to Mount Clare in 1913. The building is constructed in stone and is Greek Doric in style.
 - 3.3.3 Picasso House, a two-storey 1960's block, with basement level. The building originally lawfully accommodated dining and ancillary facilities at ground level with staff living accommodation at first floor. The basement accommodates plant, stores and ancillary workshop. The ground floor has more recently also been used in small part by the Citizens Advice Bureau, as well as ad-hoc storage by the University of Roehampton.
 - 3.3.4 Fifteen Student Accommodation Blocks (Blocks A-E), comprising two storey 1960's buildings arranged in five clusters of three, provide 180 rooms in their original configuration. These buildings were last lawfully used as student accommodation by the University of Roehampton.

3.3.5 The Lodge is a small building located close to the Temple and is currently in a poor state of repair following a period of vacancy. Its condition and the scope of works required to facilitate its reuse have been the subject of correspondence between the parties. A Structural Assessment Report (SAR) submitted by the Appellant demonstrated that the structure is capable of retention and repair, allowing its reuse. The implications of this have been addressed by the Inspector (PINS correspondence dated 11th November 2025), and my evidence does not seek to go beyond that clear position.

3.3.6 Outbuildings, a garage and a separate open sided outbuilding/garage are located adjacent the Lodge, both formerly accommodating parking provision and are in reasonable condition.

3.4 The campus is accessed from Minstead Gardens, via a vehicular entrance leading to a forecourt in front of Mount Clare House. The Site has a Public Transport Accessibility Level (PTAL) of 1b/2.

4.0 THE PROPOSED DEVELOPMENT

- 4.1 The appeal proposals seek planning permission for the use of the existing buildings at Mount Clare Campus for hostel (Temporary Accommodation) use, with the exception of Mount Clare House and the Temple, together with associated landscape works, cycle parking, refuse storage, and internal refurbishment works necessary to facilitate the proposed use.
- 4.2 The fifteen two-storey blocks (Blocks A-E) will be refurbished internally to deliver modern temporary accommodation. Works comprise the introduction of en-suite shower rooms and kitchenettes and internal layout changes to improve the living environment, and to ensure compliance with relevant standards (*'Setting the Standards'*). There are no external alterations to these buildings, and their massing, elevations and access arrangements would be unchanged. The internal works proposed are designed to improve useability and quality of accommodation.
- 4.3 Picasso House will be refurbished to provide additional living accommodation at ground and first floor levels, along with communal kitchen facilities, shared amenity space, cycle storage and concierge/management office. Changes to the basement layout accommodate plant, refuse and recycling storage, and further cycle storage. No external alterations are proposed, and the building will retain its existing form and appearance.
- 4.4 The Lodge is currently vacant and in a state of disrepair. The Appellant has submitted a SAR which concludes that there is no reason why the existing structure cannot be retained and repaired and reused for additional TA accommodation. The Inspector, under this appeal, has confirmed that the SAR is the only structural survey before him and that it has not been demonstrated that the description of development is inaccurate. On that basis, the proposal relates to the use of the building as part of the hostel accommodation. Any future requirements for building operations beyond those envisaged (repair) would be a separate matter, and if necessary, subject to further application and assessment.
- 4.5 The proposal also includes new and upgraded cycle parking, refuse stores, together with soft landscaping, children's play space, and general improvements to external areas. These interventions are modest and designed to support the proposed use while preserving the character of the Site.
- 4.6 The Appellant's approach is grounded in a fabric first strategy that prioritises reusing the existing buildings, minimising embodied carbon and avoiding substantial emissions and upheaval associated with comprehensive demolition and reconstruction. The proposals seek to reuse existing buildings, upgrading thermal performance. Since the appeal was first lodged, energy and sustainability matters have been resolved and withdrawn as a putative reason for refusal, however the fabric first approach remains materially relevant to the proposed development and is discussed later in my evidence.
- 4.7 The accommodation, providing a total of 265 bedrooms, will be managed on-Site, with staff presence located in Picasso House. The Appellant has not suggested they would be offering

supported housing to those with complex needs and support requirements, and it is confirmed that this is not their intention.

- 4.8 A draft outline Management Plan is appended (**Appendix 1**), to be secured by condition, and will ensure effective oversight of the Site, including arrangements for security, waste collection, visitor controls and safeguarding for residents.
- 4.9 The listed buildings will be retained and maintained by the Appellant (to be secured by condition) until a longer-term solution and appropriate use can be achieved.

5.0 PLANNING POLICY FRAMEWORK

5.1 This section outlines the relevant planning policy framework which forms the basis for my evidence, and the main issues identified by the Inspector.

5.2 The National Planning Policy Framework (NPPF) (2024) is of material importance. Key provisions include:

5.2.1 Delivery of a sufficient supply of homes (Chapter 5) and emphasises the need to significantly boost housing supply and respond to local housing needs. It recognises a wide variety of housing types, including specialist accommodation.

5.2.2 Design (Chapter 11). High quality design is required for all development. For Temporary Accommodation, this is interpreted proportionately.

5.2.3 Conserving and enhancing the historic environment (Chapter 16), sets out the duties in relation to listed buildings, their settings, Conservation Area and heritage assets and the balancing exercise for 'less than substantial harm'.

5.2.4 Decision-making (Chapter 4), states that decisions should promote sustainable development.

5.3 The Development Plan comprises:

5.3.1 The London Plan (2021)

5.3.2 The Wandsworth Local Plan (2023)

5.4 The main London Plan policies relevant to the appeal proposals are:

5.4.1 Policy H12, 'Supported and Specialised Accommodation', which recognises specialist forms of accommodation for vulnerable households, homeless persons, and people in acute housing need. It supports such accommodation where there is demonstrable need, where appropriate management is secured, and where design and accessibility requirements are met.

5.4.2 Policy D3, 'Optimising Site Capacity through a Design-Led Approach', requires development to make the best use of land, having regard to context, constraints and design limitations, including heritage. It does not require intensification but does expect capacity to have been appropriately considered.

5.4.3 Policy HC1, 'Heritage conservation and growth', requires an assessment of significance, impact on setting and heritage-led design responses.

