

Appendices to the Proof of Evidence of Siri Thafvelin

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Appendix A

Inspector's Decision in the Certificate of Lawfulness Appeal – 11 July 2025



Appeal Decision

Inquiry held on 20-23, 27 May and 19 June 2025

Site visit made on 27 May

by M Bale BA (Hons) MA MRTPI

an Inspector appointed by the Secretary of State

Decision date: 11 July 2025

Appeal Ref: APP/H5960/X/25/3358768

Mount Clare Campus, Minstead Gardens, Roehampton Gate, London SW15 4EE

- The appeal is made under section 195 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant a certificate of lawful use or development.
- The appeal is made by NTA Planning LLP against the decision of the Council of the London Borough of Wandsworth.
- The application ref 2024/2089, dated 13 June 2024, was refused by notice dated 22 October 2024.
- The application was made under section 192(1)(a) of the Town and Country Planning Act 1990 (as amended).
- The use for which a certificate of lawful use or development is sought is for temporary accommodation.

Decision

1. The appeal is dismissed.

Applications for costs

2. Applications for costs have been made by the Council of the London Borough of Wandsworth ("the Council") against NTA Planning LLP ("the appellant"), and by the appellant against the Council. These applications will be the subject of later Decisions.

Preliminary Matters

3. The Inquiry sat for 6 days in person. All evidence was given on affirmation. Closing submissions were presented in writing only.
4. The description of the use for which a certificate of proposed lawful use or development ("LDC") is sought (hereafter, for convenience, "the proposed use") was the subject of some considerable discussion at the Inquiry. The application form describes the use simply as 'Sui Generis – Hostel'. The covering letter, referred to in the application form adds further information, referring to a proposed use as 'temporary housing' for the purposes of providing temporary accommodation for people on a Council's emergency list.
5. The covering letter makes frequent reference to hostel accommodation, but this is mainly in the context of that being the appellant's position of the existing lawful use. It is suggested therein that the proposed use as 'temporary accommodation' would fall within that use.
6. During the Inquiry, the Council put the position that 'temporary accommodation' was too wide a description, because it could encompass a great many things and could take place in a variety of buildings including hotels, hostels, houses in

multiple occupation, and dwellinghouses. Despite having agreed on the first day of the inquiry that the use could be described as temporary accommodation, the appellant laboured the point that the proposal was for a hostel, partly because of their belief that the building already was a hostel and that was not changing.

7. Following the first day clarification of use, the Council claimed that injustice would arise if I were to make a decision on anything other than a use described simply as 'temporary accommodation'. However, while narrowing the use in this way would limit one of the Council's reasons for denying an LDC – in essence, that the proposed use was too wide to be pronounced lawful – injustice would not arise if I were to do so:
8. While the covering letter makes a clear proposal for temporary accommodation, it is also abundantly clear on the application form that a certificate is sought for a hostel use. Thus, the application documents together provide a clear picture of what is proposed. Moreover, the oral evidence did cover the potential for different forms of temporary accommodation and for different types of hostel. Accordingly, the use for which an LDC is sought can be more precisely described as 'hostel for temporary accommodation', without causing injustice. I have considered the appeal on that basis.
9. Therefore, even if temporary accommodation could be provided in a multitude of residential settings, it would be clear what was being certified on any certificate. If the appeal were successful, despite the various theoretical room layouts shown, I also see no reason why the site operator would be able to lawfully provide dwellinghouses, houses in multiple occupation, or some other form of accommodation. In the event that the site was not operated as a hostel, whether that was as a consequence of the tenure, management arrangements, building layout, provision (or not) of communal facilities, or any other factor, the Council would be able to serve an enforcement notice if it appeared to them that there had been a breach of planning control.

Reasons

10. Mount Clare Campus ("the Site") includes a number of buildings. Mount Clare House is a Grade I listed building that once stood in extensive grounds. Around it are 15 almost identical accommodation blocks in 5 groups of 3, each with 12 bedrooms arranged over two floors, shared bathroom and kitchen facilities. There are garages, a separately listed 'temple' and a very dilapidated house.
11. There is also Picasso House, a large 3 storey building. The lowest, subterranean floor includes small storage spaces, a plant room and workshop. The ground floor contains various large rooms, and the first floor is a series of accommodation units of varying numbers of bedrooms, each with shared bathrooms and kitchens within the units. The accommodation units are accessed via external stairs and an uncovered walkway between the units.
12. Collectively, all of the above sits within landscaped grounds with a single vehicular point of access from Minstead Gardens that passes the front of Mount Clare House. There is agreement between the main parties that the entire Site should currently be deemed one single planning unit.
13. Other than Mount Clare House and the Temple, the Site is believed to have been developed in the 1960s to provide accommodation for Garnett College that was

relocating from elsewhere in London. Hereafter, it is this, 20th Century development to which I refer when describing development of the Site. There are no planning permission documents, but various contemporary reports describe the then proposed and actual development of the Site alongside a nearby site at Downshire House.

14. The documents describe the Site and the Downshire House sites together in the context of developing a training college with accommodation. The teaching space was to be provided at Downshire House and the accommodation at the Site. It appears that Mount Clare House was to be used for student common rooms and the like and, from post construction reports, this appears to be what happened.
15. Despite their dual consideration, linked purpose and single end user, however, it is clear that two separate uses were proposed for the two sites. While the accommodation at the Site was clearly intended to be used in conjunction with the teaching at Downshire House, the Mount Clare site as a whole had an entirely different purpose. There is no particular evidence of teaching activities taking place at the Site, the whole being laid out and arranged for living. Moreover, there is a report indicating that the surrounding area was 'zoned' for residential uses at the time and that the educational proposals for the Downshire House site would conflict with that, whereas the accommodation proposals for the Site would not.
16. The Mount Clare and Downshire sites are around half a mile apart, with intervening uses (which may have been parkland, or may have included residential units depending on when the wider, surrounding, Alton Estate was laid out). Given this separation, and the clearly distinct activities at each location, I find it more likely than not that the Site and the Downshire House site should be treated as two separate planning units from their outset, even if they were subject to some form of single consenting process.
17. It is unclear how permission was given for development of the Site, or indeed the rest of the surrounding Alton Estate. The simple absence of historic documents is insufficient to confirm that there was some sort of deemed consent given. This is because it seems probable that, even in that scenario, there would have been some final sign off procedure and at least some document saying that the development could proceed. In any event, the actual permitting route is of little importance because the documents are absent, so to understand what may have been permitted, it is necessary to make inferences from the available reports and documents.
18. There are a number of architectural drawings showing the layout of the Site and it seems that that development now at the Site accords with them. They appear to be typical planning layout drawings and so are a good indication of what was being proposed and, probably, was ultimately permitted.
19. The 15 almost identical accommodation blocks are described on the drawings as 'Hostel Units'. Picasso House is described as 'Staff & Dining Block' and the, now dilapidated, bungalow as 'Principal's Residence'. It is primarily on the back of this that the appellant contends the 15 blocks were permitted for use as a hostel without restriction.
20. It is uncontroversial that the term 'hostel' is not a term of art, as per *Commercial and Residential Property Development Co. Ltd v Secretary of State for the Environment & Another* [1981] 80 LGR 443. Indeed, as per *Ipswich BC v Fairview*

Hotels (Ipswich Ltd) [2022] EWHC 2868 (KB), the appellant accepts the Council's proposition that there are, in fact, a 'spectrum of hostel uses'.

21. Hostels can, therefore, accommodate various 'classes' of people and, as considered in *Commercial and Residential Property*, that is frequently defined with an additional adjective – student hostel, nurses' hostel, youth hostel, for example. In present times, descriptions such as 'student hostel' are somewhat out of fashion being more usually referred to as student accommodation. Nevertheless, Miss Cooley, for the appellant, explained that, from the 1940s, hostels were created to provide affordable accommodation for working aged people. It is, likely, therefore, that the term hostel was in common parlance when the development was originally considered and would have been deemed an appropriate term to describe the accommodation proposed.
22. *Commercial and Residential Property* acknowledges a situation that a hostel without a qualifying adjective could potentially be used by any class of person, for any length of stay. The question is whether the 'Hostel Units' on the drawings for the development of the Site are such unrestricted units.
23. The historic record includes a number of reports and documents. In the main, they discuss the Mount Clare and Downshire House sites together, and in that context it is clear that, while no educational activities were to take place at Mount Clare, the development was intended to provide accommodation for students, alongside the teaching facilities at Downshire House.
24. Mr Sahota, for the appellant, suggested that greater weight should be given to planning documents. He said that he considered these to be those with a specific reference to Town Planning, such as a Town Planning Committee report, or the drawings that appeared to be planning drawings. That was because other documents, such as those speaking about education or funding might use terms more freely.
25. Of these, a report of 19 February 1959 by the London County Council ("LCC") architect to an education and Town Planning sub-committee referred to development for hostel purposes. However, even in that planning report, terms are used somewhat freely and later the report refers to the provision of accommodation for 240 students 'in the halls of residence', and clearly describes the second element of the proposal as being for the provision of 'hostel accommodation for training college students'. The ultimate recommendation was (so far as relevant) to approve plans for 'training college and students' hostel purposes'.
26. On 9 March 1959, a LCC Town Planning Committee minute notes that outline proposals for the development of Downshire House and Mount Clare for training college and students' hostel purposes were approved. On 16 May 1960 the LCC Town Planning Committee minutes record a recommendation for approval of a scheme for a training college and hall of residence.
27. It appears that the Council of the London Borough of Wandsworth's ("WBC") Town Planning Committee were consulted on the proposals on 8 July 1960. A report to that committee contains un-headed columns that generate some uncertainty over the meaning of their contents, but the subsequent report referred simply to hostel buildings. However, it appears that LCC were responsible for the decision-making process, and their documents refer to halls of residence or student hostels. In any

event the WBC report was describing a training college and ancillary buildings with the proposals for the two sites related to one another.

28. Thus, the terms used by LCC – notably including the minute recording approval of the outline proposals – consistently refer to either a student hostel or student accommodation. It is that description rather than a label on the plan that is more likely to define the scope of any permission or deemed consent given. While, where a broad use is permitted, it is usually necessary to place any restriction on that use with planning conditions (and there is no evidence of any in this case), it has not been shown that such should apply where, like here, a clearly qualified *sui generis* use is involved.
29. It is relatively uncontentious that the evidence then appears to indicate that the development was carried out, the Site was occupied as accommodation for Garnett College, and this continued for a period of time. Therefore, in the absence of any actual record of the permission or consent sought or given, I find it more likely than not that the development of the Site was permitted for a student hostel rather than an unqualified one.
30. The only available evidence suggests that there was some associated staff accommodation on the first floor of Picasso House, with ancillary communal facilities/common rooms provided in Mount Clare House and the ground floor of Picasso House.
31. It is then understood that the Site was sold to the Battersea Churches and Chelsea Housing Trust and there is no substantive evidence as to their use of the site. However, there is nothing to suggest that it moved away from the previous use by Garnett College, particularly as the 15 accommodation blocks have subsequently been used for student accommodation by the University of Roehampton, whose main campus is within walking distance of the Site. That was, in effect, a resumption or continuation of the previous known use.
32. However, there is very little clarity over what the University of Roehampton were doing on the rest of the Site. Residents of the accommodation blocks would probably have needed some communal facilities, such as a laundry and, potentially, some form of common room. Signage remaining within Picasso House is indicative of such past uses.
33. At the Inquiry, there was some discussion as to the Picasso House basement uses. There are some small spaces and a plant room as well as a workshop. The workshop contained work benches, saws, drills, and other tools. Given its small size, the appellant's suggestion that it could be used entirely in the maintenance of the Site is a reasonable one.
34. However, a 2014 photograph from the London Parks and Gardens website shows a totem sign to the front of Mount Clare House. Care should be taken when relying on a single photograph of the outside of the building at one snapshot in time. Nevertheless, the sign appears to announce the occupation of Mount Clare House by the University of Roehampton Department of Property & Facilities Management. It describes a meeting room on the lower ground floor, alongside the environment team. On the ground floor, the conferencing & hospitality team, accommodation office and finance team are listed. On the first floor a visitor reception, university head of security, projects team, university domestic services

and university ground & waste management team, as well as another, illegible, team are listed.

35. The names of the various teams on the sign are of a type often aligned with administrative functions. The sign supports Mr Curtin's description of Mount Clare House as having evidence of a previous office use. It also aligns with local resident Mr Mills' recollection of visiting a former lecturer of his, now involved in what he described as the 'greening of the university', in an office there, and Mr Sahota's understanding that there were once administrative functions there.
36. The University of Roehampton may have very many buildings available to house its administrative functions. However, Mount Clare House would have been one such building at its disposal, able to house a department with specific responsibilities. There is no substantive evidence from the University of Roehampton about how they used the site and Mr Sahota confirmed that he has not asked them about their use. The university's own letter of 13 March 2025 makes no detailed reference to Mount Clare House or Picasso House and blandly states that 'the buildings at Mount Clare have been used for a number of purposes over the years in addition to student accommodation'. No further detail is given.
37. While some functions may have related to activity at the Site, it seems rather unlikely that whole teams of the type described would be needed to provide support ancillary only to the accommodation blocks, or related to works only at the Site. Indeed, while he did not know how the office space had been used, or whether it would have been ancillary to the accommodation blocks, Mr Curtin confirmed that he had not needed to provide space for such facilities in other student accommodation projects with which he had been involved.
38. At the site visit, it was evident that large parts of the ground floor of Picasso House also appear to be in use for storage. Some of the items appear to be kitchen appliances and the like that may well be for use in the ongoing refurbishment of the accommodation blocks at the Site. Other items appear to include university-branded paraphernalia relating to the control of Covid-19 that could have been used in connection with the accommodation units at the Site, or elsewhere. However, other parts are laid out as filing rooms (labelled as University of Roehampton storage) and there is no substantive evidence about what this relates to.
39. In addition, one corner of Picasso House has been refurbished and laid out as office/consultation space for the Citizens' Advice Bureau ("CAB"). Google Street View photographs show that it has been at the site since 2019 and there is no particular evidence that it was an ancillary support service specifically for the residents of the accommodation units at the Site. Indeed, there is currently no residential occupation of the site and the CAB office use has clearly continued beyond vacation of the accommodation blocks, given that it was open and operating at the time of my site visit.
40. I note here that very little is known about the principal's residence that is described in some early reports and shown on the plans of the development. Evidently, something was built in broadly that location, but the present-day remains are barely recognisable as a dwelling. At some point – seemingly, from the condition of the building, some time ago – it ceased to be used such that it would not be contributing to the overall use of the planning unit.

