

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

STATEMENT OF COMMON GROUND - DRAFT

LPA REF: 2025/0074

CONTACTS

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LONDON BOROUGH OF WANDSWORTH

1.0 INTRODUCTION

- 1.1 This Statement of Common Ground ("SoCG") is prepared jointly by the Appellant and the London Borough of Wandsworth ("the Council") in connection with the appeal against the Council's failure to determine planning application ref. 2025/0074.
- 1.2 The purpose of the SoCG is to identify areas of agreement and matters in dispute to assist the Inspector in the fair and efficient determination of the appeal.

2.0 SITE AND SURROUNDINGS

- 2.1 The appeal site is 1.59 ha in extent, lying adjacent to Richmond Park, within the Alton Conservation Area.
- 2.2 The Site comprises:
- Mount Clare House (Grade I listed, unaffected by the appeal proposals).
 - Picasso House (1960s block with former ancillary/student uses).
 - Five accommodation clusters (Blocks A–E) providing c.180 rooms.
 - Bungalow and other small outbuildings.
 - Mount Clare Temple (Grade II* listed, unaffected by the appeal proposals).

3.0 PLANNING HISTORY

- 3.1 The relevant planning history is set out fully at section 2 of the Appeal Statement of Case. The summary of planning history is factually correct, including refusal of LDC application (2024/2089), and dismissal of subsequent appeal (PINS Ref: 3358768, 11 July 2025).
- 3.2 The parties are not agreed on the lawful planning use of the Site. The Appellant maintains it is hostel accommodation under deemed consent. The Council considers the lawful use has been extinguished/evolved into a mixed-use planning unit.

4.0 DESCRIPTION OF DEVELOPMENT

- 4.1 The application was validated on 8 April 2025 as "Use as hostel accommodation (Sui Generis) with associated landscaping and cycle parking."
- 4.2 The Appellant consider that the description is appropriate and any operational details may be secured by condition. The Council's position is that the description should reflect alleged mixed-use baseline and specify "change of use."

5.0 THE PROPOSED DEVELOPMENT

- 5.1 The proposal seeks to refurbish existing accommodation blocks, convert Picasso House, and bring the bungalow back into use, delivering 207 units / 264 bedrooms. Associated landscaping, cycle parking (106 spaces), refuse storage and play space is also proposed. No works are proposed to Mount Clare House or Temple.
- 5.2 The Parties agree on the quantum of accommodation and scope of physical works. and that no listed building works form part of this appeal.

6.0 PLANNING POLICY CONTEXT

- 6.1 The Parties agree that the development plan comprises the Wandsworth Local Plan (2023), the London Plan (2021), and the NPPF (2024).

7.0 MATTERS AGREED

- 7.1 The Site is previously developed land. There is an acute and evidenced need for temporary accommodation in Wandsworth. The proposed scheme would reuse vacant buildings in poor condition. The development would provide significant planning benefits through the provision of much needed accommodation and reuse of redundant buildings.
- 7.2 There is no proposed increase in built footprint; scale and massing unchanged.
- 7.3 Heritage impacts to Alton Conservation Area and listed buildings are “less than substantial.”
- 7.4 Fire safety, landscaping, transport, and sustainability matters could be addressed by appropriately worded planning conditions.
- 7.5 Cycle parking provision of no less than 106 spaces is acceptable in principle.

8.0 MATTERS NOT AGREED

- 8.1 The Appellant asserts that the lawful use of the Site is an extant hostel use. The Council asserts mixed-use/student baseline.
- 8.2 With regard to the principle of development, the Appellant contests that there is no demand for student accommodation and that the lawful loss is justified under LP28. There is an acute need for temporary housing.
- 8.3 The Council contest that the loss of student housing is contrary to LP28/H15 and that insufficient evidence of alternative demand has been provided.

- 8.4 With regard to accessibility/transport, the Council argues that PTAL 1b/2 is too low to support the proposed use. The Appellant argues accessibility is adequate in practice.
- 8.5 Regarding the quality of the proposed accommodation, the Council argues that HMO standards apply and communal space proposed are limited. The Appellant contests that standards are exceeded and neither HMO nor NDSS standards are applicable to the hostel use proposed.
- 8.6 In respect of operational management considerations, the Council questions staffing, security, and welfare provision, however the Appellant contends that a robust management plan would be in place and that details can be secured by way of an enforceable planning condition.
- 8.7 The Council contest that some matters require further clarification, namely, the final landscaping strategy and external amenity provision; energy/sustainability measures; and fire safety strategy. The LPA and Appellant contest whether these aspects can be further secured by conditions.
- 8.8 Draft Conditions. Without prejudice to either party's case, both agree that standard conditions covering landscaping, transport, waste, fire safety, and management could be imposed if permission is granted. No planning obligations are currently proposed but may be explored further if requested by the Inspector.