- 5.4.4 Transport Policies (T1-T7) require safe, accessible and well-managed transport arrangements, proactive promotion of cycles, and consideration of PTAL levels.
 - 5.4.5 Policy SI2, 'Minimising Greenhouse Gas Emissions' requires carbon reduction and energy efficiency measures to be considered in development. Whilst energy is no longer a putative reason for refusal, this policy remains relevant in regard to the Appellant's overarching approach to the development of the Site.
- 5.5 The Local Plan also contains various policies which are either relevant to the main issues, or, in my view not relevant but have been referred to within the LPA's delegated report and SoC. In summary those are;
- 5.5.1 Policy LP3, 'Historic Environment' requires development to protect, sustain and enhance heritage assets, their setting and local character while achieving high-quality design.
 - 5.5.2 Policy LP10, 'Responding to the Climate Crisis' requires development to respond to climate change through sustainable design, energy efficiency, low carbon measures and environmental performance.
 - 5.5.3 LP23, 'Affordable Housing', requires maximising affordable housing delivery in new developments, targeting a strategic aim of 50% of new homes as affordable, prioritising social rented housing and good tenure mix.
 - 5.5.4 LP24, 'Housing Mix', seeks a mix of dwelling sizes in new housing to meet local needs, with emphasis on smaller homes.
 - 5.5.5 LP27, 'Housing Standards', seeks all new dwellings to meeting housing quality and space standards, ensuring acceptable living conditions.
 - 5.5.6 Policy LP29, 'Housing with Shared Facilities', sets out requirements for house within shared facilities (e.g. co-living), which includes contributions towards conventional affordable housing.
 - 5.5.7 Policy LP31, 'Specialist Housing for Vulnerable and Older People' supports the development of specialise and supported housing for vulnerable and older persons that meets identified need. The policy primarily applies to C2 and C3 uses and lists a number of examples of specialist and supported housing, none of which directly relate to TA. However, it acknowledges, in supporting para 17.57, that it also notes London Plan policies, including H12. LP31 is therefore given some weight as far as it relates to TA (H12).

- 5.5.8 Policy LP62, 'Planning Obligations', notes that planning obligation will be sought on a site-by-site basis, to secure aspects such as affordable or infrastructure.
- 5.5.9 Site Allocation RO2, 'Mount Clare, Minstead Gardens, Roehampton, SW15' is a site-specific allocation. The Site allocation red line corresponds with the appeal Site boundary. The Site allocation is for '*Mixed-use development with residential uses*'.
- 5.5.10 The emerging Wandsworth Local Plan revisions carry limited to moderate weight at the time of writing, in accordance with the NPPF. Relevant emerging policies broadly align and reinforce the existing policy framework, including in regard to an emphasis on design-led optimisation, heritage considerations, support for specialist forms of accommodation, and sustainability requirements.
- 5.5.11 None of the emerging policies are considered to conflict with the appeal proposals when having regard to the adopted Local Plan.

6.0 MAIN ISSUES

a. Baseline Use Position

The Appellant's Position

- 6.1 In accordance with the Inspector's guidance, my evidence adopts a clear and realistic baseline position for the purposes of assessing planning impacts.
- 6.2 The Appellant's baseline position is informed by the previous s192 appeal decision, together with the written confirmation provided by the University of Roehampton dated 21st August 2025, which sets out the characteristics of the Site's historic and established use (**Appendix 2**). This position is further corroborated by the evidence, prepared and submitted by Christopher Aquilina MRICS of Spring4 Limited, dated December 2025, based on his personal observations, knowledge of the Site since c.2001 and involvement with the Site over a period of 14 years.
- 6.3 For the purposes of this appeal, the baseline is therefore taken as the established residential and institutional use of the Site, comprising long standing student accommodation and staff accommodation with associated ancillary and administrative functions. This, in my view, represents an appropriate starting point against which the effects of the proposed development should be assessed.
- 6.4 I do not consider it proportionate for the baseline position to be examined as a separate topic, however should the LPA continue to assert that the Site should be assessed on the basis of a 'nil use' or argue that the Appellant has not established that there is any lawful use, the Appellant reserves the right to call factual evidence at the Inquiry, through Mr Christopher Aquilina MRICS, of Spring4 Limited.

The LPA's Position

- 6.5 It is understood that the Council contends that the baseline for this appeal is that effectively there is no lawful use at the Site (*nil use*). The LPA's case is now presented on two grounds, 1) that no lawful use has been demonstrated by the Appellant, and 2) that even if lawful use was demonstrated, that there is no realistic prospect of it continuing. In my view, neither position provides a reasonable basis for adopting a nil use baseline.
- 6.6 As set out above, the Appellant relies on third party evidence from the University of Roehampton, and evidence from a chartered surveyor with long standing factual knowledge of the Site. The evidence clearly shows continuous residential and associated institutional use of the Site in significant detail over a period of 25 years.
- 6.7 With regard to the LPA's assertions on the prospect of reuse, this is a wholly new argument that did not form part of the original analysis in the Officer Report or reasons for refusal. I fully acknowledge that there is a current lack of demand for student accommodation by the University of Roehampton and for other HEI institutions. The Appellant has recognised the lack of a reasonable prospect of demand in its Statement of Case (for example at paragraph 4.17) and referred to the evidence for that. However that is different from saying that there is no realistic

prospect of re-use at all. Clearly, the Site is unlikely to be re-used for student accommodation in the short term but in my view the baseline does not depend on whether a particular use is likely to be re-occupied in the short term to be considered material. The current lack of demand for student accommodation, in my view, does not mean that an established use can be considered to have ceased completely and it certainly does not justify a nil use position.

- 6.8 The buildings on Site remain capable of occupation and have not been subject to any material change since last in use. The Site remains actively managed, with on-site wardens, security and ground upkeep, and cannot be considered to have been abandoned.
- 6.9 The LPA's position is misconceived. The LPA at various stages has sought to assert that the onus is on the Appellant to show an established use. I do not understand where in policy terms such an onus arises, but nonetheless I consider that the analysis above has demonstrated what the existing use of the Site is. Critically, the Council have so far failed to explain what the consequences are in terms of planning harm and in terms of their position (despite numerous requests for them to clarify their position) and so I cannot comment on that further at this stage, but its position appears to be intended to artificially exaggerate any perceived harm.

b. Principle of Development

- 6.10 The appeal proposals seek planning permission for the use of buildings as a hostel (Temporary Accommodation) (Sui Generis) with associated landscaping and cycle parking, with the exception of Mount Clare House and the Temple which will be maintained in the interim until a longer term solution can be found.
- 6.11 The principle of the proposed development is informed by;
- 6.11.1 The existing mixed use/ residential character and appropriateness of the location of the Site,
 - 6.11.2 The planning policy framework supporting specialist accommodation to meet identified needs, and
 - 6.11.3 The relationship between the proposed Temporary Accommodation and the longer-term aspirations for the Site, under Local Plan Site Allocation - RO2.