41. With regard to the above, I conclude that the evidence makes it more likely than not that during the University of Roehampton's occupation, uses have been brought onto the Site that are related to wider university functions (both the office uses of Mount Clare House and storage uses of Picasso House), and also to private business operations (CAB) within Picasso House.
42. At this time, those spaces ceased to be used for purposes ancillary to the accommodation units. While the overall spaces/numbers of rooms in these other uses are relatively small compared to the available floorspace on the Site as a whole, these are disconnected uses. Thus, even if the uses have not continued for long enough to have become lawful in their own right, I find it more likely than not that this caused a material change of use of the Site to a mixed use including student accommodation, storage, and office uses.
43. The appellant has no clear proposals for Mount Clare House. Its Grade I listed status makes it unsuitable for modification, and its layout does not lend itself to providing temporary accommodation. Communal facilities, such as catering and laundry, or ancillary support services may well be provided within Picasso House as part of a hostel accommodation offer. However, as per the application for the whole Site, the certificate is requesting confirmation that a single use would be lawful. That would be materially different to the current mixed use ongoing at the site in recent years.
44. In any event, I have considered whether the proposed use as a hostel for temporary accommodation is materially different to use of the Site for student accommodation.
45. There are likely to be some similarities in the way that the buildings are occupied. They include that rooms would be occupied by unconnected individuals, sharing any communal facilities provided, and they would likely occupy those rooms on licence rather than a tenancy agreement. Lengths of occupation may vary considerably, but the University of Roehampton has confirmed that most students were offered licences of 39-51 weeks. There also seems to have been some short-term letting for other commercial purposes if rooms were available, although the extent of this is uncertain.
46. Historically, Garnett College may have run courses of varying lengths with several different cohorts, differing from the conventional undergraduate pattern. The accommodation could have been occupied by mature or post-graduate students, as it probably was when used by Garnett College. The demographic profiles of University of Roehampton students may be broadly comparable to those presenting as homeless. While the appellant's evidence suggests that there could be improvements in noise and disturbance effects with the proposed use, Mr Mills' evidence is that he has not recalled any such problems from the existing use of the site, so the uses are likely to be comparable in that regard.
47. Mr Curtin's evidence suggests one possible solution for refurbishment of the accommodation. It shows en-suite bathrooms and kitchenettes being provided within the individual rooms, leading to a greater degree of self-containment. However, that is probably no different to some modern student accommodation and would, thus, be a consequence of refurbishment rather than a change of use. Likewise, an alteration of existing shared kitchen and bathroom spaces into bedroom spaces and resulting increase in occupancy could equally occur in the

existing use. Miss Cooley explained how required rooms layouts and facilities would be broadly comparable for existing and proposed users.

48. While general statistics reveal that homeless people have higher levels of disability and chronic healthcare needs, Miss Cooley explained that this is skewed by the inclusion of the long-term or entrenched homeless. Given her experience, I have no reason to doubt her position that these are not the types of people likely to be accepted into temporary accommodation. Although the proposed occupiers are not tightly defined, her position that hostels providing temporary accommodation are likely to accommodate a wide range of people from across the social spectrum is credible. As the buildings at the Site are unsuited to a large number of physically disabled people, there is no reason why there should be a material difference in the general healthcare requirements of previous and proposed occupants.
49. Both parties instructed transport experts to assess whether the change of use would have a material effect on the highway network. Conventional analysis of trip generation has been challenging, because the commonly used TRICS database does not cover hostels providing temporary accommodation. Data for sites that may contain similar uses, such as local authority flats, are from surveys in incomparable locations. Available data for student accommodation also relates to sites with different accessibility credentials and parking levels. While consideration of whether this results in over- or under-estimates can be made, I find that TRICS analysis is a wholly unreliable method on which to compare likely trip generation of the two uses at this site.
50. Both parties also attempted to compare likely parking demand. This is also an imperfect exercise because the census data underpinning car ownership information groups various categories of accommodation together. For the appellant, Mr Lewis believes that both uses should fall within the same category and he, therefore, anticipates that there would be an increase in car ownership based only on an increase in available rooms.
51. For the Council, Mr Marshall has also accounted for the increase in room numbers. However, he has also applied a weighting to his figures. That is based on the number of equivalent housing units that student accommodation and communal housing solutions are expected to provide to general housing land supply. While a novel approach, I can see that this might be instructive of the number of people likely to occupy the units, when compared to dwellinghouses. However, as there is no substantive evidence about relative car ownership patterns between dwellinghouses and student or communally occupied units, it has not been shown that the weighting would be accurate.
52. Moreover, the weighting has not been applied to dwellinghouses. Rather it has been applied to data for flats containing one person aged 17 or over. In both existing and proposed scenarios the accommodation would, in effect, be providing accommodation for a single person. While both student accommodation and temporary accommodation for the homeless might operate differently to flats falling within Class C3 of the Town and Country Planning (Use Classes) Order 1987 (as amended), they may already be a part of the chosen data set (in the absence of a more suitable one within the census data). It is not clear, therefore, why that data set would need to be weighted in the way that it has been.

53. Ultimately, the evidence base supporting the weighting is poor and so the results may be unreliable. I favour Mr Lewis' approach of using the same data set for both, especially as that accords with Miss Cooley and Mr Sahota's experience that those in temporary accommodation would usually have low levels of car ownership. Any uplift in car ownership would, therefore, be dependent on the ultimate refurbishment proposals of the accommodation. The change of use itself would cause no material change.
54. In any event, car ownership can only be a proxy for potential private vehicular trip generation. In the absence of a reliable comparison methodology for other modes, far more instructive of any difference between uses would be a qualitative analysis of the behaviour of the occupants.
55. Students resident at the site would have shared a common endeavour in their academic studies. They would, in the main, travel most frequently to the university campus where there are a range of educational, social and wellbeing facilities available to them. However, while residents in the proposed use might have a variety of endeavours spread across a wider area of London, this accommodation is detached from the university campus and, therefore, in existing and proposed scenarios, residents would generally be leaving and returning to the accommodation individually or in small groups at various times throughout the day.
56. The University of Roehampton has confirmed that many of its students are engaged in part time work. They may also attend work placements and internships elsewhere in London. As such, although their main reason for living at the site would be education, they could reasonably be expected to place other travel demands on the road network and public transport. The lack of shared endeavour, therefore, would not create a material difference in the way that the site was used.
57. However, while students are likely to place some reliance on local shopping and leisure facilities, they would also have access to the university-based facilities. The Council has suggested that their social activities are likely to revolve around the university and its facilities. By contrast those who find themselves in the proposed temporary accommodation could have existing social commitments elsewhere and would only use facilities for the general population.
58. The appellant's witnesses sought to downplay this, partly on the basis that there are a number of local services and facilities closer to the site than the university campus that could be used by students. But, while the University of Roehampton has indicated that its students can, and probably did use these facilities, and were said to be well integrated into the community, there is no substantive evidence as to the extent that they do (or did) when residing at the Site.
59. The University of Roehampton provides a students' medical centre that is serviced by a local GP practice. On that basis, it is likely that the demand on doctor time would be indifferent, as patients would just be seen in a different place by the same healthcare professionals. However, there is no obvious reason why, for example, students would use other nearby community services such as libraries, community centres, employment centres, adult education centres and the like, to anywhere near the same extent as residents unconnected with a university, as comparable university facilities are likely to be far more suited to students' needs. Whether or not those local facilities have capacity to accommodate additional

pressure, the presence of extra demand and differences in occupants' need for them is materially different in this regard.

60. Some of the rooms at the Site are large enough to be shared by two people. However, there is nothing to suggest that through its time providing accommodation for students they were not, in the main, occupied by single people. Although some mature students might have children, there is nothing to suggest that children have previously been accommodated at the Site. In the proposed use, the room sizes would not change and they would continue to be most suitable for single occupancy. Nevertheless, Mr Curtin's suggested room layout could include some two-room units. While I appreciate that such is hypothetical and not indicative of a final proposal, such rooms might be capable of providing accommodation for adults with one or two children.
61. Miss Cooley confirmed that particular care is required when accommodating children for safeguarding reasons and it was unlikely that they would be placed in a hostel with other adults. However, she also acknowledged that, given the dispersed buildings at the Site, some could be assigned for different categories of people. While it is not currently the appellant's intention, such may change and it seems likely, therefore, that the proposed use could reasonably accommodate some children in the future, should demand dictate. In addition to other community facilities and services, this would place new demands on schools, parks and other children's services.
62. Furthermore, while the accommodation at the Site may have been occupied for various periods and, to some extent, throughout the year, the nature of student accommodation is that it is most likely to have been occupied by a succession of cohorts for consistent periods of time. Thus, the vast majority would likely arrive and depart together. That is contrasted with the, materially different, uncoordinated individual arrivals and departures of temporary accommodation residents. Miss Cooley's position that tenure or licencing arrangements would not dictate this behaviour does not change this probable behaviour pattern of most people.
63. Therefore, even in a scenario where a mixed use of the site had not been instituted, the use as a hostel for temporary accommodation would result in a material change of use of the Site. In any event, the change from a mixed use to the single use described certainly is. The making of a material change of use is development requiring planning permission and none has been obtained. The proposed use would not, therefore be lawful.
64. For the reasons given above, I conclude that the Council's refusal to grant a certificate of lawful use or development for use of the Site as a hostel for temporary accommodation is well-founded and that the appeal should fail. I will exercise accordingly the powers transferred to me in section 195(3) of the 1990 Act (as amended).

M Bale

INSPECTOR

APPEARANCES

FOR THE APPELLANT:

Andrew Gillick BSc MBs MSc

He called

Anna Cooley¹

Daniel Curtin BSc (hons) M Arch Dip Arch ARB RIBA

David Lewis MSc MCIHT

Mandip Sahota BA DipTP MRTPI

FOR THE COUNCIL:

Victoria Hutton, Counsel for the Council

She called

Will Marshall BA MA MSc

Siri Thafvelin BA MA AssocRTPI

INTERESTED PARTIES:

Mark Doody (local resident)

George Mills (Chair of Swaythling House Residents Association)

¹ Anna Cooley has various relevant qualifications, but the manner in which they should be cited is not clear from her proof of evidence.

DOCUMENTS SUBMITTED TO THE INQUIRY

ID1	Extracts from Homelessness live tables at 06 May 2025
ID2	Extracts from University of Roehampton website at 30 April 2025.
ID3	Wandsworth Homelessness Health Needs Assessment 2023
ID4	Technical housing standards – nationally described space standard 2015
ID5	Opening statement on behalf of the appellant
ID6	Opening submissions on behalf of the Council
ID7	Copy of Mr Doody's oral submission to the Inquiry
ID8	Site visit route plan
ID9	Closing submissions on behalf of London Borough of Wandsworth
ID10	Closing statement on behalf of the appellant
ID11	Response to additional case-law on behalf of London Borough of Wandsworth
ID12	Appellant response to the Council's response to additional caselaw
ID13	Costs application on behalf of London Borough of Wandsworth
ID14	Application for costs on behalf of appellant
ID15	Response to [appellant's] costs application on behalf of London Borough of Wandsworth
ID16	Appellant's response to Council application for costs
ID17	Reply to the appellant's response to the [Council's] costs application on behalf of London Borough of Wandsworth
ID18	Appellant's final comments on the application for costs

Appendix B

Appendix A to Proof of Evidence – Siri Thafvelin – 22 April 2025



Appendix C

Order of David Elvin KC sitting as a Deputy High Court Judge – 28 November 2025



**In the High Court of Justice
King's Bench Division
Planning Court**

AC-2025-LON-062443



In the matter of an application for statutory judicial review

AKA CAPABILITY LLP

AC-2025-LON-002743

-and-

**(1) SECRETARY OF STATE FOR HOUSING,
COMMUNITIES AND LOCAL GOVERNMENT
(2) LONDON BOROUGH OF WANDSWORTH**

Defendants

**Notification of the Judge's decision on the application to amend by the
Claimant and for permission to apply for statutory judicial review (CPR
54.11, 54.12)**

Following consideration of the documents lodged by the Claimant and the Acknowledgements of Service filed by First and Second Defendants

ORDER by David Elvin KC sitting as a Deputy High Court Judge

1. The application for permission to file the extended reply is granted.
2. The application for permission to apply for statutory review is refused.
3. The costs of preparing the Acknowledgements of Service are to be paid by the Claimant to:
 - a. the First Defendant, summarily assessed in the sum of £6,673.20; and
 - b. the Second Defendant, summarily assessed in the sum of £14,014.75.

Reasons

1. I consider the application to be unarguable, in substance for the reasons set out both Defendants' summary grounds. I note that submissions have been made as to the extent to which some of the matters now raised by the Claimant were raised and were controversial issues before the Inspector or, indeed, were not matters of dispute. See *Mead Realisations v Secretary of State* [2024] PTSR 1093 at [179]-[182] (not disturbed by the Court of Appeal judgment). I have considered the grounds apart from that complaint and find them to be unarguable in any event. If they had not been raised as controversial issues this would only strengthen that conclusion.
2. On the first ground, *Young v Secretary of State* [1983] 2 AC 662 does not permit the reversion to a prior lawful use if it has been lost by an intervening unlawful material of change of use. The Inspector found there to have been such a material change of use which superseded the lawful use as a student hostel. See Lord Fraser at p. 669-671. A grant of permission at some stage in the past does not survive as an extant right once it is spent following a subsequent material change of use and to revert to it requires the grant of planning permission: *Cynon*

Valley BC v Secretary of State for Wales (1987) 53 P&CR 68. This principle is not affected by the principle permission inures for the benefit of the land (**Pioneer Aggregates**) since that does not deal with the case where it is superseded by a subsequent development.

3. On this question of law, there was no failure in the Inspector's reasoning given his conclusions on the issue at DL 41-43. He did not need to do more than state the outcome of his assessment of whether there had been a material change of use, which he did having explained why he reached that conclusion. I do not find his reasons for his conclusion as to the material change of use to be even arguably inadequate.
4. Ground 2 fails since it is parasitic on success on Ground 1. However, this involves an attack on the planning judgment of the Inspector and I would have found these grounds unarguable for the reasons advanced by the Defendants.
5. I have awarded costs for the AOSs on the usual basis. Although the Second Defendant's costs may seem a little high, this is justified by the very lengthy statement of facts and grounds and reply and the raising of in some instances issues that were not controversial before the Inspector.

