



LONDON BOROUGH OF WANDSWORTH

SUMMARY PROOF OF EVIDENCE
prepared by
Mr Dave Worth
on behalf of London Borough of Wandsworth

Site: Mount Clare Campus, Minstead Gardens, Roehampton Gate, SW15 4EE

Planning Inspectorate reference: APP/H5960/W/25/3371729

LPA Reference: 2025/0074

1. QUALIFICATIONS AND EXPERIENCE

- 1.1. I am Dave Worth, employed as the Council's Director of Housing Services in a full-time capacity. In this role, I hold Chief Officer responsibility for various statutory and non-statutory housing functions. I have held this role since February 2002.
- 1.2. For this appeal and this proof of evidence, specifically I hold responsibility for the Council's compliance and implementation of its statutory duties toward homeless persons, within the framework of the Housing Act 1996.
- 1.3. These include provision of suitable temporary accommodation to those homeless families that qualify for it, and the duty to provide such accommodation within the Council's own district 'as far as is practicable'.
- 1.4. In my proof, I provide evidence with regards to the need for temporary accommodation in the borough, a broad overview of how a person who is in need of temporary accommodation is housed and whether, in my opinion, the accommodation which is being proposed is suitable for temporary accommodation and whether the Local Housing Authority would 'take on' that accommodation.

2. PREVIOUS INVOLVEMENT OF THE LOCAL HOUSING AUTHORITY WITH THIS SITE

- 2.1. The Council's Housing Team previously indicated an interest in the site (around three years ago). I was involved in discussions at the time, visiting the site and expressing the view that it could have been possible to site an 80 self-contained unit scheme.
- 2.2. I would comment that an 80 unit scheme is a very different prospect from what is now proposed as the largest temporary accommodation proposal in the borough. In my proof, I explain that the current scheme is too dense, with units that are too small. Further, I explain that this is not a sustainable location to site such a large facility.

2.3. Andrew Gillick of the Appellant contacted me directly to discuss his proposal to develop a temporary accommodation scheme on the site, with most contact being by email exchanges with one face to face meeting at council premises, also attended by my housing colleagues. I can confirm that the Council's housing team did not confirm that any proposals put forward by Mr Gillick would be considered suitable by them.

3. DUTY TO PROVIDE TEMPORARY ACCOMMODATION AND THE NEED IN WANDSWORTH

3.1. The Council has an ongoing need for good quality, appropriately sized and well managed temporary accommodation units, and ideally for any new provision to be within the borough.

3.2. Where someone is required to be housed in temporary accommodation, it is necessary to consider the fact that they may well need to access facilities which are required for their day to day lives. Placing households outside of the borough has the potential to cause inconvenience in relation to this. That does not mean that all in-borough placements will necessarily be more convenient from this perspective than outside of the borough placements.

3.3. In terms of household demographics, around half of those currently placed into temporary accommodation are single/childless households with the remainder being families with children.

3.4. The Council's statutory duties around housing are engaged whenever a household approaches a local council believing themselves to be at risk of homelessness and their circumstances give the Council 'reason to believe they may be homeless'.

3.5. In Wandsworth, as an inner London borough with some of the highest rental and property prices in the country, housing pressures are chronic, and homelessness pressures are rising at the present time. In the current year it is expected that over 4,000 households will approach the Council and the

borough's use of temporary accommodation is currently at an all-time high, with over 4,500 placements in one or other form of temporary accommodation at the current time.

- 3.6. Despite the pressures, the Council complies with its duties and, for example, is proud of being one of a minority of boroughs that successfully avoids the use of bed and breakfast accommodation for families with children, which is unlawful except in an emergency and then for no longer than 6 weeks.

4. SUITABILITY OF TEMPORARY ACCOMMODATION

- 4.1. Legislation requires that temporary accommodation provided must be 'suitable' in almost all circumstances. Suitability is mostly decided by a council on a case-by-case basis. Issues commonly considered are size and layout, location, accessibility, distance from services, and affordability.
- 4.2. The term 'temporary' accommodation is something of a misnomer, as the average time in such accommodation at the present time is measured in years, not months. It is important to consider any new proposals for temporary accommodation such as this one with the expectation that residents may be resident for many months or possibly years.
- 4.3. Legislation grants applicants (for temporary accommodation) the right to seek review of suitability which is then subject to appeal. Placing those in need of temporary housing in unsuitable accommodation is therefore not a solution for the Council. Where accommodation is considered unsuitable it can be expected that a significant number of complaints, reviews and appeals would arise.
- 4.4. In respect of suitability, there are minimum standards around space and amenity that apply to houses in multiple occupation and the London boroughs. I consider the application of these as part of my proof.

5. **WHETHER OR NOT THE PROPOSAL FOR ACCOMMODATION IS
“SUITABLE”**

- 5.1. I have profound concerns that the scheme as currently designed would not be capable of providing suitable housing to enable routine compliance with our legal duties.
- 5.2. My concerns are that: the scheme is too dense; the units are too small/cramped; the risk of management problems are significant, and the probability of frequent refusals and/or legal challenge/complaints around suitability is too high; and the location is not sufficiently sustainable.
- 5.3. With regards to density, the proposal is for more than 260 households placed within relatively small building footprints. This is a major concern particularly given the demographic of people to whom the Council owes a temporary accommodation duty.
- 5.4. There is a high proportion of those on the waiting list which either have children or are expecting children, and the fact that many others would be single people with a mix of vulnerabilities including physical or mental ill health issues, substance misuse issues, and/or a combination of life experiences rendering them less able to find and keep their own accommodation. The proposal to house people in such a dense manner is of concern.
- 5.5. Second, the individual accommodation units are too small. It is important to remember that the households would be in the accommodation for many months, stretching possibly to years. The evidence of Mr Smith addresses the physical dimensions of the units and whether or not space standards are met.
- 5.6. The rooms will be extremely cramped. I note that many of the rooms appear to have a shower area of little more than 1 square metre (including a toilet)”. There is also proposed to be a kitchenette within the rooms which will additionally take up space.

- 5.7. When considering the size of rooms it is necessary to bear in mind that individuals and families may well have all their household possessions with them.
- 5.8. I consider that the very small rooms are not mitigated by the provision of some limited communal facilities within Picasso House.
- 5.9. In addition to the issue of size, the proposed units, most of which are accessed by internal communal stairs, would not be suitable for disabled households.
- 5.10. I have significant concerns regarding the management of the site. In practice, I consider that this site is likely to be very difficult to manage.
- 5.11. I consider that the location of the site is also unsuitable. The lack of connectivity is likely to mean that access to schools for continuity of education or regularly accessed support or health services, and access to places of employment, would be very difficult for most residents.
- 5.12. At present, and aside from the local convenience store, the main shopping and socialising amenities are as far away from the accommodation units as they could be. Their location would cause real difficulties for less mobile applicants and/or parents with buggies etc.
- 5.13. Overall, I can confirm, the Council's Housing Authority does not consider that the site represents a suitable location on which to site the largest temporary housing facility in the borough. Furthermore, the size of the units and their layout also render the proposal unsuitable.
- 5.14. I can confirm that the Council would not be prepared to take on and manage the facility proposed by the Appellant. Further, it is not considered that it would be suitable to house people on the temporary accommodation waiting list even if it were managed by a different entity. On that basis, I consider that this proposal would not meet needs for temporary accommodation in the borough.