(i) Existing Use, Character and Location of the Site

- 6.12 The Site has a long established residential and institutional character and use, having accommodated student and ancillary residential uses across the Site for decades. This established character and use provides an appropriate baseline against which the impacts of the proposed hostel accommodation can be assessed.
- 6.13 The s192 Appeal decision commented that the current use was regarded to be student accommodation, last providing 180 student rooms within Blocks A-E, with additional accommodation (28 bedrooms) and communal facilities in Picasso House, and ancillary accommodation such as The Lodge. Whilst the previous tenant, the University of Roehampton

more recently introduced some office and temporary storage uses to Picasso House and Mount Clare House associated with their wider use, and sublease to Citizens Advice Bureau for part of the ground floor in Picasso House, the overwhelming character of the campus remains one of residential accommodation and associated activity.

- 6.14 With regard to the existing student accommodation, and the requirements under LP policy LP28, it is my view that the loss of student accommodation should not be resisted, by reason that the need for student accommodation at the Appeal Site is limited. This position is supported by a letter from the University of Roehampton dated 21st August 2025 and a letter from Sring4 dated 22nd July 2025, which advise that there is a lack of need for student accommodation at this location.
- 6.15 The LPA, in their SoC confirms that there is no substantive evidence that the Appeal Site is required for student housing and therefore agrees with the Appellant on this point. Accordingly, the parties are agreed that the loss of student accommodation is acceptable.
- 6.16 Policy LP28 also requires compliance with other housing policies in the local plan. The proposed use, as Temporary Accommodation, respects the established character and meets an identified need which is discussed later in my evidence. Whilst the end user is different, they are similar to the former use in their more transient nature. The proposed development does not introduce a fundamentally new or different use to the Site in terms of character.
- 6.17 Through the re-use of the existing buildings, and whilst efficiencies are shown to be made through better use of the existing floorspace available, the proposal does not result in a materially more intense use than the former student accommodation, which would again respect the established use and character of the Site.
- 6.18 Moreover, the established form and layout of the buildings across the Site were originally designed for residential occupation on a non-permanent basis. The existing Site layout, access and servicing arrangements are therefore inherently suited to the proposed TA use.

Location

- 6.19 It is understood that transport matters are not in dispute, which is confirmed in the LPA's SoC, and that the proposed development is unlikely to give rise to any severe transport impacts.
- 6.20 However, the LPA's SoC notes Local Plan Policy LP31, and that it supports specialist accommodation where it is appropriately located and has access to public transport, shops, services and leisure facilities appropriate to the needs of intended occupiers.
- 6.21 Detailed assessment of accessibility, sustainable travel and access to local facilities is set out in the submitted Transport Proof of Evidence by Mr Lewis of Velocity, on which I rely. His evidence demonstrates that the Site benefits from good accessibility to public transport and a wide range of extensive local facilities, confirming that it is suitably located for the proposed use. Local facilities include retail, GP surgeries, pharmacies, community centres, libraries and recreational facilities, all of which are a short walk away and accessible without reliance on a private car.

- 6.22 The Site is therefore capable of supporting the proposed TA use, and taken together with the evidence prepared by Mr Lewis, and the LPA's confirmation that transport is not a matter of contention, the use would be appropriately located which clearly significantly weighs in favour of the proposed use.

(ii) Specialist Accommodation

- 6.23 Having regard to the evidence prepared by Anna Cooley of Altair, local authorities have a statutory duty under the Housing Act 1996, as amended by the Homelessness Reduction Act 2017, to secure accommodation for households who are homeless or threatened by homelessness. TA is recognised by local authorities as a means to meeting that duty, pending provision of suitable longer-term accommodation.
- 6.24 The NPPF (chapter 5) supports the delivery of housing that meets a range of needs, including specialist accommodation, and this includes accommodation that would be provided to meet statutory homelessness obligations. Paragraph 61 notes that, *"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."*
- 6.25 Having regard to the evidence of Ms Cooley, the requirement for Temporary Accommodation has clearly reached critical levels. London continues to accommodate a disproportionate number of households in TA, which reflects acute affordability issues and the general undersupply of housing across the capital.
- 6.26 The shortage of suitable TA has resulted in an increased reliance by local authorities, including Wandsworth, on high cost and nightly paid accommodation, including B&B's and hotels which are unsuitable and financially unsustainable.
- 6.27 The London Plan recognises the scale of homelessness pressure across London and promotes accommodation to meet these acute housing needs. London Plan Policy H12 recognises accommodation for homeless households as a form of specialist accommodation and is supported in principle, subject to demonstration of need, management and appropriate design standards.

Need

- 6.28 As set out within the evidence prepared by Anna Cooley of Altair, a specialist in the sector, Wandsworth is experiencing severe pressure in relation to the provision of Temporary Accommodation. It is understood that the borough has one of the highest rates of TA usage in the country, with demand outstripping supply.
- 6.29 The need for TA cannot be disputed, and it is not disputed by the LPA. The LPA have not challenged the acute need for Temporary Accommodation. The Council's own Housing and

Homelessness Strategy (2023-2028) identifies rising numbers year on year, and a significant reliance on nightly paid accommodation, and use of hotels etc, often located outside of the borough. Wandsworth also acknowledge the financial and social consequences of such provision. During 2024/5, 4,472 people made a homeless application, increased from 3,307 (increase of 35%) in the previous year.

- 6.30 The Council's own report, to the Housing Overview and Scrutiny Committee, dated 27th November 2025 reports the total number of households in TA by English LA's is 132,410 (an all time high), of which the 33 London Boroughs had 74,720 (also an all time high). This is discussed in the evidence of Anna Cooley.
- 6.31 Spending on TA in Wandsworth has significantly increased over the years, driven by the shortage of appropriate accommodation. At the end of June 2025, 55% of all TA was in the Borough, with 13% in adjoining boroughs, and 31% elsewhere in London or outside.
- 6.32 The need for the proposed accommodation is therefore unquestionable; however, it is understood that the LPA will now argue that the proposed development will not meet their needs. This appears to be a new position as the scale and nature of the need has been acknowledged by the Council at officer level and the Council have previously considered the Mount Clare site as one suitable for TA.
- 6.33 Firstly, the Council bid to purchase Mount Clare House in order to use it as TA. This was established through an FOI request through Wandsworth Council, which confirms the Council bid on the property on October 17th, 2023, at around c.£4.5m. Internal correspondence from the LPA, dated 16th October 2023, (**Appendix 3**) stated;

"Securing consent for a future development of the site is clearly likely to be challenging given the conservation and heritage issues. The vendors are promoting the site as one with significant development potential (and this is reflected in their guide price of £8m). Assuming we can make TA work in the medium term then the issue of a wider redevelopment would be an issue for the future, but the site clearly has potential despite its constraints. Initial work by Housing Services suggest there are potential savings to the General Fund if we were possible to utilise the student blocks for TA. Whilst there are clearly risks and uncertainties around the site I still believe, on balance, it is worth us submitting a conditional bid"

- 6.34 The Council were unsuccessful in their bid, however their interest in the Site, for TA, did not end there. A series of communications were held between the Appellant (the successful bidder) and Mr Worth through early 2024. Relevant correspondence is attached at **Appendix 4**.
- 6.35 As recorded in meeting notes of July 2024 with the Council's Housing Director (Mr Dave Worth), the Council confirmed its chronic shortage of suitable accommodation, and advised many households in TA were placed outside the borough (See **Appendix 5** - these notes were not been agreed in writing with the LPA at the time, however the Appellant confirms that they accurately reflect the discussion). The notes further confirmed that securing Mount Clare campus would

save the Council ‘many millions per annum’ by reducing its reliance on nightly paid and hotel accommodation. The Council also identified a clear requirement for self-contained accommodation for families.