Signed David Elvin KC

Dated 28.11.25

The date of service of this order is calculated from the date in the section below

For completion by the Administrative Court Office

Sent / Handed to

either the Claimant, and the Defendant [and the Interested Party]
or the Claimant's, and the Defendant's [and the Interested Party's] solicitors

Date: **1st December 2025**

Solicitors:

Ref No.

Notes for the Claimant

If you request the decision to be reconsidered at a hearing in open court under CPR 54.12, you must complete and serve the enclosed Form 86B within 7 days of the service of this order.

A fee is payable on submission of Form 86B. **For details of the current fee please refer to the Administrative Court fees table at**
<https://www.gov.uk/court-fees-what-they-are>

Failure to pay the fee or submit a certified application for fee remission may result in the claim being struck out.

The form to make an application for remission of a court fee can be obtained from the gov.uk website at **<https://www.gov.uk/get-help-with-court-fees>**

Appendix D

Inspector's Note of Certificate of Lawfulness Appeal Inquiry (with pagination added)

Mount Clare Inquiry – Notes

Note – delays in initial IT setup. Could not connect my laptop to the monitor provided. Took until c.09.45, by which time Council had arrived (c.9.40) slightly before appellant (just before 9.45). A few mins, therefore, while I was in the room with only the Council (and their facilities management colleagues) Once IT support had concluded, I left the room – c.9.45

Opening

Notes/IQs	LPA	Appellant
What applying for		'Temp accommodation, in the form of hostel'
	Both parties have been dealing with temp accom description - no objection to that being the application.	
Will proceed as 'temp accom' -	Need to be certain at outset	Happy
		Stance is that was granted deemed consent as unrestricted hostel use – so, fine line between temp accom and hostel use.
Unsigned socg's to be disregarded.		
Other docs – not agreed		D1 – should have been withdrawn by UoR – by email last week.
		G7 - ;3 rd attempt by C to introduce this evidence.
Re D1 – can make submissions on weight		
Re G7 (Start with C submissions, then A response, then my conc below. ... I will accept the first document	3 docs – 1 st are live tables taken from the gov stat homelessness live tables – show figures/demographic figures (prevention/relief) duty Ms Cooley has provided some limited demog info – these tables give a fuller picture – purely factual information.	Bad practice to intro new evidence at this point. It's not fair. No objection to that being submitted.
Will accept 2 nd doc.	Second set of doc – starts a PDF p 6 – printout from UoR – printouts of URLs – but didn't include printouts of appendixes. Here they are.	Mr S is checking that the documents are the same as those referenced. It is.
Will accept	3 rd doc – starts at pdf P. 35 – are Wandsworth health needs assessment from 2023 – this is relied on by A	Yes – this is referred to

	at 2.2 of Miss Cooley's evidence, but not appended. This is just the whole doc.	
Will accept.	Also 4 th doc – not in evidence yet - national space standards for 1, 2, etc. bed dwellings. Only with PoEs that A ha provided layout proposed and fact that bathrooms and kitchens – so dwellinghouses and are far below what would be expected for C3.	Not putting a case that C3 – this is pointless and a red herring.
G7 accepted – IDs 1-3		
Space standards accepted – G8 and space standards		
		Has copy of much mentioned 3020 P5 -
We can look at this in due course.		
		SV can be at any point
	Would like to SV before Mr Curtin as don't understand	Having some works done – to show what units could look like – before and after.
Don't understand this... doesn't seem a good reason		Now agree can go whenever I want.
Please agree a route		Will try
A will be making app for costs Please make in writing. Council reserves its position.		

General Q

Temporary accommodatinosufficient?		Yes
Is the C content with that descry	<p>Yes – it is proceeding on basis that it is temp accom</p> <p>But this is rextremely broad, bit thatn's not the full story -</p> <p>Temp accom could be in a dwellinghouse.</p> <p>Need to be satisfied that the whole range of uses that could come under this may be lawful</p>	<p>See correspondence from CO – what was originally proposed – too prescriptive: resolved to be temp housing as this was less prescriptive</p> <p>Happy to proceed on that basis.</p>

Evidence

Mr Doody

[handing up written copy of what he is going to say. Speaking from public gallery}

Read from doc

Mr Mills – takes oath

Chair of S House Resi assoc, overlooks campus. Have recently taken pos on alton community pannel re regen alton estate: will be paid by Council for any hours worked on that panel.

Asked to come un understanding that A saying no COU from student to hostel – We contest that. Believe will be an impact.

One reason say not the same: 15 June 1960 doc – chairman TP Cttee – speaking about financing college and accom – G3020, but also G3157, G3324, G3325 – approves plans, for MC and DH for use by Garnett Col and HoR

[Where is stipulated? (asked by Mr G)]

RAssoc believe diff between HOR and Hoselt- have lived on esated since 2009, and was student UoR 1997-2002 – students only stay for term periods – had to leave in summer; were able to be accom in larger campuses, contrary to pop belief – students don't party every night, study hard – they were quiet and never had any major disturbance.

Concerned that proposal is very vague – about what want to use it for – have not engaged with us, v. unclear what will happen – only 5 years – also very strange. Don't believe it is a hostel and concerned about they want to do, but obvs don't want to see it empty.

As student – I know was there when UoR took over from UoGreenwich – MC House was left empty for some time – students into some of the accom – by 2009, were using MC house for office accom

[what?]

In months of June, used to rent out some rooms for tennis. No major impact. We overlook site and can see it. Stand by previous submissions about likely impact.

Mr Gillick

- Docs mentioned from 1960s – what meeting?

Memo TC committee -; chaired

(VH believes this is doc 21 in A evidence – F2, p.93 – MGH confirms)

- Mr G: this is a memo, not a planning document; stamped 15 June

Shows it was used as a training college.

- Mentioned most of student's work

Now they do – in 1997 when I first went, were told better not to work, but to study. But that has now changed a lot – some work FT, because much more expensive.

Students were never partying in gardens etc – were going to uni/college and working.

- Also mentioned temp for 5 years – its not

Understand app – but just concerned.

- This property not had a negative impact so far – when occupied since 2009?

No.

- G4/G5 refer to the building as a hostel – (but no questions).

IQ

- What use was MC House put to?

Can only speak from only experience - but in 2001/2002 – mother died while was a student – was working as security over Christmas as didn't want to go home – was a security officer – no students there. Some moved in, most international.

Afterwards, moved onto estate in temp accom – 2009 – met one of previous lecturers, invited into office – was v clearly office space – was involved with greening of uni – as environmental office. Can only say 2 snapshots.

Downstairs were other offices.

Procedural note

Asked parties to agree SV. Will encompass DH. Will take 2-3 hours.

Advised that I have a retiring room – was in the corner of the planning office, but a private office and I would not be speaking with anybody.

Lunch – 12.48 -13.50

Appellant's evidence

Anna Cooley

EIC

Question	Response
Xperience	Supported ho, and soc ho proactitioner. Work for sh consultancy. Have MA relating to strat man and leadership, relating to housing 30 years of running and planning regen hostel accom.
Point 1.7,	Aspirations of AKA to deliver much needed temp accom and create high qual units for tmepl acom that would be auspices of hostel
What is homelessness/obligations under Homelessness act 1996/HR Act, what form	H is broad spectrum, general understanding that problems with abuse etc. but can affect everyone. LA must have a strat to support people out of H – underpinned by Housing Act, more

	recently HR 2017, Las to have a clear strategy to ge't people out
Legal defn	Hostel would support people to move out of Hness – not clear demog base, but shared facilities overall and needs to have provision where food can be prepared/facilities
Need to be substantial facilities	No – last 10-15 years many hostels will have ensuite and kitchnet facilities, but will have broad spectrum shared facilities
Would it have ensuite	Yes
Kitchenette	Yes, but also shared facilities overall – it is 2025, this is what we expect as facilities iwhitin a unit
3.1, understand C consider will be used as HMO	Given app put forward that will be leased to either RP, LA, Community Benefit societyprovider – would be exempt from HMO – commercial entity can own a property – as long as mgt by RP/CBS – exempt from HMO licence
Why C say HMO	It's a broad spectrum terminology, but this wouldn't be HMO given nature of what applied for
Firmly of view this is Hosetl	Yes. Absolutely
Ho Act 1985, been through that: last line – provide kitchnettes, accom will retain shared elements – looked at plans	Looked at plans, and seen internally – satisfied tht Hostel
Should a hostel have shared bathing facilities	It doesn't matter – technically can be both because have moved forward given what can be considered as a H in reality now can have shared facilities. Dividing line – comes down to tenure – because an excluded licence means you have no excluded use of any facilities – thy are not strictly your own
Ho Benefit Regs 2006 – significance?	Reaffirms Ho Act and subsequent legislation – re discharging/removing need for HMO – must be owned by registered ho assoc, and can be funded by LA/RP. By virtue of shared accom – can't be self contained.
3.14 – tenancy agreements, doe these tie in with UoR use	Would see no change re demographic/tenure used? Re managing ASB – no different to what would see ina hostel
So UoR accord with finding that v little difference in types of people	UoR – v little dif, but was a broad demographic – were working age adults. Demog show sig proportion of students in employment Demo of students with mental health issues/employment just the same as likely future occupiers
Re Garnett Co	Working age adults over a 52 week period.

	Also many students who reside in hostel accom – not just a unique entity – many students/what is considered student accom – can be described as a hostel. Materially no difference
Re I'm your Man comments by C	Pragmatic view of occupants who are dwelling. Re Ho Act and dfn' of hostel – is no demog profile. It is unreasonable to suggest that a particular demog. Should define what a hostel is. That is defined by facilities and demog offer.
Re section 6 – demog. Fairly similar re appendices	Yes – v v similar – Re proportion of occupants under 45 – Data is inequalities assessment data from LBW site – it is the data required to be submitted under HR Act – 'HClick' – Las must provide – and reason for data is that it is the most recent entire year. This really clearly mirrors info provided by UoR in removal of R6 letter.
S7 Are you comfortable that broad hostel use	– clearly no MCU – what can be considered student/hostel – length of stay, occupancy agreements, length of stay: negligible difference. Clearly indicates that no MCU.
Consented as hostel in 1960?	Yes
Students?	No – doesn't matter, no classification re demographics, in defn of hostel
LPA have raised topic of abandonment – you've gone through history – can you see a period of time when H use abandonend?	No
Appendix 1 – can you explain the picture painted? What do these graphs show	Basically show key demog of homelessness applicants to LBW. I've utilised info – provided by letter to WD R6 – just really clearly shows v little diff re C data under HClick and that provided by UoR Demog of Student and what could be Hostel is exactly the same
P15 – para above graph – run through...	Ref to sign. Portion of students in employment. Would be same in temp accom . Assumption that most would be unemployed is not correct. May be able to access Ho ben. But sig proportion would be employed; but re students, most would be in FT employment at the moment – level of demographic is exactly the same.
Last sentence of penult para	Its looking at age profice of those presenting to C – sign. Proportion were under 34 close to 40% - mirrors populous when UoR used the accom
2 nd sentence last para -	Largest were HH with Children, but there is an enormous populace that would apply for h'ness – but doesn't mean they would nec be referred to MC –

	<p>There is a plethora of accom types that could be offered to those HH – it could be single accom, flats, out of borough – doesn't mean that they would be referred to MC.</p>
Last para – what sort of people would be put in this sort of accom and how long stay?	<p>Temp accom is ordinary HH that live in communities. Not nec a % of populace that have sign.</p> <p>[for HW] ✓</p> <p>Issues.- could be a week/12 months – will be the same as hostel accom as a whole – sector av. Is 12 mth or less – would be given licence, but that could be reissued.</p>
Go to OR on Refusal: B1 – 1 st page, ¾ way down – student blocks A-E – what stands out from this para	<p>Essentially the accom is the accom. This is what would be expected in a Hostel – cluster accom. Nothing here that is not Hostel accom. Would expect ancillary facilities.</p> <p>Its ref to as student accom,</p>
But not what we applied for ? Is it a pre-meditated opinion	<p>Ho. Accom is tenure blind, ref to students is not relevant.</p>
S6 -re Fidler and E Barnet – consider a character/COU by UoR?	<p>No, because ref to what a H is – there is no MCU whatsoever.</p>
In last para – length of stay were around a year, what is your opinion on length	<p>Could be up to 12 months, but on occasion not unreasonable to say on rare occasion may be more than 12 months, but not normal. And students would also be excluded licence – and must be over 12 months</p>
Travel home for Xmas	<p>Disrespectful to people in Ho, to say no family and would not travel home</p>
Re reliance on student support services	<p>In temp accom/ho. Accom there will always been support amongst com facilities available, so no mat dif whatsoever</p>
Any evidence in any docs, students move from halls to private sector after 1 st year	<p>Maybe, but maybe also hostel for 1 year and people may move to private sector afterwards, so no diff</p>
KC opinion – oc periods the same	<p>Yes – that is the correct?</p>
In report says was occupied 20 years – renders historic use irrelevant	<p>Subjective comment – If look at characteristics that define Ho. Then look at operational use – it would completely align with ho. Accom. It does not evidence any MCU.</p>
Was it hostel 1960	<p>Yes</p>
When UoR moved in	<p>Yes Many nationally utilised as student accom, but use is classified as a hostel</p>
Section 8 – and classification on plan	<p>Diff classifications, but, inc dining block would all be considered as Ho accom. Would all be facilities would expect to see – no difference between them.</p>
Have you been	<p>Yes, I've been internal and external</p>

Next page 2 nd para – (p9) do the words ‘to be used by Garnett Co as HOR’ create a restriction/change fact granted pp as hostel	No it makes no difference at all – it would still be considered as Ho accommodation
In para 19 KC opinion – para – agree?	It is hostel accommodation
Been through all info – have you seen any glimmer of restriction	No
P11 – 3 rd para – Pic Ho reported as used for.... Are these buildings ancillary/part of hostel – after your SV what is your view – MC/Principles/Pic ho – what is feel of these facilities	Would be classified as hostel – in reality any of them could be used. Would not move away
Last para p 11 – have you read covering letter from NTA – aware of how would operate	Yes – would be offer of temp accom for theose applied to LBW
Would they be kids	Not nec? App would be working age adult Anybody could be referred or ref themselves to LBW as homeless
Operator could choose who goes there	Yes – in a placement – you need to place based on needs of appt – so if had accom base that served people who were single, but in emergency might place a child, but would try not to, and would place as nees of appt
P 12 – HMO reappiers- happy not HMO	It is a hostel – by virtue of plan for building – plan is to lease to RP or CBS – so under 2004 itteration of Ho Act – exempt from HMO licence.
P15 – you deduce residents likely to come from dif parts of Wandsworth	On the whole – generally populace could be from the locality, could be out of borough arrangements, but usually local
Cf UoR where 50% students from locality	Having done SV , pressure on local services would be exactly the same.
Re focus on additional noise/disturbance – have been to students/hostels, - which is worst negihtbour/opinion on amenity	Similar in many ways – if care to substance misuse etc, then would jexpect higher ASB – but this is temp accom, and would expect; For students, had sign. More problems with noise disturbance in my experience of portfolio management
Comments on missing 1960 DN	Re relevance, I don't have an opinion it would be a concern
Criticise KC opinion – re highly unlikely relevant conditions – says there would have been conditions – do you think there would have been	Unlikely [why] 
Last page – re material diff -disagree?	Yes -
Ultimate conc that likely conditions would have been attached to a DN – eg some recom. By WCC – any evidence pointing that way?	No
Insuff evidence that are no restrictions – do you think site is restricted?	No
Re materially diff – pp required?	Reject that – its not practical – no way it would be different.

Re WCC PoE -3.6 – been – upstairs/downstairs, what is opinion	Consistent with hostel accom – what is ancillary is what I would expect to see
Laid out as per plans you've been given	Yes
Criticised at 4.3 – do you think should be forced/criticised for not putting a tight descry/use restriction	No, it would not be useful re premises as a whole – would be unreasonable to ask you to
Do you think in 1960 had broad use, and should remain having broad use	Yes because would meet needs of LA
5.48 You've read all docs/info. Now we have a new concept – by 2001 sites split – have you seen anything that captures DH and MC in same management/use/planning/docs	No
So nothing to indicate were ever the same	No not in my opinion
Was there any academic uses on MC?	Not to my kn. Actual use of MC was meeting req. of accom
Use of MC was resi?	Yes
[don't lead your witness]	
5.50 – raises topic of abandonment – and creates new planning chapter from 2001 – was there abandonment?	Not a pl. expert, but has continued from 1960 with no abandonment or change.
5.57 – disagree with that statement?	Would say use is hostel – and always has been.
So you'd disagree?	Yes
5.60 – re SoCG/30 – have you read that letter?	No not sure I have
F2, p 118 – 3 rd para – what does this letter tell you of the understanding of the use in 1989?	Only just read this – but tells me this site was used for many diff types of accommodation -
So back in 1989, could bedsit accom also be called hostel?	Yes
Would hostel be bedsit	As long as shared facilities could be considered hostel -
In 1989 – did council think this was Ho accom	Can't say what they think ,but would seem to give option of hostel accom
For working age adults	Seems to be what suggested
5.66 (ST proof) – do you think Garnett arrived before/after pp	Would say it's not relevant – it was there for use by working age adults – it was available.
We will be a hostel under 9185 act?	Yes
Caselaw at 6.13 – MCU – is this comparable	No because not looking at self contained flats – but as expected in modern Ho accom – own kitchenets and ensuite
6.16 – doc - appendix E – what hostel use could be a homeless hostel – what is eluded here – eg phys characteristics/ bed spaces/age groups/support offer/management/length of stay	All completely different. Some of the descr. Made are support accom – much higher level – so wouldn't ref. the accom available for MC – would be Hostel, but usu. Regulated activity (eg. Social care), or not – eg. More generalistic as proposed
6.18 – HMO aain – any of it relevant? 3. 6.21 – licence	No it wouldn't because plan is to lease site to RP / LA – renders it exempt.

	Assumption that Ho. Has fixed no. units – it doesn't – can be eg 5-270 units. Can't classify in that way.
Burdle: been to site/analysed planning etc – comes down to primary use of site. Are you convinced that this is grouped together with DH	Its an individual site providing accom
MC – 15 units hostel?	Yes
Pic house – hostel	Reasonable to say so
MC House -	If considering ho accom – those elements are considered as a whole. Because it is what is deemed nec to deliver Ho. Accom.
Back 6.37 – not ancillary? Agree?	Ref. to student is irrelevant. Because tenure blind
6.42 – narrowing or widening – Would potentially Embrace much wider use. Do you think LDC requesting widens the use could put to	No, it would be exactly the same.
Table 1 – think it came from original UoR letter – now superseded – taking headings – is it similar/dissimilar	Similar
Household size	
Age group	Broadly similar
Place of resi – main/secondary [didn't ask if similar] ✓	Would be usu main residence, unless, eg. Fleeing domestic abuse
Length of occupation	Similar
Facilities	Similar
Common endeavour, bearing in mind UoR letter said everyone at this location wasn't actually going (in WD R 6 letter – last sentence said not nec UoR – has made available to other students)	similar
Wider facilities	Sim
Payment	Similar
Mgt	Similar
6.45 – age profile?	Think it would be broadly the same.
6.47 – re removal of principals house. Agree would remove this, or is this accom either Ho. Or ancillary	Subjective to say it's a DH – because in reality, any could be considered Ho. Accom.
6.51 – do you find students own cars	Not on the whole
Homeless?	Not on the whole
How do homeless/students travel	As a populace of community – will on the whole use PT/walk. Some will have cars, but not usus
Do you think travel of students v different to travel homeless?	Broadly similar because carrying out daily life
Ever heard of parking stress caused by hostel	No
WM Proof – 2.6	Doesn't actually make any sense – because demog. Likely to be similar

Ref. general HW matters – re more disabled etc? opinion?	
Occupier can choose who goes in	Absolutely because need to risk assess; and make sure they can safely accommodate. Wouldn't put disabled person somewhere they wouldn't be safe.
Table 6.1 – sense check point of view From your experience student accom/hostels – how can one be 5 times another	My opinion is that they are quite notional figures. Don't make a lot of sense re what one would expect. Big assumption that someone in SA would have less trips the HA, can't see any logic in the figures.
5.1 – 40 flats would own one car each	No, veh. Ownership is not very common
Wouldn't agree with statement 7.2 – evidence likely to be right	Not from my experience, no.
Appendix J – baseline trip generation SA - 317 – Temp A – 1004 – so every unit , every day, 4 person trips per day – do you find that these are the transport stats you say in rpev TA schemes you've done	No
Appendix Q	Does not bare relevance to TA as a whole. It's very generalised.
6.52 – neigh amenity – any grounds for any incr in noise disturbance	No it depends whose placed there and can't make a broad statement judgement
Comesdown to class of person, not way behave?	No if it is a regulated activity eg someone with particularly complex needs. That is not proposed, this is low level support accom, that would be temp
Appedix F to ST – E13 Do you think T Ho. Dwellers would have any more draw on facilities	No. Its general populous – if regulated, may have bigger draw, but that is not what is proposed here.
Policy to protect student Ho – 6.57 – pol to protect – does policy LP28 come into effect	No, because classification has never beenstudent accom.
LP29 – re Ho shared facilities – are we building a new facility with houses w/shared facilities	You are using an existing facility
Should LP29 be applied	Not a planner, but if not a new facility, then no it shouldn't.
S7.1 – agree disagree a)	Impact on educ irrelevant. Disagree
b) any evidence that for training col and resi across MC and DH	Not that seen
c) – of opinion that...	Agree it is a hostel use
UoR letter D2 Point 1 – pass comments:	Typical of all hostel accom – parameter of tenure the same
Typically grant licence to be occupied for a year	
Licence periods of 52 weeks granted to many students	Correct
Although max indiv is 51 weesk, in practice some continue through whole time at uni Etc	Exactly same – would issue excluded licence, would never have exclusive use –

	so licenced to avoid straying to land of tenure
75% BAE background	Correct
Sole place resi in UK	Yes -
Majority low income/deprived	Yes – similar to TA
Large proportion in PT work – and also heard from Mr Mr Mills – do you feel most people in TA are in emplt	Most – either vol or PT
Majority in PT work, so PT work/PT student – TA/Student massively different?	No, on the whole not.
Garnett Col – courses to those training to be lecturers. – Would that demo mirror what would be in TA -	For working age adults
Year round – Mr Mills said sometime year round	Yest this would be similar
Management – mirror original application that Mr Sahota put in	Yes
5 – staff students integrated – and used campus and community – Does TA occs use similar demands on com/benefits	Yes , use same primary health facilities and would contribute because working
Area well catered to look after and service/supply everything temp ho. Occupier would want.	Sign. Higher proportion of PHealth facilities here than some others. It is comparable.
Re use of emergency care facilities – demand similar	Broad pop demand, so no difference in demographic.
6 – use of London busses – would this be similar	Exactly the same. No reason why it would be different.
Would be travel be the preferred option	Might be the only economic option available.
Been to property – seen needs to be repaired – low demand?	Yes
Would temp ho be better use of buildings	Yes
Re other educ institutions... have dealt with that. Now to David Lewis Proof – E3 4.3.1 Agree?	Yes – because demo profile is exactly the same
So would disagree with he table we just went thorough, where 5x car use	Yes – where higher.
KC opinion C1 – pdf p 66 – para 35	Agree
36	Agree
37	Agree
Back to AC Proof – S7 – still share opinion that culminated in s7 – esp 7.2-5 that reasonable/proportionate no MCU	That is my professional opinion.

XX

Question	Response
Start with expertise – BA/MA in fine art	Level 7 masters diploma

Say at 1.6 – holds masters in strat management and leadership From website – PG diploma in corp gov	
No planning	No - that's not why I'm here
Not legal	No
Transport	No
AKA bought site June 2024 – when first instructed	March 2025
Para 1.9 – did not seek planning for COU – Did you not know that client did seek pp	Possibly not
So in jan 2024 – was pl app for MCU	Understood that was planning in place, but not why I'm now instructed
You said pp not sought for COU	Yes
In jan 2024, there was an MCU	
So can we delete 1.9	No – because premise was that not MCU – and omission that an error -
So not MCU – possibly incorrect	Poss incorrect, but not relevant to my MCU
Go to doc C13 – pdf p 5 – RfRs – 2 nd reads – reasons – they are planning reasons?	Yes
Based on impact that C thought MCU would have	Yes – it's a planning doc
C concluded v much an MCU and Rf on basis of those reasons	Yes
Was your PoE reviewed by Mr Sahota and Mr Gillick -	
By both	Liaison was by mr Sahota
Didn't tell you anything about this?	Didn't think this would correlate to my remit
Weren't told	Omission of a line re planning; is unreasonable.
Your evidence: 1.1 – are you giving evidence on scope of pp?	Just making comments on the docs I've read
Are you giving evidence on scope of the historic pp?	No – just on the docs that I have read
Say given pp for use as hostel – have you been told that	Only from docs made available
What doc	The submissions made by Mr Sahota about submissions
Which docs	Any that related to planning applications
[q is why you think starting point is that it has hostel accom]	
Are you hear to deal with the hostel	I'm here to explain what a hostel is.
Starting from assumption that lawful use is hostel	Yes
Not giving evidence that lawful use is hostel use	Yes – I can't give expertise to explain that.
In EIC – asked no. q's about historic use – One was 'you've read all docs and been through all evidence – have you seen anything remember	Yes
Answer was no	Yes

Asked any evidence that it was a training college – said no	Said no because irrelevant to whether it is a hostel or not
Have you been through all docs?	All those available to me
Checking... F2 – p.93 – have you seen this	Yes, seen it, but not necessarily read all in detail
Para 6 – cttee do approve scheme at para 6 – for dev MC and DH for Garn. Col – do you see that?	Yes
P94 – approved for Garnet Col	Yes
Resolution to approve those dwgs of MC and DH by Garn. Col	Yes
P100- - WBC – TP committee consulted on LCC proposals – extract from TP cttee – MC house and DH – erection of college and ancillary buildings; then resi and report below. Having looked at those docs; it is incorrect to say no docs supporting view that MC and DH consented as one proposal as a training college	I don't have the professional capacity to answer But doesn't go to my evidence about hostel uses.
(arose out of EIC)	
1.3 of proof – this is Garn col?	Yes
Point me – what was MC building used for by Garn?	I don't know – and don't have planning expertise Understanding that site as whole was hostel accom
But again, starting from that assumption	Don't have prof. credentials
Do you know what MC used for	Don't know
Picasso house – do you know	Off top of head don't know
Principals resi	View of all of those units as to whether meet descr of hostel.
So you don't know use of principles house	Considered site as a whole can be used as a hostel
[you can say don't know]	Don't know
1.5- your evidence is about a hostel	Yes
If it ends up that site is used as a training college – you are not giving evidence on that	No
You are not giving evidence that change training col. To TA is not material	That is not in my scope.
1.11 – looking at legal def. of hostel – I think your approach is, if it meets def. of hostel then there can't be MCU if the new use meets that definition	That is correct, in my opinion.
1.13 – say prev use of accom Reads... What did you mean by current planning classification	The original that it was issued as a hostel
But you are not giving evidence as to what original pp was	We have looked at the legal def but I'm not qualified to comment on planning.