- 6.36 The Council’s counter argument that the appeal Site is now not suitable to meet its needs (as per email dated 18th December 2025, attached at **Appendix 6**) for Temporary Accommodation is therefore not understood, nor is it supported by the evidence at this stage. In the absence of clear evidence why the appeal proposals would now suddenly be unsuitable (asserted by the LPA on 16th December 2025), such an assertion carries limited weight in my view, particularly when having regard to foregoing correspondence of need and interest in the Site with clear intent to purchase the site for TA use, and the overall planning balance.
- 6.37 The proposed development does not displace general housing delivery and would not undermine housing delivery. By freeing up Council budgets otherwise spent on nightly-paid TA, the scheme indirectly supports long-term affordable housing delivery.
- 6.38 The appeal scheme provides 265 rooms, with a range of unit types (135x1b, 49x2b, 7x3b, 1x5b, 1x6b) that align with the demographic of households currently living in TA in Wandsworth, as noted in the evidence of Anna Cooley. Ms Cooley’s Appendix 4 refers to the 27th November 2025 Housing Overview and Scrutiny Committee paper which reports that 47% (2,178) of households in temporary accommodation require a studio or one-bedroom, which would align with the accommodation offer at Mount Clare. A significant proportion of households require studio or one bed accommodation, within a managed setting. The proposed development would therefore make a meaningful contribution to addressing an identified shortfall.

Over-Concentration

- 6.39 There is no evidence before the Inquiry to suggest the proposals would result in an over concentration of TA or give rise to adverse impacts on the Site or neighbouring amenity. The Site is not located within an area characterised by comparable uses or a large concentration of them, nor has the LPA identified cumulative harm arising from the development. The Site has historically, since the 1960’s, been used to house predominantly single persons, therefore concerns suggesting that the development will lead to an unacceptable concentration of single persons is unfounded.
- 6.40 The LPA allege at 5.27 of their SoC that the development would result in an over-concentration of single person households in that “*over 80% of the rooms are for single people*”. However, having regard to the proposed accommodation schedule issued by KSR, this confirms that of the 193 units proposed, 136 units comprise 1b, with the remaining 57 units comprising 2b+. Accordingly, 30% of the units proposed are 2+ bed accommodation.
- 6.41 The Mount Clare site is distinct from its neighbouring streets, and all of the facilities requirements can be met within its buildings and landscaped grounds. The extensive grounds provide ample separation from neighbouring buildings and uses. The scheme would operate as a managed facility with on site management, further reducing potential perceived off-site impacts.

Historically, the Site has been a good neighbour and there is no evidence presented to this Inquiry of any complaints over the years.

Management

- 6.42 An outline Management Plan has been prepared (and is appended herewith) setting out a 24/7 staff presence, visitor controls, security, CCTV and safeguarding measures, as well as maintenance and management and conduct expectations for future occupants. A final management plan can be secured by condition, requiring full details prior to occupation.

Design Suitability

- 6.43 The TA accommodation will be housed in existing buildings dating from the 1960's. The buildings were designed for residential use. The buildings do require refurbishment and internal improvements to get them up to a modern standard, however they are fundamentally compatible with hosting communal residential use.
- 6.44 Detailed consideration of the design quality of the spatial standard, the accessibility and internal and external amenity is set out in the evidence prepared by Mr Curtin of KSR Architects. Mr Curtin explains the design principles applied to the refurbishment and assesses the accommodation against the 'Setting the Standard' guidance, which is recognised as the London wide benchmark for TA. His evidence demonstrates that the proposed rooms and the shared facilities are of an appropriate size and layout, and that their quality will meet their intended purpose, capable of achieving a high standard of accommodation (consistent with Grade A expectations, as set out within Setting the Standards).
- 6.45 In planning terms, the appeal Site is inherently capable of accommodating managed specialist accommodation, as it has done for many years. The appeal proposals therefore align with the aims of London Plan policy H12, and the Local Plan policy LP31, which support specialist accommodation where it meets an identified need, is suitably designed and is capable of appropriate management.

(iii) Allocation RO2

- 6.46 The Site is allocated within the Wandsworth Local Plan, under Site Allocation RO2.
- 6.47 The Site Allocation identifies the potential for a mixed-use development of the Site, including residential uses, subject to heritage considerations and future use of the Temple. In my view, the proposal complies with the site allocation for mixed-use development with residential uses.
- 6.48 The Officer delegated report, page 16 acknowledges that the Site Allocation "*...is flexible in nature and does not specify housing type or quantum of residential units*".
- 6.49 The proposed use, for TA, comprises residential use. This is accepted in the Council's SoC (Appendix 1, page 19), and that "*it is clear that the proposal would meet some of what is an acute need and significant weight is given to this fact...*"