So when say legal framework – what do you mean	Under the Housing Legislation – I'm here as a housing expert
Know you're not a planning expert, but what is the legal test for MCU	Can't answer off the top of my head
You've said there is no MCU, so what test have you used	Have used legal def. as housing law as to what was and is.
Answer is whether there is a change to the character of the use.	Yes
Extreme – if office, change to TA use – clearly change to character	Actually I do know that – because in prev prof expert had to argue that .
So office to TA – clearly different in character	If pl. given for office, yes
Said in EIC – that office use MC site was ancillary – please show me evidence for that	Prof opinion is that on site used as hostel site, education, training, office, healthcare facilities would be considered within a hostel environment
Spec office use of MC – you don't have any evidence that in fact ancillary?	I don't have any to present to you now no.
Doc E8 – photo – dpt FM – environment team, MC meeting room, hospitality, finance, uni head of security, projects teamdom services, grounds – nothing there suggesting office use is ancillary to the c200 beds on site?	They would be ancillary to the use of the site
But part of wider uni use –	Not nec – would also relate to the operation of the site – would expect any housing
200 beds wouldn't need an environment team	Can't comment on the uni use as a whole Could it be used ancillary – yes it could – I don't know how uni. Used it
Think use by UoR of this building was ancillary to the 200 bedrooms on site	Disagree – because the facilities could be utilised by those units, - but can't speak whether wghole uni
	Could be used by accom. Might have them
Envt team	You could have one
What is defn of ancillary	Something to support a function.
Do you accept that uses within MC – unlikely would have been solely for 200 beds	Don't know In prof opinion – yes they could be , but were they – I don't know.
Is it your evidence that there can never be MCU in planning terms from student to TA?	Unreasonable to say can never by COU be for anything
So are circumstances where student block,	If original classification was amended to be student accom then maybe
If I finds lawful use is student accom would be MCU?	I don't know – it's planning and I'm not answering that.
Is evidence that will never be MCU student to TA	Never say never- about indiv chaacteristics of the use
Could be	Has to be significant change
No there doesn't, but you are saying SA to TA could result	Hypothetically potentially – not in this situation.
Are you saying evidence is limited to starting from assumption that lawful use is hostel.	Yes

Not looking at situation if lawful use is student?	No because I think use of student is irrelevant
Then evidence must be that can never be MCU SA to TA, if use is irrelevant	In this case no, but hypothetically.
Say we had a pp for the site and it included 'student accommodation' and the proposal was for TA – saying would not be a MCU	So premise is if pp was for sa
Yes	So if it had been given for SA – then MCU, could say hypothetically it was correct.
Would be MCU?	Hypothetical
Hypo because don't accept that planning for SA	Yes. In this situation.
Legal den o hostel – rely on HA 1996, HRA 2017 – not planning acts	No
None set out def. for planning purposes	No isn't it Sui Generis ?
Think that all leg aimed at either provision of Soc Ho and providing housing for homeless	Yes
None address Stud. Ac at all?	Housing Act.... No it mentions HMOs, but no.
S622 Ho Act 1985 – (proof 3.4) Set out resi accom – (italic section) – broad definition	Yes
Hotel would fit that?	Potentially – not nec have facilities for prep of food
Either board or facilities – could have provision of food	Yes
Care home would fit?	Not nec – could have self contained
Could fit?	Potentially – but care home is a regulated activity. Broadly could fit
Boarding house as boarding school?	Broad, but potentially, but wouldn't nec be defined in Ho leg
Prison	Possibly – but that's regulated activity
But exploring broad def Backpackers hostel	Yes
No temporal limitations	v. rare that someone would stay for several years but areas suggesting – tech could be correct, but demographic for particular use is not ref. in host. Accom
There are a number of uses with dif characters that fall in that	Potentially
Can't be right that just because uses meet defin not MCU between them	Don't follow
Prison-backpackers	But not housing – need a legal definition of tenure
Exploring breadth of hostel – encapsulates any number of diff uses	It does, but it has to be a housing element and needs a form of legal tenure.
In def – legal tenure is not something relying on	Separate element, but Ho Act as a whole applies to all housing as a whole; but several areas of Ho act will apply -

But here we have defn of hostel – HA includes no. different types of hostel –	If looking at MC – look at entirety of how site was run. Need to look at length of stay, demographic etc.
Dif ways of meeting homelessness need – so dif types of facility – here defn of hostel – but so broad, that just because 2 uses don't meet that def , cant be that not MCU	
Just looking at legal defn – but just because 2 uses meet definition doesn't mean they are the same use. 2 dif characteristicly dif. Uses could meet	Yes. And both be a hostel
So has to be resi accom otherwise thatn in self contained resi	Yes
Premises in Mr Curtin's proof would be self contained?	As in being a room
With own kitchenette/bathroom	That is the modern hostel.
The legislation	From semantics point, but when creating new hostel accom- most will have self contained facilities – kitchenette/ensuite But significant communal facilities that would define it as a hostel.
These units	Would say, they are technically self contained, but not particularly given element of shared usese. Broadly agree, in totality not
HReduc Act – defines as follows (3.6)– text not from 2017 – don't think it mentions hostels at all	Think its from the code
Doesn't add much to HA 1985	No
Ho ben regs – otherwise than in s/c premises I can reach a view on whether they are S/C Ref to management	Yes
Student accom wouldn't meet Ho ben reg test	No because students wouldn't. claim it
	Not correct that assertion stud ac not run by a registered provider
MC not managed by RP etc	No
Or operated other than on a commercial basis	Not to my knowledge
App is not for a hostel – its for TA	Yes
So no legal defn. of TA?	No – quite a broad spectrum, but a lot is in hostel acom
But could mean anything – doesn't need to be for the homeless	Usually it would be, while Homelessness asst completed
Does in your field, but not term of art	Yes
Hotel would be temp accom	Yes – technically
3.16 – I'm your man – what do you mean	Use re defn. of occupants – would say irrelevant because in hostel accom there is no definition

Aware that LPA relying on it?	Need to rephrase
It's the appellant	Yes
Are you making a legal submission that must have a condition to regulate use	Can't comment
So occupants have no classification – what do you mean	Demographic of occupant has no classification The type of demographic is blind. In hostel accom
So back to premis that this is a lawful hostel, but if it was student accom then might be	Yes, but student accom can also be provided in a hostel setting.
HMO use – said repeatedly couldn't be HMO because of who administered by	Yes
Nothing in certificate that would require it to be run by LA/RP	Can't comment. But know that is the section in PoE – that's the intention.
But if this were granted, would be purely for TA	On that basis, nothing to prevent it being TA.
Also agreed hotel could be TA	Usually TA is managed by CBS, LA RP
<u>But you are coming at it from homelessness, but if step outside, TA could be wider</u>	<u>Appreciate it could</u>
Know there is no element of care	Yes
Intention is leased to C/HA	Yes
If that were to happen, what would occur is site would start to accom HH on LA list	Yes
And proposal is for c. 257 beds – how many FT/PT staff would you expect	Would need to assess based on the site. Usually – if TA would normally have mobile team, but varies on site
On this site	Volume of no's would need to do calcs – usually staff would be on site to offer advice/guidance re. tenure to a HH with a view to support them to move on. Some sort of security mobile team.
So 257 beds, how many FT staff	V low level – would need to do calcs – but usu not an enormous caseload – could perhaps have a couple of staff on site, but haven't given this consideration Would also use LA staff/other community staff
But not hundreds of staff- but prob between 1-5	Reasonable
Would you expect staff to live on site	No But would be staff available – might be mobile or on phone
What would MC House be used for	Could be for myriad of diff options. Not within my expertise to consider the explicit use of all the buildings. Eg office space to support op del of service'; for accom. But can't give specific opinion

Communal facilities	Yes
Picasso house ground floor?	Don't know Could be a myriad of dif uses.
Accom, office, communal	Yes
Know that purpose would always be temp. That is what it's doing -	Yes
When more permanent solution available would move on	Yes
Their room freed up	Yes
Presumably nature of licence has to be sufficiently flex to accom that don't know when more permanent solution	Licence not nec about when permanent solutions, but that no excluded use – so no temp accom
So what getting act – someone could be day, week, year – just depends on when permanent solution comes up	Depends on when the solution comes up, but they might need to leave – non payment etc- or they choose to leave themselves
If someone there for a year, wouldn't just be kicked out	Could be; could not be , and another licence would be issued.
Right that wouldn't expect SA to be used on nightly or weekly basis	Technically could Premis is same – its an excluded licence
Need to deal with what is typical – Students – reside during term/away hols/leave end of year	Yes – some might be for a calendar year
No evidence before inq that typical for nightly	But licence is form of legal tenure; tenure is irrelevant
Now dealing with character Typical character – term/hols/ 1 year	Yes
Some might stay for year	Might be requ. Of tenure – might need ot be
But typically go home	Yes
Not typical to hire for 1 week/night	Licence would always be for longer period; but could stay less
Not typical for student to have people there just for 1 night/week.	Not typical, but
[typical oc behaviour of student]	Looking at broad spectrum of demo – can't assume student populous is all the same. Some may be whole year; assumption that 3 students would go home, but personal experience may stay there for the whole year.
[less than a year?]	Probably not- because about tenure, nota bout occupant. But being pragmatic – would expect them to be there less than a year – not nec, but licence would allow them less than a year
In proof say extn on 12 months accom unlikely; See appendix E to ST – CD E12 – p33 Most common stay 12-24 months	Would probably include supported accom – where stay would be longer than temp accom as a whole. Licence still for a year, but now v rare that 24 months in supported accom
Highest actual – at fig 9	Yes – but this is 2022- last 3 years. And also inc supported accom – regulated activities; length of stay would be longer.

	In last 3 years due to gov efficiencies, has been cut, and usually now would be 6-9 months temp
Certificate would permit supported?	It is unlikely that would be TA – that is usu during assessment; but usu unless emergency, people with complex needs not in TA
But breadth of use, not just confined to homelessness space – could end up being supported	Unlikely because if Risk As then rare that they would be placed there -remiss of Council
But would certificate prevent that [would it come down to support services]	No
Nothing in certificate to prevent this	Comes down to whether it would be appropriate
[decamped to other room 17.00]	
Don't have a cohort of people arriving together	Correct
In character terms, that is different -	Yes, but not not next all cohort will arrive and depart together, but, en-mass yes
So materially different	Only if MC were student accom – but I don't recognise it as that.
Taken to UoR letter – D2 – made available to other institutions – nothing to suggest MC has	Nothing to say it was, could be whole stock, but doesn't say it wasn't.
1 st UoR letter – D1 – 4 th para -reads... If it is right that the lawful use is student accom, then this term time behaviour would be a material difference	Assumption made that residents of TA may not be able to leave for periods of time is not correct
But re 'going home for summer vacation', then coming back – either same or new cohort – is materially different?	Hypothetically, there is merit, but given withdrawn/overturned by Uni. They have changed this with a different opinion.
Uni has not said any of this info is wrong, or lied	No – just that different opinion
Put aside fact said by UoR – if it is correct that students there for 3 terms, go elsewhere for hols; that would be materially different – if lawful use is students?	If temp on hostel basis – not unusual for them to vacate for between 2-6 months
[go back to the same room]	Not necessarily, but managing agent has right to offer a different room
But wouldn't get to end of term and everyone leaves	No because no term, but tenure doesn't see that. Tenure is based on occupancy.
Looking at character of uses – but if lawful use were student accom; and I accepted students tend to go home for hols – that would be materially different in character to TA	Yes and no – But tenure could be issued for a year – would meet requirements of hostel accom. Someone choosing to leave not a material dif, but a choice
If C is right and lawful use is student accom – say there was a pp that said 'student accom' one feature is you would expect students residing in term time/ then going home	Yes, but it would be a choice Suggest the premise of the argument is based on the tenure Lifestyle choice could be to go for 6 months – that would be for the occupant

But re character of use – if lawful use – students there term time	Broad assumption
But temp accom – people would leave/come back, but not according academic terms	No
May leave for a period of months; come back On C assumption that this is a student use, that is materially different	Hypothetically – if c correct a difference – but I will always see it in terms of tenure where there is no difference
In PoE say Garnet Did not operate on term times	It will be in some of the documentation
Has someone told you	It would have been initial submission put forward. – but can't give doc now.
What evidence that students over 25	Because they were working age adults
Who came up with 25	Because they were training – its an assumption – but not definitive.
Fact students leave for vacation – during term time. Indicator of likely place of residence.	Anyone could have another place of evidence. Someone in temp accom could stay with family
But re character, students do have a place of residence elsewhere	Correct, but hat is also a reasonably assumption to apply to TA.
Reasonable to assume that a students HoR room doesn't need to accommodate all worldly possessions	No, neither does TA
So would they also have other homes?	Depends on category – eg domestic abuse might. Young person, but technically might have another place, but for now can't be there
But in both scenarios, they can't be where their main place is	But usually there for 52 weeks while they are assessed
But not an expectation that they can return home	They would have a duty to be looked at
While in homelessness accom, would not by rights have another home to return to	No , but while students could return, also not nec, legally theirs – just another home. Not correct that they can all return to a steady form of accom
Dealing with 'typical'	Understand.
Correct that use/student use and Ta treated diff in legislation an policy	Yes differences, but SA could also be in a hostel setting
Stat obligation to provide homelessness?	Yes
Not student	No
But are policies preventing it being lost	Yes
So treated differently in lge/pol	Blurr - because SA could be a blur.
[Difference student halls/stud ac]	Tech dif in operation student HOR and hostels is the same structure
[same or different things?]	Technically could be the same, but use of terminology is different
G7 – p36 – p4 how homelessness defined – reads...p5 – table4 – scenarios where can be prevented.	Yes, but majority of HH in this category would have significant needs and would only be placed in TA for v short period of

Strikes how vulnerable homeless are as a group – fair?	time before going to specialist/supported accom
So cert defn – nothing to prevent these	Extremely unlikely someone leaving care etc would need to be here – they would usually be in supported ho; resi care
But terms of certificate not prevent	No – but these are very extreme categories
Escape dom abuse – could be housed here	Yes – but unlikely given risk to the person
Left rehab – cert wouldn't prevent	No – but v. unlikely because would be heavily planned in advance, because there is a statutory req here.
But no restriction in certificate	No, but unlikely.
Back to not having another home to go to, effectively	Yes.
P 26 – health outcomes in ... Reads...	Doesn't apply to general populace of those entering TA – usually extreme homelessness in rough sleeping
Doesn't describe it like that?	No but also ref to st, mungos – v extreme. If you worked in the sector, you'd see where that data comes from
Nothing in statement ref. to rough sleeping	But that is deeply entrenched homelessness Someone approaching TA wouldn't expect to have those outcomes . this relates to deeply entrenched homelessness
But could go there	V unlikely
But could	V rare that they would
....data from... re health stats...	Yes
3 rd bullet point...	Yes
Mental health – p 27 -	Yes
People experiencing homelessness. Etc – lists various conditions – see that?	Yes
It's right isn't it that incr phys/mental health in hlness	Yes for those experiencing long term, deeply entrenched homelessness, but looking at equality data presenting to Wandsworth that doesn't back it up Looking at homelessness link – they are dealing deeply entrenched homelessness (they and st mungos are main contributors)
[Those presenting to wands. Who are they]	H Click data – wouldn't show that level Majority prob don't have very long term history of hlness – wouldn't expect them to share these life outcomes
12% re GP survey – NHS survey – not st mungos/HLink	But data on a whole – that all is collated as a whole- not individual parts of H data
First part from GP survey data	Yes
Where in report say that it doesn't apply to all data	It doesn't.
Live tables – first doc in G7 p4 – history mental health 21% - 12% general pop	On a broad spectrum not unexpected