- 6.50 Additionally, opportunity remains to find an appropriate use for the listed buildings, particularly the Grade I listed Mount Clare House, which is expected to accommodate a non-residential use, therefore meeting the overall land use aspirations of the Site Allocation.
- 6.51 Site Allocation RO2 is a high-level strategic allocation. It is intended to guide the long-term use and development of Mount Clare Campus but clearly does not prescribe an immediate need for a single comprehensive redevelopment.
- 6.52 RO2 does not preclude phased development, nor does it require comprehensive redevelopment at once, or at all. It also does not prescribe a specific quantum of development. This is contrary to the LPA's assertion that development proposals must address the Site allocation in its entirety.
- 6.53 The allocation acknowledges the complexity of the Site and in my view, it anticipates phased development of the Site. The appeal proposals are entirely consistent with the allocation. The proposed works do not affect the listed buildings, nor do they alter the landscape (Registered Park and Garden and the Conservation Area significance).
- 6.54 The proposed works consist of internal refurbishment together with modest ancillary elements associated with the appropriate re-occupation of the Site. These works do not prejudice the future development or redevelopment of the Site should a comprehensive scheme come forward at a later stage.
- 6.55 In that regard, the proposed development represents an appropriate initial phase of the Sites reuse. RO2 anticipates a phased development approach as it acknowledges the heritage assets require substantial investment and that the Site is complex and unlocking its long-term potential requires due consideration. The appeal proposals will provide a more immediate return to active use, one that is managed and will generate income that will be reinvested into the Site's heritage buildings. The prompt reuse of the Site will also prevent further deterioration and create a stable basis from which further proposals can emerge.
- 6.56 I note that the allocation sets out various development considerations and design requirements. One of those planning considerations (at 9.30) refers to *"any proposals must consider the future role of the Doric Temple and provide a scheme for its long-term management and maintenance"*. I note that paragraph 9.30 does not require a future role to be specified, merely that it should be considered as a factor when considering development within the allocated site. The Appellant has factored this in; it intends to bring forward separate proposals for Mount Clare House and the Temple once the proposed operations are established and revenue streams allow for future reinvestment, however in the interim the listed assets will be appropriately managed and maintained/preserved (to be secured by condition). The scheme also does provide for its long-term management and maintenance, since it is proposed to secure a planning condition setting out the management and maintenance approach for the Temple as part of the development proposals, ensuring that it is managed and maintained in good order in perpetuity.
- 6.57 Furthermore, proposals for the listed buildings will inherently take more time to resolve, they are complicated and sensitive structures. Future proposals for Mount Clare House and The

Temple will need more time to be considered. This should not prejudice the more immediate use of the wider Site to meet other demonstrable needs, and appropriate re-use of established buildings across the Site.

- 6.58 I also consider that the scheme meets the other development considerations at 9.31 – the impact of emissions from traffic (construction and occupation) on Richmond Park Natura 2000 site and promote the introduction or enhancement of Stag Beetle habitats in consultation with Natural England’s Discretionary Advice Service.
- 6.59 The proposed development takes a fabric first approach, avoiding wholesale redevelopment. This is the most sustainable approach, but also the most effective approach (when compared against redevelopment) to avoid the impact of emissions from construction traffic. With regard to traffic associated with occupation, this has been considered in the LPA’s SoC. Appendix 1 of the SoC, Officer Report, it states on page 39 that, *“As advised by the Transport Officer, the proposed change of use would result in a net increase of 14 two-way private vehicular trips between 07:00 and 19:00, a net increase of 17 two-way bus trips in the same period, 51 two-way trips, 17 two-way underground trips, 28 two-way pedestrian trips and 10 cycle trips. The development would therefore have no severe impact on the operation of all modes of transport in the traditional peak period of 08:00 – 09:00 and 17:00 – 18:00....even if the lawful use of the site has not been demonstrated, the Council does not consider that the likely number of trips generated by the development is likely to result in severe impact”*.
- 6.60 Accordingly, applying either the Appellant’s baseline position, or that of the LPA, the development would comply with this part of 9.31 of RO2.
- 6.61 With regard to the promotion of the introduction or enhancement of Stag Beetle habitats, a planning condition is currently proposed which will secure this requirement. At the time of writing, the latest drafting of this condition reads *“No development shall take place until an ecological management plan, in accordance with Ecological Report (AAE Environmental December 2024) has been submitted to and approved in writing by the local planning authority”*.
- 6.62 In terms of design requirements, paras 9.32, 9.33 and 9.35 state that any development will need to respect the scale and setting of the heritage assets, and any replacement of the 1960s building should seek to re-assess the landscape significance of the Site. 9.35 refers to appropriate building heights and clarifies that the site is located in a tall or mid-rise building zone and that tall or mid-rise buildings will not be supported. These paras clearly relate primarily to new built form and do not apply as the buildings are not being replaced.
- 6.63 Finally with regard to para 9.34, this states that *‘redevelopment should consider reinstating the pond in front of the Temple’*. As no redevelopment is proposed, this para is not triggered by the proposed development, however biodiversity improvements can be achieved nonetheless through the above-mentioned ecological management plan, and additional planting (landscaping condition is also proposed to be secured).
- 6.64 In summary, the proposal clearly accords with Site Allocation Policy RO2.

- 6.65 Furthermore, the proposed development recognises London Plan Policy D3, which seeks optimisation. The proposals avoid physical interventions that could limit development/redevelopment and allows future flexibility. The proposed development will enhance the baseline from which future proposals will be considered.
- 6.66 There is an urgent and well-documented need for Temporary Accommodation in Wandsworth, and indeed across the Capital. The proposal addresses that need in a manner consistent with London Plan H12 and the NPPF (2024). Should Wandsworth Council argue that the Site does not meet their needs, noting that they are intending to state that the facility raises issues of quality and costs in running such a facility, it will be capable of serving the needs of other London boroughs who also have the same statutory duty.
- 6.67 In summary, the Site is inherently suited to accommodate TA use due to its long-standing residential character, layout and capacity for managed occupation. The scheme complies with Site Allocation RO2 does not preclude future development. The proposals will get the Site back into use and enables future investment into Mount Clare House and the Temple. Future, Stage 2 proposals remain entirely achievable and will be supported through the delivery of the appeal proposal.

Optimising Site Capacity

- 6.68 A main matter in dispute is whether the proposed development optimises the capacity of the Site for housing delivery, taking into account need, housing mix, mixed and sustainable communities, as well as the heritage constraints and allocation under RO2.
- 6.69 Policy D3 requires development to make best use of land, be design-led responding to context and character. Optimising site capacity means 'ensuring that development is of the most appropriate form and land use for the site, it does not seek the most intensive form.
- 6.70 In this case, the Site lies within a Conservation Area, partly within an RPG, in the setting of two highly graded listed buildings, and in a landscape where built form and openness are defining heritage characteristics added to this is the presence of a substantial number of trees and TPO trees. The capacity for the Site is therefore heavily constrained by heritage significance, as RO2 acknowledges and raised internally by the Council's officers as they prepared their bid for the property (see **Appendix 3**). These matters are also further explored in the evidence produced by Charles Rose of The Heritage Practice.
- 6.71 The Appellant's have previously sought pre-application advice from the LPA, in February 2024, seeking the intensification of existing building on the Site, through upward and lateral extensions to existing buildings, with a view to optimising the Site. Relevant extracts from the submitted pre-app are included at **Appendix 7**). However, pre-application advice received from the LPA confirmed that opportunities for further intensification in this manner would be limited in light of the identified constraints, principally the effects on the setting of the Grade I listed building, landscaping and TPO's.

- 6.72 Regard is also had to Site Allocation RO2, which states at para 9.35 that in accordance with the tall and mid-rise building maps in Appendix 2 (of the Local Plan), the Site is not located in a tall or mid-rise building zone. Development proposals for tall or mid-rise buildings will not be supported, which are defined as building taller than 4 storeys (Local Plan policy LP4).
- 6.73 Informing the Appellant's approach to the development, in part, regard has been given to the NPPF, London Plan, and Local Plan policies which seek a fabric first approach to development. Of relevance is Local Plan Policy, 'Responding to the Climate Crisis', which states that developments will be required to achieve high standards of sustainable design and construction in order to mitigate the effects of climate change. In order to mitigate the effects and achieve the Council's target of becoming a zero-carbon borough by 2050, development proposals should (A)(5) – *retain existing buildings and their embodied carbon in renewal and regeneration projects where this is a viable option*". The support text adds that *"The existing building stock in Wandsworth makes a significant contribution to the borough's carbon emissions and therefore could have a positive role to play through where possible retention and refurbishment. As such, conversions, extensions and refurbishment of existing buildings, including for a different use, present an opportunity to reduce carbon dioxide emissions through retrofitting"*.
- 6.74 Having regard to the Site constraints identified, and the clear policy principle of retention over redevelopment where possible, the proposals are considered to achieve optimum 'development' in light of heritage, context and policy objectives, through the appropriate reuse of the significant existing built form that already reflects a heritage sensitive layout.
- 6.75 The proposals do not intensify development, e.g. with taller buildings, or extended footprints, which avoid harm to the Conservation Area, RPG and the setting of the two highly graded listed buildings. However, through the appropriate rationalisation of the 1960's buildings, it makes them appropriate for continued use and reuse/refurbishment, reasonably increasing density at the Site.
- 6.76 The proposals do not under optimise the Site and the re-use of the significant existing built form is entirely consistent with sustainable intensification, as recognised in the NPPF (2024) and London Plan SI policies, and the Local Plan (LP10).
- 6.77 In summary, the proposals represent a design-led optimisation of the Site in accordance with London Plan Policy D3. The proposals respect the heritage consideration of RO2 and preserve the Grade II* Temple whilst making full and efficient use of the significant existing built form that exists on the Site. The proposals avoid intensification of the Site which would likely be regarded as harmful, and the proposals safeguard the longer-term development of the Site.

c. Quality of Accommodation

- 6.78 I have earlier addressed the matter of quality of the proposed accommodation, which is extensively covered in the Proof of Evidence prepared by Mr Curtin of KSR Architects. However, in light of the comments raised in the LPA's SoC, it is important to make clear that the proposed

- use comprises a hostel for Temporary Accommodation use, not C3 general housing or other forms of HMO or Large Scale Purpose Built Shared Living (LSPBSL), as alluded to in the LPA's case.
- 6.79 It is essential to apply the relevant standards for this form of accommodation, and not to confuse it with other standards for, e.g., permanent, or self-contained homes. The proposed use is designed to meet short-term needs for households placed by a local authority, in a hostel setting.
- 6.80 Nationally Described Space Standards (NDSS) do not apply. London Plan Policy D6, relating to minimum floorspace standards also do not apply. These standards relate to permanent, self-contained dwellings designed for long term accommodation. Other standards relating to HMO's or LSPBSL also are not applicable to TA hostels. Therefore in my view Local Plan Policy LP29 does not apply, nor does London Plan Policy H16. This is also addressed by Ms Cooley in her proof of evidence, and I agree with her analysis.
- 6.81 The applicable policy in the London Plan Policy is H12. H12 requires appropriate management, appropriate facilities, and a design suitable for intended occupants, and accessibility where practicable. H12 does not prescribe minimum rooms sizes or minimum requirements for communal facilities. The proposal complies with this policy.
- 6.82 Wandsworth Local Plan contains several design and quality policies, including LP8 and LP31, but again none provides explicit standards that should be applied to Temporary Accommodation. Policy LP8 encourages safe, well-designed and functional living environments, whilst LP31 is more explicitly applicable to C2 and C3 uses, not Sui Generis, TA accommodation.
- 6.83 Wandsworth Council refer to HMO standards being applicable to the TA accommodation proposed. However, based on the evidence by Ms Cooley and Mr Curtin, these are management and licencing standards, not planning policy. They do not apply to Temporary Accommodation used for placements.
- 6.84 'Setting the Standard' in non-statutory guidance produced by the Mayor of London and London Councils. It is not a development plan document, SPD or policy requirement but it does provide a good-practice benchmark for TA quality. As set out in the Proof of Mr Curtin, the proposal aligns with the guidance in all respects.
- 6.85 From a planning perspective, the accommodation proposed offers significantly higher standard of accommodation than many forms of TA currently available across Wandsworth (e.g. hotels and B+B's), and wider London.
- 6.86 The accommodation meets A grade accommodation, having regard to Setting the Standard, as explained by Mr Curtin. It also meets accessibility requirements for wheelchair users as explained by Mr Curtin in his evidence, noting that it is proposed to convert the ground floor of Picasso house to be accessible units. There is level access to these units available via the existing entrance facing Mount Clare. The unit will provide seamless, barrier-free entry for all users, including individuals with mobility impairments. The unit will feature wide doorways, flat thresholds, and an open-plan layout to facilitate easy movement. Bathrooms will be equipped

with roll-in showers, grab rails, and lever-operated taps for enhanced accessibility. Kitchens will incorporate adjustable-height counter tops and accessible storage solutions. Flooring will be smooth and slip-resistant for added safety. This design will provide an inclusive, comfortable living environment for all residents.

- 6.87 Based on the correct policy position, and when considering the correct land use proposed (ie. not C3, not HMO, not LSPBSL) the proposals deliver high-quality accommodation and accord with the development plan's policy requirements for accommodation of this kind. The proposals deliver en-suite rooms, kitchenettes and a range of unit sizes. Picasso House provides shared kitchen, communal amenity areas, managed offices, secure cycle storage and refuse/laundry facilities, all set within high quality landscaped grounds, providing dignified short-term occupation. The proposed development in my view, and based on Ms Cooley and Mr Curtin's evidence, is entirely appropriate for households placed in TA under the Council's statutory duties. When considered in the location, with local facilities, the accommodating offering will be exemplary and offer individuals and families to live with dignity.