Separates out drug dependency/alcohol etc. A has not put typical mental physical health needs of students in evidence	Think these statistics apply to populace as a whole, not just homelessness. Can be short term Hlness too and long term.
Where do I see phys/mental health needs of students	Don't have any – just my experience
If I accept based on study – that Hlness pop have sig higher health needs – that would be a material diff – hlness and student HOR?	Again would categorise that data applied to HLness would be broad spectrum – would be general pop as a whole – if materialises to long term HLness – then would expect those life chances to materialise But in TA – life chances etc likely to be more closely aligned with general pop.
Hypothetical basis – if I accepted likely mental health needs hlness in TA would be higher than gen – that would be material dif	Hypo – disagree – because presentation as someone presenting as hlness to Wards could be same as anyone here. So presmis of asking Q is flawed.
So wont' answer	
Aware UoR has on campus gp and prof counselling	Yes
See D1 – p2 - penult para – reads.... Correct that this proposal has no care/GP/Counselling/Careers services?	If TA was managed by RP, then (not nec GP, but maybe) then those things could technically exist. But given context of this letter – expectation is that will register with local GP while there -
Where do I see evidence – so on campus GP	But it will be a private GP
It will be NHS GP from local surgery	Will be same because satellite service. Matters because if GP run as a satellite, that will come from the local GP resource
Can TA use on campus GP	No, but can use surgery
Can they use uni counselling service	No, but wouldn't nec need it
So fi right, that no care being provided – it is correct isn't it that more reliance on local services?	In terms of primary care, no , because that is provided by NHS. If support GP for uni is from Private, would agree, but it is not, it is satellite that comes from NHS. So the effect is the same.
– can see useful to ensuite/self contained	Same for pop as a whole
If you were running, wouldn't put single mother child/ in same block as man with drug issues – would manage it	That is how you would manage any accommodation.
Right isn't it that no evidence that student accom here resided in by couples or hh with children	No. But same for hostel provision for younger people/older persons – wouldn't see those cohorts either.
Said in proof and EIC – that largest proportion of applicants are HH with children	For W, but there are also very many opportunities
Nothing to prevent this facility housing children	No, but not appropriate as wouldn't be safe

But not different o if a large no. of children	But same in hostel accom – could be dispersed buildings – some could be assigned for certain categories
Hypothetical that lawful is HoR – wouldn't expect children	No
But if are likely to be children in TA – there would be a material difference	Won't answer hypothetical.
[answer it hypothetically]	No – in some student accom, there can be mature students with children.
Think no evidence of children during Garnet/UoR	Not to knowledge
If I concludes lawful is student; presence of children in TA would be materially dif	If consider students now- could be some that accommodate children. If you are looking at Student accom – what I was in 1960, it's different to 2025. So I can't recognise the premises being made.
Hypothetical Use solely young adults v one that is childrens needing school/play space- that's different	This is a reasonable point.
When UoR shared kitchen/bathrooms	Yes
Forced to socialise with people sharing	Potentially
In your proposal, no need to leave room at all to cook/use bathroom	Would also be communal facilities offered as well. Technically would need to use some communal facilities – eg laundry
But re needing to leave bedroom every time need bathroom etc, materially dif to self contained	Re hostel But much student accom now offered as facilities. So the premises is flawed, things are different now. Much stu. Accom now would have en suite
But dealing with this stud accom; and know it doesn't	Yes
So materially different	Based on historical use But not in student accom nowadays.
In student accom – attending uni	Yes
UoR know has student union, bar, clubs libraries, etc.	Yes
Soeley for students?	Potentially
UoR typically lectures 3 days a week	You are telling me
Typical day Uni student- 3 days pop to campus for classes etc.	An occ of temp accom could be going to work/uni/college.
If lawful use is student accom – then that won't be typical day of those in temp accom	Uni lectures are not offered at MC, technically, a resident could be doing all of these things – study/volunteer etc
What no doing is all going to UoR campus	Can't assert they would all be doing that anyway. 70% of people on any day could be going to work.

	Assertion that they are going to Uni is irrelevant – it is meaningful and purposeful activity that they are doing
Student accom – all there because studying at Uni	Not all – some used for other purposes. Some other were there And may be other institutions
Assume used by UoR – all students 3 days per week walking to campus – that would be the expected part of daily life as student?	Yes
Not the case for TA – some could be studying, some empt, some volunteering. So re disparate types of ways people might spend day – vs. common might spend their day – mat diff?	Don't accept – its terminology – it's a meaningful use of time; that is all that matters. This could be anything. So actuality of someone in temp/stud - meaningful use of time.
Typical undergrad 18-19 years old	Potentially
Uni says over 21 is mature	I wouldn't want to stray into age.
You have not given any age profiles	
Your proof p 15 – ap 1. – av age below 34 where from	Comes from their WD letter.
Not sure it does – But this is right isn't it, it's going to be well below	Likely
Actually most students in HoR likely to be much younger than 34	Potentially
See fig 2 – only 17% Hness apps under 25. Means that 83 are above that age.	Yes
Again – if I accepts lawful use HoR, age profile between HoR and TA materially different	Will be a difference. 55% wre 25-34. Don't think its significantly vastly different. But could say diff in age
Say 60% are first in family to go to uni Give as an indicator of deprivation But not same as homeless	But it is a national indicator of deprivation
But point?	Likely that will have come from families who have experienced deprivation
How simar – what is relevant	Because uni says there is an element of deprivation, because that populous presenting as homeless will also have experienced deprivation
[but deprivation and homelensess don't align]	But indicators of depr would be attend uni/having had job/live in insecure accom/
[really}	Yes – they are national indicators of deprivation
[are indicators of deprivation – mean both use the accommodation in the same way]	Yes – because there is no difference in the accom.
But earlier agreed students typically have another home/homeless wouldn't	Potentially.

Employment – said EIC most students would be in FT employment	Maybe – some – but likely now 2025, that sign proportion would be in FT
Most?	Sign in most
[in FT]	Full – or $\frac{3}{4}$ days per week.
In addition, some PT on top of that?	Yes
No percentages?	No
If go back to G7 – broadly 27% in FT/PT work?	Yes, but doesn't recog voluntary employment.
How do we know	Because used HClick – that's how it is captured
Students wouldn't be captured in voluntary work	Might do
Most students vs 27% TA – materially different	Just because not working, doesn't mean they are not meaningfully using their time.
Transport – gave a view – you were taken to Mr Marshall – table 6.1 – said don't recognise these figures – not usual. Obvs not done any trans analysis ?	I would re TA use when applying for PP in the past
For this inq?	No
Aware that institutional hostel use – came from surveys of 2 hostels from YMCA – aware of that?	No – but 2 hostels in YMCA could have particular geog purpose Sign proportion employment hist is with YMCA – their demographic not the same – they have particular purposes. Hostels have different usages – so do not nec comply.
Prob not have cars – [what is view on cars]	Not likely to be an increase
No evidence about proportion	No.
Pol LP28 – were asked – in EIC – Para 6.68 of ST were asked – and said immetieral because hostel demog blind	Yes
But if I finds Student is lawful use, it would apply	Hypothetically yes – but I say it's a hostel.
IQ	

Question	Response
1	Given time issued – prob unlikely. In our area of opp we have a planning team; and hist planning we've looked at don't tend to . Prof experience of looking at other descriptions.
2.	Not particularly – but def. changing in 1985. Def was from 1940s – Then it would have been from nat service hostels corporation 1941 – created accom for people who were of working age population.

[garnet college – is that what is was doing]	Yes – it was for working age population. Only move away was to do with gov funds. Hostels always had people working who couldn't access accom
What changed in funding	Funding changed in 1980s – access to benefits – if worked, could no longer live in hostel, because cost of hostel accom increased; and so wouldn't have been able to afford it if you were working. So it phased out over time.
6	Just outlines that occupancy delivery has not changed. So operation for students/Hless is the same.
10	Data is from HClick data – percentages Rely on the numbers printed next to the lines
13.	Typical of general populous Student likely to have exactly same challenges as gen pop, as someone living in TA – because challenges are unknown; particularly if coming from an area of deprivation. Your life chances and opps are similar
[day to day life]	Yes students would be going to uni, but its all about meaningful activity – so day to day life could be exactly the same Someone in TA more likely to be involved in com than a student [why] Because of exposure to different pressures. In theory a student in 2025 could be doing the same, albeit students might get up a bit later
15	FROM OP DELIVERY expereiecn – managed enormous SA in surrey – 200+ - challenge was more significant than a hoste. – but that is not always the case. Quite often TA experiences lower levels – tends to be more complex need establishemnts that cause these prblems – unlikeyi at MC

RX

MC was quoted as broad use class – ashamed?	Should be proud
Are there any major diffs between our proposed/existing/1960s use	No exactly the same
Re Daniel Curtin's self contained units (so called) Go to doc E 12 – doc in 21C Britain – table – this doc just deals with hostels?	C for HI – core area of work is deeply entrenched rough sleepers -

Table 1 49% purpose built ho – that is MC	Yes
A bit confused that no big hostels, but fig 3 most 10 beds or less; is that an indication of diff type of hostels	Yes – this is entire scope – some might be 4 bed, up to 300 units
Table 2 – bare in mind – Daniel curtain ‘self contained’ – this doc deals with hostels – says no unit with exclusive use of kitchen etc 26% - still hostels	Yes, because hostel space
If remove kitchneetts, roughly 55% have ensuite at least	Yes
But wouldn't totally be self contained	Correct
HMO – controlled by license, issued by LA	Yes
In a hostel in 1960s, would a management plan be requested	Too far back to answer. Can't definitively give answer.
UoR letter D2 – was replaced by letter – correct	Yes
Go through later letter (WD letter) – Point 1 licence 51 weeks – similar to temp ho	Is potential that another can be issued, but on the whole less than 12 months
75% ethnic backgrounds, /low income deprived background Would they have a similar economic impact in Roehampton neig to someone in neighbourhood.	
Garnet col - read out please	Was read out -
So Garnet Col what age	Over 25
3 rd level instution or not (so university that people go to after school)	Yes
Impact of students vs temp ho people – in particular re medical facilities – similar impact in neighbourhood to each other?	Exactly the same – as Primary health by NHS practitioners
Read para 4	It is the NHS practice delivering it
Is NHS funded locally/nationally	It si part of PHCT – so national funds
6 – day to day life of students v temp ho	Basically suggesting uni students making use London busses – exactly the same trans infrastructures
Short term occupancy was brought up – as would be materially different. 3p also brought up that units in summer were occupied, eg by people on holiday going to Wimbledon. Is that diff form a neighbourhood point of view to where temp ho people move in/move out a day later	Technically it comes under legal tenure/hostel accom. Exactly the same
Re E7 – ST proof – 3.3 re Picasso house: 'I understand....' Any pre-described length of tenure	No – could be based on license – easily under 12 months
Is this supported accom	No, its TA
Vulnerable people – could LA dump vulnerable people in a hostel/TA and what legislation would prevent	More a duty of care In terms of Ho law anyone placed anywhere, but remis re duty of care.
Have you ever seen a mechanism in planning legislation to protect people	No, but no an enormous knowledge.

G7 – can the operator decide who goes in here:	Yes
Fig 1 – have you given opinion that a suitable place for children to be put	No, but depends on how configured. But in a mixed use with eg 5 beds, unlikely that a children put there.
If its unlikely, then on fig 1 – potential audience of 10,620 males, 7150 females, 280 ungenered Do you think that is a big enough audience to occupy to a reasonable proportion this facility	Yes. But given lack of TA nationally, there is a crisis. So this is reasonable.
Covered NHS practice; kids; re life of a UoR student – goes to college 3 days per week; what do you think they would do similar/diff to TA person for rest of time	Not nec anything dif. Everybody would live their lives, but general life functions of people fairly, broadly similar
Opinion of UoR , what sort of uni goes there?	Demo provided by uni is clear that 60% in indices of depr.
Is a YMCA hostel comparable – what is it like	Myriad of different ones, but lots of different types; also provide student accom. So using for traffic, cohort could be completely different.
Your proof - ap 1. Look at table at top and change legend – could be corrected (as suggested in my note on the doc)	Yes
3p gave some colour to use – would that tie into temp accom.	Yes – would be the same.
From opening statement this morning – para 37 – real losers here... etc. 1 in 50 people etc... Give a bit of info about these – its been suggested they are vulnerable – how effectively normal are these people – and cf students	Majority of applicants housed in temp accom are broadly demographic of the normal populous.# Suggestions put by the more complex/deeply entrenched ones can get moved elsewhere – and exacerbate problems
Eluded that students go away in breaks and have a house elsewhere. Would they really? Do people in TA have a second house	Some might have somewhere to go; in both camps.

Discharged.

Sincere thanks for sitting so late.

Agree 10.00 start tomorrow.

Witnesses should ensure they have downloaded the latest evidence file

Adjourn 19.10.

Day 2

10.00

Inq docs from yesterday all sent to PINS.

Mr Curtin

EiC

Question	Response
Present presentation/PoE – run through, starting with experience	Partner KSR Architects, summarising 1.4 Were approached to look at scheme re existing buildings and how upgraded, plans looked at.
Have you done hostel schemes	Hostel, and TA schemes of various sizes .
Done many planning apps	Yes .
Run through site location	Adj Richmond park, Alton Cons are, LB. Surrounded by Alton Cons area estate.
Site plan	Commissioned Topo to locate buildings. Used for review of plans/ Site consists of residencies, Picasso Ho, temple, MC & delapidated bungalow
[is principals house the delapidated bungalow]	Yes
Descr assets	G1 MC house – is at front. Temple also listed.
2 is Picasso house	
Re citizens advice	Is a CAB set-up
[in Picasso]	Yes – never seen it being used, but always been empty site when been there.
3 is?	Each building has names – the A buildings
4?	B's (details given)
5?	C
6	D
7	E
How many individual houses	15
8?	Garages – delapidated
[Temple 9]	Yes
[Bungalow 10]	
Drawings 3020/P5 – F2(p57)	Had a topo taken and measured against what was onsite. Overlayed this drawing on CAD. Predominantly are identical, except for principals residence- believe moved due to ground condns and trees. But 15 blocks/PH/MC H are predominantly in same place
What are 15 blocks labelled as	Hostel units
Look like a planning doc?	Yes
In a modern PA, what would it be?	Site plan, not of a scale of location plan – it's a site plan.
Has 15 hostel building	Has a large block where we know Pic H is

	Also MC House and the temple, and also the principals residence – we call bungalow
This is on site now	Yes
Neighbouring buildings	Have listed accom down side of minstead gardens; and also the tower blocks
Listed buildings down the side – what are they?	Single storey, old people's housing
Been to site many times>	Yes
What is your analysis of those	Having walked site, certainly in occupation, mixed tenure
Have you met anybody	Yes – met one resident – he asked Qs about the proposal and future of site – had a chat
What are those building labelled	'single storey old people's housing'
Was he...	No – he was mid-50s
Are they owner oc, private, who lives there	Don't know – gentleman didn't divulge. Don't know
Understanding not solely old people	Gentleman certainly wasn't elderly.
P9. Proof	Have series of aerial photos Show site in context
Correlates 3020	Yes – by anones eye – looks to me to mirror drawing
p.10 -	Photos of site taken at SV
Photos of site from your SV	Yes from a series of diff SVs. Visual obs were some dilapidation, some signs of damage over time and damp, collapsing ceilings
p.11	View 6 – one of rooms showing how found on e of rooms
P13.	Indicates much of what discussed – 4 key elements of the house. – as above
p.14 Ground floor	Series of rooms, labelled laundry, canteen, kitchenette, office spaces and toilets
What section is CAB in?	On right hand sid. Takes up east corner of the GF – see notes on plan in proof
How heavily utilised	Just boxes and stores – only CAB looks like set up for use
Under utilised?	Yes – its empty
1 st floor. [bottom drawing p 14]	In 1960s style 'streets in sky' – 2 staircases lead to external street. Leads to series of accommodations. All have shared kitchens and shared bathrooms.
Go to plan – top and go anti clockwise – pick a room, led by front door	
Has bathroom	Yes
Small kitchenette	Yes
Next unit?	4 beds, open plan kitchen/dining/separate WC, bathroom.
Next units	Similar to first 2 bex unit
Fair to say none have living rooms?	Yes
Next unit	Same again.
Next	Same again.
Next unit over corridor	Shared K, bathroom, rooms

On corner	7 beds, 2 shared bathrooms, shared kitchen
In centre	6 rooms, shared kitchen, one ensuite bathroom, 2 shared bathrooms.
Do these represent self contained units	Series of beds off shared kitchen/bathrooms – so no
Rely on community facilities	Not huge amount of recreational/living space
So would rely on room being ID – laundry,	Yes No laundry/facilities
Dining	Kitchens are small, would not be able to get many people eating at same time
P15 – basement -	In existing basement – some sort of metal workshop, inc cutting equipment, and equipment stores There is plant equipment in B4.
What is that plant used for	Centralised plant system – not an expert, but series of mechanical plant leading to main building.
[openspace to left with pillars]	Undercroft – enclosed, not been in.
	B1, 2, 3, 6, all store rooms./chemical stores
B5 metal workshop	Well, a workshop of some sort
Classroom?	No
For maintenance?	Yes – don't know about this building, but for maintenance
So are B,6, 6A etc to service/look after these buildings	Yes, from my visit.
So do you feel the units are not self contained	Correct
Rely on services of GF to function	Say limited amenity/break out space on the FF, and need additional space to live.
On to 3.3 – images	This is to give a look and feel as to how we think PH/shared facilities might be upgraded to modern standards. Shared facilities and rec. rooms
p.17 –	Existing block plan of 1 (they are almost identical)
Are these firm plans?	They are suggestions of upgrade of how could be upgraded/could be laid out
Mentioned did a lot of planning apps, if this was a pl appea – do you think that difference between left and right is a planning application	No , nothing changing externally. All internal
So subject today – is this layout relevant/irrelevant	Relevant in showing how buildings could be upgraded to be much better.
Do you think right hand site is subject for a LDC	No
How did drawings come about	Visited, saw existing condition/how could be upgraded and how in their current use – small wardrobe, sink, quite dilapidated. Look at upgrading entire block for private shower/little cooking station/kitchenette
Would this be suitable for a student	Yes
TA person	Yes

Is the design different for them	Absolutely not
Who's suggestion was this design? Shower, ktich, etc	Communal effort, looking at the scheme. Based on similar scheme elsewhere – upgrade is an easy win – plumbing in place, so seems sensible if upgrading to provide own wc shower, kitcheneet
Aware that local authority asked for this design	No
P1 18	FF, all blocks almost identical Proposal that if people using would be having own w/c kitchenette – could expand into existing bathroom facilities – and could also use Picasso house, so opp to create 2 single beds per 15 units.
[correct this]	Opportunity to create 3 2 bed units per block.
So change in accom schedule?	In terms of no. bedrooms – moderate increase in 2 per unit
Turned into self contained	No space for living/no space for clothes Not fully equipped.
Would the 2 bed units – would both need to be bedrooms	Not necessarily
Would this plan automatically increase no of people?	Not nec, but if it did, only by a small number
Are they self contained?	No
Yesterday space standards intro into evidence. Do they comply	Irrelevant – because apply to Dwellinghouses, but not for this scheme
What gives impression these are not self contained	No space to sit/living room. Kitchenettes not adequate for every day living. No place to wash clothes.
Where do services come from	All from the central plant room in basement PCH. Form viewing site have not seen any evidence of individual metering.
Say space standards don't apply	No. these are for C3 uses.
What standards would apply	Usu would apply Wandsworth/Richmond/Merton – some refer to commissioning alliance for Temp Housing. Give standards for TA with/without cooking facilities. Think without its 6.5sqm, with its 10.2.
Are we above	Yes.
Go to OR – B1. – on first page, descry. Anything stand out	Ref. to student accom blocks, from plans I've seen its hostel units. Student prob incorrect
Did plans ref. to students	No
Have analysed historic info composed for this planning app	Correct
Section 6 – 2 nd to last page response to KC opinion - ... it is not possible to say if occ level would remain similar – agree or disagree.	Would agree with that
Up one para – Wandsworth AH update – when compare that to this from planning /arch point of view – comment?	Comment is that there is an opp to reinvigorate existing structures to create over 200 pieces of TA. Comment is that

	there is an opp to refurbish to bring to life and provide this.
Looked at historic deemed consent – onto next pag, would you agree with statement that renders hist use irrelevant. Is there any evidence that the use has ever been abandoned?	No
Had a look at planning info next para 8 – ref to PDL – minutes of plannignmeeting – no objections s/t highways maters	Widening footpath
Is this relate to conditions/restrictions being imposed	Not to my knowledge
Go to section 8 – para starting 'permission for the dev...' agree with this?	Agree – strongly with this in terms of hostel accommodation.
If go to drawing on table F2(p57) is that similar to drawing at p.8 of del rep	Yes – not totally clear – but looks same
Screen print has no serial no	This is why can't tell
Next page (pdf. P9) – re KC's opinion para 3...'. Is it more likely than not that descry ref. to hostel than student	Yes -t hat is true.
Go to pdf.p 14 – hw and trans – is this true or not true. Small CP area... etc.	No, there is more parking than that. – substantially more – there is lots of hardstanding.
This doc is a decision notice – we were refused planning – do you disagree that it has 5 parking spaces	Correct
Last few lines – you mentioned done hostel schemes – last sentence – nature of temp is that likely to move in at short notice. Unclear how many will have cars...	No, not to best of my knowledge. Everyone's situation is different. People operate in different ways.
Do people move in and out of accom like statement alludes; do they own cars.	
In rpeviousu schemes have you put in parking/know nay parking probs	No
Have you designed TA schemes with car parks	No
Never been a RfR that you are aware of	No
Agree with... top of next page?	Have taken P trans and driven to site
How did you get there	
Particularly poor access?	No. First time train and bus, second time drove and parked
Have you felt threatened there/found it particularly deprived	No
Any sign. Reason someone living there would suffer from high level econ inactivity/unempl due to not being able to leave area to go to emplo	No. Fine to go there and fantastic view of one of our best parks
Next para – 'for purposes of this app...' – give opinion. Ever come across LDC where retrospectively judged against current standards/judge against space standards	No, because it is for existing use, this is an upgrade. Asked to upgrade in order to not require planning

How critical of concl... 'has provided docs....not provided final DN'. In absence of DN, do you think it has not got planning. Is it fair to criticise us?	Its going back a long way. There are plans, correspondence, those plans have established. With absence of DN, its unfortunate, but clearly built as historic plans
Opinion that deemed consent happened	Imagine so, because it is there.
KCs opinion... (same para) – agree?	There is no DN, so no conditions that we are aware of.
Go to NTA statement of case C1 - 2.38 Agree occupancy level remain similar	Yes
Could existing rooms be more than single occupancy – any docs about a different occupancy number	Could put in anything, but in terms of scale; its pretty similar to what proposing. There would be a slight increase.
ST proof 2.4 – on balance of prob do you think this is MCU	No. in my prof opinion, from what I've seen
From design/arch point of view same use?	Same footprint, same design. Could be done in a no. diff ways, my proposal is not nec part of this proposal.
4.3 – mentioned that scheme not proposed, not a planning app – not a material point in this LDC.	No it's a diagram to show how spaces could be converted, but not nec this is how. [SV??]
Any evidence that this use should have been described	No, its an existing use, so its not described.
Go to 5.12 – this para refs SoCG/15 – 'proposals not likely to exceed 400 places etc. – assume ref to 240 rooms in hostel accom	Yes
Would that accom compare	Yes – my proposal is a proposal in existing floor plate. Could be done other ways
5.19 - this is the drawing we have tabled?	Yes
5.21 – could you look at the plan and say: Do we agree no physical measures (eg fences, access roads etc) to separate the buildings	No
All with diff but related purposes -	Correct
What is the related use	Rec. facility/ancillary
Ancillary to what	To the living – washing clothes/dining
What is the main purpose of the site	To have accommodation to live.
Living accom on that plan marked as what?	Hostel
So related purpose is	Hostel
Where does it say that plan refers to oc of site by Garnett Col?	Not aware that it does [approaches table to check answer] No
Read legend	LCC architects depts, Mount Clare See photograph.
If you were drawing a modern dwg, what would appear in the legend	Address, drawing, project name
What do you think is the project name	Garnet college, mount clare
What is the client name	Also London CC, architect to Council
Is client LCC	Probably
Address is?	Mount Clare
Where does it say 'as plan ref to overall oc by Garnet Coll'	It doesn't.

Statement also made – ‘contains bulgs that also have an educ purpose’ where on plan	No evidence on that plan – it’s a block plan. Nothings saying lecture, classroom, educ etc.
This whole para is based on that dwg -	No label anywhere of educ use.
Stated that for related purposes?	Hostel/licving
You said no physical measures separating	Correct
Sentence - 5.21 – does not support view that bare hostel use... can you analyse that sentence and give view	Clear that buildings are labelled as hostel units. Clearly one site, no separation, no labels about any educational use. No drawings of classrooms/educational purposes etc. Ref to Garn Col in job descri, but also notation of architect to the Council. So no particular evidence that this drawing demo an educ purpose
[NB to some extent, witness may have been led to these answers – his initial reaction was that GC may have been the client, and Mr G tried to steer him towards slightly different answers about their involvement. He's now reconsidering his answer to a degree]	
Next bit of sentence 'do you consider this a single planning unit	It's a single site
Next page – did you visit DH	Yes, last time
Have you seen any evidence that they are a single PU	No
Have you ever seen an app for 2 sites this far apart	Would say DH not on this plan, because further north, off the plan. Walking distance from the site, sep by series of other buildings and parkland. IN this scenario, if 2 sites, today, would probablly make 2 separate planning apps given that they are not adjacent
What is distance – at a guess	A good 10 minute walk
How far, if you could estimate	½ km, may be 1km
Have you ever done an application for 2 site that are ½ a KM away from one another	No
Have you ever seen one?	No
Touch on 5.22 – Comments on MC/DH – have you looked at DH planning	Not in great detail
Do you think MC in housing or educ use	Housing
5.40 – letter from LCC to Garn Col, providing an update on works. Read the tiaitalic words	(reads)
Why would LCC educ write to Garnet Col – what does this resemble	Suggests LCC are preparing the site for oc to an occupier.
What role are LCC playing	Client developer? Owner occupier
What would Garn Col be?	Tenant of some description. That's how it reads.
Go back briefly to 5.21 – how do you think Garn Col would be tied in by a doc written a year before this?	Suggestion, inference is that the project job was a project entitled Garn Col, MC, but the developer constructing, design was a

	separate client tied in – potentially being the Council.
Dates referring to – in modern times, what would they be referring to – (5.40)	Saying when spaces are being available. Suggesting is that I've prepared a site for you to come and take occupation.
So you had a survey undertaken, it correlated?	Yes, correlates with the original
5.41 – appears work commenced... Indicates permission achieved prior to this	Drawing in front of us is date 1959.
So this sentence indicates the work was carried out/not carried out?	Dwg is year before
If 5.41 is correct – what would that imply from a planning point of view?	The drawing is dated 24.09.1959, which is the year before. Not a construction plan. So if it was part of planning app would need series of technical plans before construction.
From CAD drawing – do you think planning implemented	Believe what is shown on 3020 marries in to what is on site now. So if that was the planning plan, it was implemented.

Adjourn 11.50-12.05

P27 5.45 – any paras that concern you	Reads...
Anything changed in arch/design	Not to my knowledge
6.6 - should this be assessed as an HMO?	No, that is a nuanced field – not relevant
This isn't an HMO	No it's not. HMOs are quite complex
6.9 – not any office facilities/dining block.	There are office facilities within PH and dining facilities
So, your proposal – even though not s/t to this appeal – go back to your presentation	Proposal was to introduce, kitchen/communal areas bin/bike stores in basement. GF to remain untouched in that regard – just upgraded to modern day
So fair statement that no office facilities in dining block	Facilities for the 15 blocks [what]
What is their function	Facilities in PH – large facilities, dining space, office space [your proposal or existing] Both Proposal is a suggestion of refurb improvements, but as existing.
6.24 – planning unit – is the planning unit DH/MC together or MC House?	MC is a site in itself in that new buildings from 1960s are similar/predominantly identical. All within 1 site, 1 boundary. Every drawing that I've seen is similar – and indicated on block plan. Not seen any dwg that represents DH and MC united as one.
6.32 – in my view... facilities are not ancillary... do you have an opinion they are ancillary to one another.	Opinion based on site plan itself in that each individual building does not have its own individual/private connection to the street.