Comparable Hostel in Wandsworth

- 6.88 Having regard to the above, and the recent correspondence from the LPA asserting concerns with regard to the quality of accommodation proposed and prohibitive costs of management (email from Mr Worth, 18 December 2025 – **Appendix 6**), we are mindful of other recent decisions taken by the Council regarding acquisition of leases for other assets in the borough to address its TA needs.
- 6.89 At the Cabinet meeting of 14th July 2025, the paper (attached at **Appendix 8**) was submitted by Mr Worth, proposing a long-term lease agreement with provision for 186 Temporary Accommodation Units. The recommendation was that the authority enter into a 6 year lease agreement, at a rent that is not more than market rent for the exclusive use of a new temporary accommodation block comprising 186 self-contained units located in the Tooting Broadway ward (understood to be 101-113 Tooting High St). The site previously granted permission for 46 homes, but superseded by a hotel permission, understood to be originally consented under ref 2019/4999.
- 6.90 The paper notes that the units would accommodate households owed duties under Part VII of the Housing Act 1996, that the Council would be responsible for placement and the accommodation would be managed by the private landlord.
- 6.91 The site offered to the LPA is the newly developed 186 hotel schemes, for use as temporary accommodation. There does not appear to be any formal planning application to lawfully change the use of the approved hotel to a hostel/TA, but the offer clearly proposes to guarantee all 186 rooms for TA use.
- 6.92 The paper further notes that "*each accommodation unit has a kitchen and en-suite bathroom*".
- 6.93 The paper further notes that the owner has "*offered the scheme to Wandsworth first but is open to offering it to other boroughs*".

- 6.94 Alongside accommodation management, the paper further notes the amenities that the site would offer including repairs, on-site personnel, first aiders, insurance on all units, Wi-Fi, reconfiguration of rooms to maximise use, outdoor play space, communal laundry, study space, and units for those with mobility issues.
- 6.95 The paper further notes that *“the Council has not entered into such agreement as inevitably some expenditure is at risk of being ‘wasted’ during void periods. However, with the market being as it is, securing such an agreement in return for stability and a reduction in rates compared to most expensive current provision elsewhere, often well outside the borough, makes operational and financial sense...”*
- 6.96 It further notes that *“Providing accommodation within the borough would decrease statutory s202 suitability reviews and complaints about temporary housing location, especially concerning disruption for families around continuity of education and/or in seeking family or other support for example. The accommodation has been designed and built out to cater for small families e.g. parent(s) with one child and would not be used for more vulnerable or chaotic households”*.
- 6.97 The recommendation was approved.
- 6.98 A typical floor plan taken from a current live s73 application relating to the site (2025/0453) is attached at **Appendix 9**). The accommodation illustrated is not dissimilar to that proposed under the appeal scheme, at a similar if not greater density, but on a much more constrained Site. Furthermore, the list of facilities quoted above all reflect the facilities that would be provided by the appeal scheme, albeit the appeal proposals would benefit from a much greater degree of open landscaped amenity.
- 6.99 Drawing these matters together, the Council’s recent approval of a long-term lease for a comparable hotel-based TA scheme further demonstrates that accommodation of this nature is acceptable by the authority for households in TA. Accordingly, when assessed against the correct land use, the proposals deliver high quality and appropriate TA.

D. Affordable Housing

- 6.100 A main issue is whether the proposed development should provide affordable housing. In my professional opinion, and having clarified the land use propose above, and further supported by specialist advice from Red Loft (attached at **Appendix 10**), there is no policy basis for requiring affordable housing as part of this Sui Generis Temporary Accommodation proposed.
- 6.101 The Council’s Statement of Case seeks to rely on Wandsworth Local Plan Policy LP29, which relates exclusively to Houses in Multiple Occupation (HMO’s) and Large Scale Purpose-Built Shared Living (LSPBSL). As confirmed in the Red Loft note, it is explicit that LP29 applies only to these defined typologies, not to Temporary Accommodation for households placed under homelessness duties in a hostel.

- 6.102 The appeal scheme is not HMO, nor is it LSPBSL. The proposed development will not operate as a market housing. The occupation of the proposed accommodation is nomination based, serving households placed under homelessness duties and would be restricted by condition (a condition which may be agreed between the Parties).
- 6.103 Local Plan policy LP31 is also not considered to be triggered by the proposed development. Whilst the policy refers to specialist and supported housing, the application of Policy LP31 is framed by relevant London Plan affordable housing policies. LP31 refers more specifically to housing within Use Classes C2 and C3, whereas the appeal scheme is Sui Generis.
- 6.104 Having regard to LP31, and the land use proposed, the correct London Plan Policy applicable is H12, which refers to supported and specialised accommodation for people experiencing homelessness, housing requiring temporary accommodation, and vulnerable groups. Policy H12 explicitly does not seek affordable housing. Red Loft confirm that such accommodation is not subject to Policies H4, H5 or H13 (affordable housing policies) of the London Plan. They further confirm that the accommodation is not market-led shared living under policy H16 and is not required to provide affordable housing contributions.
- 6.105 The above is further supported by correspondence received directly from the GLA (**see Appendix 11**). The GLA have explicitly confirmed that, *'The London Plan currently requires affordable housing contributions from the following forms of residential development: Class C3 housing (including specialist older person's housing if this constitutes self-contained housing as opposed to care home accommodation), Large Scale Purpose Built Shared Living/co-living (sui generis), and student accommodation (sui generis – note that only affordable student accommodation is required in this case). No other forms of residential accommodation attract an affordable housing contribution, including Class C2 or sui generis care home/hostel type accommodation. Therefore, if the proposals do not constitute C3 housing or co-living, then they would not be subject to affordable housing requirements.*
- 6.106 The correspondence further clarifies that *"The sui generis accommodation you describe would not attract an affordable housing requirement. Assuming the accommodation would be secured as specialist accommodation in the planning permission (as opposed to co-living accommodation that could be occupied by anyone), and occupants would not be charged market rents (e.g. for a co-living type product), **the accommodation would be viewed as a form of affordable housing in any case**".*
- 6.107 The proposed accommodation is provided at sub-market costs. As the Red Loft note makes clear, residents would not pay market rents, and the accommodation would be restricted to those households in urgent need.
- 6.108 Accordingly, the development plan does not require the proposed TA hostel to make an affordable housing contribution, and the LPA's position is considered unreasonable and inconsistent with the Development Plan when read as a whole. The Council's position is unjustified, and contrary to specialise advice and the GLA's interpretation.

- 6.109 The GLA position is clear that the scheme does not attract affordable housing contribution and in itself is a form of affordable housing. The proposals provide a form of affordable accommodation and serve a high priority social need.

e. Energy and Sustainability

- 6.110 Energy is now confirmed as a matter no longer in dispute. However, as noted earlier in my evidence, energy and sustainability goes to the heart of the appellant's approach for development at the Site.
- 6.111 Planning policy at all levels strongly supports the reuse of existing buildings, and for the provision of appropriate forms of specialist forms of housing. The NPPF emphasises the reuse of existing building as a key objective, and changes to Local Plan policies further encourage this approach, for example LP10(A)(5) which requires all development proposals to "*retain existing building and their embodied carbon in renewal and regeneration projects where this is a viable option*". The proposals align with these principles.
- 6.112 Consult Sustainability Limited (CSL) were appointed to undertake a Whole Life Carbon Assessment (WLCA) for the proposed refurbishment. Their assessment indicates that the Cradle to grave emissions for the development have been calculated at 289 kgCO₂/m². By comparison, CSL advise that if developed as a new-build of equivalent area, a typical embodied carbon intensity of ~900–1,200 kgCO₂e/m² would be expected. This represents a ~65-75% reduction in upfront embodied carbon, solely due to retention of existing structure and prioritisation of circularity.

f. Planning Balance

- 6.113 I have shown in my evidence that the proposal accords with the development plan when read as a whole and gives no rise to conflict to justify refusal.
- 6.114 Where minor harm exists, they are outweighed by the scheme's strong conformity with key policy objectives, particularly London plan H12, and the pressing public interest in meeting Temporary Accommodation need.
- 6.115 The separate Heritage proof concludes, rightly in my view, that the proposals results in no harm, to the setting or significance of the Grade I listed Mount Clare and the Grade II* listed Temple and that the proposed change of use and repair work to the Lodge will reintroduce footfall and passive surveillance on the Site, to the benefit of the listed buildings. As a result of the limited scale and scope of the physical change to the Site, there will be no harm to the land setting or conservation area either.

- 6.116 Indeed, it is reasonable to assume without the scheme that the listed buildings and the Site will fall into further disrepair and could be subject to anti-social behaviour impacts. Having life and people on Site will assist in the preserving of the assets and ensure their long-term survival.
- 6.117 Notwithstanding the above position, the proposed development nonetheless delivers a significant package of planning/public benefits. The key benefits of the proposed development and their weighting are summarised below (using the range *moderate, significant, very significant, substantial, very substantial*):

Planning Benefit	Weighting
Meeting demonstrable acute need for TA in Wandsworth	Very Substantial
Meeting demonstrable acute need for TA for other London Boroughs	Very Substantial
Enabling Households to remain in the brough	Substantial
Reducing reliance on nightly paid accommodation, Council revenue expenditure	Substantial
High Quality Accommodation	Significant
On-site Management	Moderate
Re-use of existing buildings/ embodied carbon reduction	Very Substantial
Bringing site back into use, improved surveillance, security (anti-social behaviour)	Moderate
Maintenance of heritage assets	Substantial
Landscape maintenance and improvements (play space)	Moderate
Increased cycle parking/sustainable transport options	Moderate
Short term construction and job creation	Moderate

- 6.118 The appeal proposed would bring the Mount Clare site back into active, managed use through the re-use and refurbishment of substantial 1960's buildings to deliver 265 bedrooms for much needed TA.
- 6.119 The proposed development most fundamentally helps to address the acute need for TA, helping reduce reliance on nightly paid accommodation (such as hotels or B+B's) and furthermore, supporting Wandsworth households to stay in the borough.
- 6.120 The proposed development achieves this significant TA provision through a fabric first approach, retaining embodied carbon as endorsed by policy, and while preserving the character and significance of the heritage assets within and surrounding the Site.

- 6.121 The proposed development complies with RO2. The proposal is a residential use, is deliverable, immediate and very much needed. It may not be the comprehensive redevelopment or housing type that the LPA would prefer, nor the comprehensive redevelopment the LPA aspire to, but these are considered undeliverable and unviable having regard to the planning history and site constraints.
- 6.122 The proposed development does not prejudice the further development of the Site, as allocated under RO2. Immediately, it does however preserve the listed assets on Site, which will be maintained as a result of the development and until a future role and appropriate use can be found.
- 6.123 The public benefits are considerable and must be given significant weight in support of the development proposals. The development has the immediate ability to transform the lives of hundreds of people, including single persons and families, addressing the Council's acute shortage of TA accommodation. There is an abundance of local facilities, the Site is accessible and well serviced and within a high-quality landscaped setting. The re-use of these building also addresses sustainability (fabric-first) policies and should be supported in policy terms, deliverability and from a societal perspective.

7.0 SUMMARY AND CONCLUSIONS

- 7.1 The appeal proposals seek the appropriate reuse of Mount Clare Campus for Temporary Accommodation (TA), which I have found to be acceptable in planning terms and that it accords with the Development Plan when read as a whole.
- 7.2 The Site has a long established residential and institutional character and use, most recently used for student and staff accommodation by the University of Roehampton. The Temporary Accommodation hostel proposed is consistent with the long-established use, Policy RO2 and character of the site. It will not introduce a materially different use in terms of character, nor one that will be harmful.
- 7.3 The Council's assertion of nil use (if that is what it asserts) is not supported by evidence. The Council have not presented a positive case as to what it says the use is and so I cannot comment further on its case in this regard, and what it says the planning consequences (if any) are at this stage.
- 7.4 There is an acute need for TA in Wandsworth and across the capital. The proposed development would make a meaningful contribution to meeting that need.
- 7.5 The site is appropriately located to serve the proposed use. Transport matters are confirmed to not be in dispute. The Site layout, and its original built purpose are inherently suited to the proposed site. The accommodation proposed is appropriate for its purpose, with a standard of accommodation designed to relevant standards. The amenities provided, together with the landscape setting will provide a high quality of living.
- 7.6 The development comprises a good mix of units, in an area which is not noted to accommodate other similar uses. There is no evidence to suggest that the development would result in an over concentration of single person accommodation, indeed the concentration of single persons would be less than that since the 1960's.
- 7.7 There is no policy basis on which an affordable housing contribution should be sought. This position is supported by the GLA who regard TA as a form of affordable housing. To generate an affordable housing contribution, the LPA are misclassifying the proposed use.
- 7.8 The scheme preserves heritage assets and will not result in harm. The reuse of the existing buildings respects sustainability policies which promoted reuse and refurbishment over redevelopment where this is a viable option.
- 7.9 The proposed development comprises a deliverable, high quality scheme that will have an immediate effect locally and on the neediest. The Alton Estate has been subject to stalled scheme for some time, and the proposals present a realistic and deliverable scheme. The scheme is viable and is the first step in the development of the Site that will house many, protect the listed assets and optimise the potential of the Site.

- 7.10 Overall, the proposals deliver a substantial package of public benefits with no material harm identified. The development constitutes sustainable development and planning permission should be granted subject to conditions.

APPENDICES