	<p>Navigation/internal routes are all via each other. Enter existing spot outside LB, and buildings connected by ped paths through site/gardens.</p> <p>At no points directly linking those paths to Minstead gardens. So must go through the site to get to block A/B etc. They are not independent of access.</p>
Have you ever seen evidence that MC ancillary to the accom	<p>No.</p> <p>In terms of MC Hs – no – it is an empty building that had a conduit installed for desk spaces of some description, but every time it's been empty – evidence of some sort of intervention of office space/used for offices.</p>
Re 3020 – would MC have been ancillary, what use would it have had	<p>Again, all buildings, MC hs serves as pivot for want of better term – all paths lead to MCHs. That and Pic House – sunken courtyard connects PH and MC Hse. Very distinct hard landscape connection between the 2. They are gateway – can't get onto the site without jumping fences, etc. without going past those buildings.</p> <p>Very clear that MC is part of the overall site and is an entrance building to the site.</p>
Table 1 (p49) anything from an architectural point of view/plans point – is there any different	<p>If asking whether laying out for students/TA, wouldn't approach any differently.</p> <p>If brief was to upgrade to more appropriate standard/better facilities. If TA/Student, no different.</p>
6.54 – you've been to site, reviewed plans, etc Do you think there will be an increase in noise	<p>Not drastically increasing noise levels. It's just a proposal of how one might do it.</p> <p>So re noise, not that different in occupancy, so would conclude that noise levels would be similar.</p>
Have reviewed pl. docs/plans. Onto s7.1 – Agree/disagree a) where have you seen educ facility	<p>Not seen any labelling classrooms/lecture halls on any dwg I've seen</p>
Disagree/agree -	<p>' comment at 'a' not clear whether this is referring to of-site or on-site.</p> <p>On site – have seen no plans; in terms of places to learn, are a mix of uses.</p> <p>Any educ facility therefore off-site</p>
On -site – what is that use	Places to sleep, eat, recreate.
General use is what?	Accommodation
b) from an arch/plans point of view – seen anything that indicates training coll/HoR?	No evidence lecture theatres/spaces to train
Physically on site	Not on dwgs. No
Connection DH/MC	Not seen a plan that connects the two sites

Seen anything that permission would have been prescribed	Not that I have seen.
c)... from evidence you've seen is entirely site a hostel	Mix of uses that could all be used for hostel use – bedroom, laundry, living, dining, break out spaces
Any evidence that 1960s dev was abandoned and replaced by UoR HoR	Plan before us has been overlaid and in terms of block plan form it is the same
Internal changes – have they shown that UoR has abandoned the hostel use and replaced it by either an educ use or student housing use.	Not that I've seen. But now there is evidence of communal use of PH through labelling of rooms and spaces.
KC opinion – C1 – p 66 – paras 35 Agree or disagree with this	Agree
36	Agree – they are both <i>sui generis</i>
37 (except appeal section)	My feeling is that the proposal of the existing use vs. what I've found from looking at the drawings, I would agree.

XX

You are the architect – do you have any planning quals	No
No legal quals	No
You put together some refurb proposals, are they the same for the MCU app	Yes
So you were architect for that	Yes
Understand from yesterday, some works already commenced	Yes
Presume that work not being done by UoR	Don't know
Is it being done by AKA	Don't know
Has UoR relinquished remaining lease	Don't know
Give overview of refurb proposals on p 13	Yes
You said one way to refurb	
Many ways to skin a cat	Yes
Even if these proposals done, in 10 years time another could do again	Yes
TA is a broad description?	Yes
Nothing in LDC requiring it to be used for homeless	No
Could be privately paying residents	Assume so
TA is not a term of art – no planning def	No – <i>Sui generis</i> use class
For TA – re layout – could be any manner – could be dorms with bunks/ other things – a spectrum	Yes
No requirement for any communal facilities at all	I guess not.
So if we go to P13 – refurb overview – start with the bungalow – no floor plans?	No
Delipidated, prev use as far as we know single dwellinghouse	As far as we know
Known labelled as principle dwelling	Yes

Restored to provide TA	Yes
Maybe a s a 4 bed	Potentially
Could be 4 bed/2 be units	Yes
MC House – give the use as offices. Said in EIC that there was no evidence that ancillary to anything else	Not that I've seen. Its an empty buildings, empty buildings. Evidence with conduit might associate as office
And heard Mr Mills visited it as an office	Yes
You're not proposing /this proposal does not inc. anything for MC.	No
So LDC would all become TA	Yes
Re use – planning use would be confirmed as TA	Yes – across the board But would still need LBC.
Planning use gone from office building that MR Mills visited/ you say no evidence ancillary to anything else. Lawful use would be confirmed as TA	Yes for the site- but you wouldn't be able to start partitioning as bedrooms etc
MC H in app site	Yes
App for single TA use, whole site	Yes
So where currently (if not ancillary, must have a mix of uses) site would be confirmed as single use [these are Ms Hutton's word]	Not sure how to answer that. Building is empty and has been used as offices. Whether ancillary or not, is unclear
You said EIC not evidence that ancillary	No evidence either way. Whether ancillary or not to site itself as to how site would function. Don't know.
Do you know what ancillary means.	Legally? No
When you say no evidence ancillary, what did you understand this to mean	Not the primary use
No evidence that secondary or subservient	Feeds into or works with the use. Its not separated.
Ordinarily incidental to?	Yes
Turn up ST appendix A. UoR has very large campus/large no. of facilities it owns	Don't know specifically
Go to ST – all coloured buildings part of UoR	Yes
So dep property and FM, would expect it to cover the UoR	Don't know.
Deal with more likely than not – Dept property and FM – do you know sqm of MC H	Don't know
Think roughly 1000 sqm	Would have to check
Look at ...list on lower GF/FF/FF – more likely that no that this is serving UoR as opposed just student bedrooms	Speculation – I don't know.
Saying equally likely that would have U Groudn and Mgt team/ head of security for UoR as for 200 student beds	Don't know
Can note that it is dept Prop/FM	From photo
So Uni Head of security. That's not for MC site, not MC site.	Yes
Dom serv – not MC site -	It says univ.

Grounds and WM – for uni, doesn't say MC site	No
Have you designed student accom	Yes
How many	2
Where	One in Feltham
And	In Camden
How big Feltham	Can't remember 100 and something
Camden	Similar
You didn't presumably design, with them, an office block containing FM etc	No
Fair to say, not ordinarily incidental to student accom	Don't have to have these uses for StA
Building StA for c.200 beds, would be surprising; not ordinarily incidental to provide an office building of this type	Repeat...please
Both budilngs you've been ivnolevd in haven't included this type of office building	No
Surprising if someone said my 200 student need 1000sqm office space) may happen, but	Might to
In your expericen	Hasn't been the case
Mentioned internal works would need LBC, but LDC would give the lawful use. So if LDC confirmed, it would become TA. Wouldn't need LDC to change, just physical works	Yes
No reason why a scheme couldn't be drawn up by this/other owner for to convert this to resi	Would require LBC.
But no reason this/other owner couldn't do that	No
Miss Cooley said could be addl resi/communal space	Yes – subject to LBC
You have said that this would be a staff mgt/admin building	Yes
So would be ancillary to TA in your proposal	Yes
Miss cooly said 1-5 staff likely Between 1-5 staff won't need a builgn the size of MC house?	No
If sqm is c. 1000 sqm how many units could that provide – dividing 1000 by 12.5, would get...	Not going to happen
Might get 40	No – way building laid out – staircase huge chunk/2 principle rooms at rear, would not get permission to subdivide. In fact v. little scope to subdivide Planform is [sacrosanct] usually
So plan would dictate no units	Yes
PH – re staff accom – are you talking about use by UoR -	
Think UoR say staff	Don't know

Garnett?	Don't know
If it were used for staff accom for Garnet/or UoR, the purpose of that would be for lecturers or staff who are working out/employed by Educ Inst to give them some housing while teaching/lecturing	That is one scenario
If it was used by staff – that would be staff of either UoR or MC – who needed accom, presumably while teaching	Hypothetically
The staff accom wouldn't then be ancillary to student accom	Hypotehtically would or wouldn't – either, it's a hyp scenario
But if ancillary to anything, it would be ancillary to UoR, not to the st A	Could be an on-site warden
So if a warden tasked with security, then could be ancillary, but otherwise prob for the Unit	Probably
P14 - these are existing plans	Yes
We know that GF has CAB in it – do you know how long been there?	No
Pointed out storage, couple of parts you've not been into, empty room, some offices, reception kiosk	Correct
Don't think in UoR evidence, they ever give a use for GF of PH	Haven't seen anything – don't know
On FF, have staff accom – as pointed out, serioes of various units with various diff bed spaces. [no question asked]	We don't have one no,
Don't show a proposed FF	
Counted in accom schedule	Yes, on basis of existing
P15 – ext/proposed basement – this is 1 way to skin a cat – TA doesn't nec inc com facitlies [no question]	
GF – at moment left untouched, but if lawful use confirmed as TA, then no reason entirety of GF couldn't be resi.	In theory.
Its not listed?	No
So could internally reconfigure it – to provide, eg. 30 to be similar to upstairs	Presumably.
We don't ave the size of these units on FF – some beds bigger than others	Yes
So no reason some could not be double occupancy	No Although not gone into details
No reason, eg if children, couldn't be bunk beds	No
Turn to student residences – p 17 – and you are saying many ways to skin cat, but proposing GF 6 1bed and 1 2 be	5 1bed, 1 2bed
You've marked as single bedroom, but no reason that couldn't have double occupancy	Yes – same as for existing block. Existing could have multiple beds, as bigger without the ensuite

Owner could put in double occ/bunk beds	No reason why not, in one scenario
P 18 – same applies – re principle – double occ/bunk beds possible	Yes
No evidence before inquiry about student accom ever being in double occ	Not that I've seen
I think some of PH does have (eg p 10 – has picture of a small double), but every pic of student accom has been single	As far as I am aware.
P13 - - lodge excluded from application. Think mean excluded from your proposal	Yes
But part of site covered by LDC	Yes
P28 – summary of reconfiguration – bottom RH corner. Have existing 180 1bed units	Yes
4 2 bed units 3 2 bed etc...	
Your proposal is 135 1 bed 49 2bed units (so 98 people in 2 bed units) 1 4 bed unit 1 5 etc. etc. So broadly half of the occupants would be in 2 bed units or greater. 98+4+5+7+8+4 for the bungalow) = 126 So assuming single occupancy – existing 180 people in 1 bed units Proposed 135 in 1 bed, and 126 in 2 bed + units =261 overall. (doc don't always include bungalow) 1 way to skin a cat	Follow maths and happy with it – its one way to skin a cat
Assume single oc – and also excludes GF of PH and MC house, where addl accom could come forward	In theory.
Normal to have single bed student accom	Yes
Wouldn't have expected student accom here, where oc by students, wouldn't expect it to be occupied by HH (couples or families)	I don't know how to answer that question
Well know every room has single bed; etc. as an architect, wouldn't expect occupancy by couples/families	Wouldn't expect it; could be theoretically
Agree your proposal or any reconfig of site could be done a number of ways -	
No reason TA couldn't occur in self contained dwellings	It could
Eg take PH as an example – First floor – no reason why that couldn't be configured to a series of self contained dwellings.	In theory could take bedrooms out and create living spaces
A studio flat is a self contained dwelling	Yes

So no reason why couldn't have studio flats/ensuite/small kitchen and they would be Dwellinghouses	Yes, as long as met requirement that not just kitchenette and could allow cooking a proper meal
Where in def. of dwellinghouse requires a larger kitchen	Re using standards??? What is question
Def is dwellinghouse is in ..(gravehsham) Doesn't have separate living area – but has bedroom/bathroom etc. so studio flat can be DH	Yes
Nat descr. Spaces apply to studio flats	Studio dwellinghouses – yes
A studio would be a 1 bed 1p/2p – so either 39 or 37. Etc. 50 for a 2 person	
So within the scope of the LDC, could be studio dwellinghouses could be provided	Dwellinghouses no, TA yes – not C3
TA is a broad use, and miss cooley said can be in other uses, why can a Dwellinghouse not be in	Because site is sui gen, not C3
TA just means accom that is not being used temporarily. Could be a variety of accom solutions – why could TA not be a dwellinghouse	If you have a dwelling as C3, that might be possible to use temporarily, but turning a sui gen use to C3 would need PP
Lets say these were laid out as per your layout. What is it, that means these are not dwellinghouses	The use class of the site
In terms of physical characteristics – what prevents – given that dwellinghouses.	
[is there anything in the 15 blocks that prevents them being used as a dwellinghouse?]	If were to propose a Dwellinghouse, would not comply with space standards
But nothing in the LDC descry that requires any type of space standard to be complied with	No – used guidance of commissioning alliance
Say a new owner comes along and decide to lay out the site itself contained units that have bathrooms, small kitchens – they are to all intents and purposes dwellinghouses – wouldn't have to meet space standards	No, but wouldn't be dwellinghouses
Why	Because use class is C3
Why can temp accom not take place in Dwel	That's not what's happening here
Why would C3 dwleelinghouse used as TA be MCU?	Understand that TA is sui generis, so using a class use
Not necessarily. Are you pointing to something materially different in the use	
[Mr C is struggling here – maybe you just need to make submissions]	
Would you agree that, generally students would have other residences	Maybe
In general?	Students come in all shapes and sizes

Where a residence is a persons main place of residence – necessary to ensure have facilities for daily life	Yes
No space standards apply to StA?	Not entirely sure
What could happen here on TA use – could have 0 communal facilities	In theory
Your flats would be about 1/3 NDSS – might be ok for student there in term time; has somewhere to leave there space – dif for someone who this is only residence	Could conclude that
Parking – p24 – marked out No. parking bays – only 5 are marked out aren't they?	Tarmac in quite bad condition – there are definitely markings of more than 5
Where –	Front MC and to side
Not by Picasso	
Here you've marked out 52	
Outside/inside app	On Minstead gardens – no, some are on site/ some off site
For SV.	

Lunch 13.30-14.30

Procedural intervention:

I've been thinking about this mornings evidence over lunch, in particular the discussion about the accommodation layouts and potential future uses, including the potential for a C3 use – depending on how any future user might choose to skin their cat.

However, it appears that this difficulty might be arising from the way that the use is described – and you will recall our somewhat muddled conclusion on that matter.

I keep thinking that the use applied – clearly stated on the application form – is for a Hostel. The covering letter adds colour to that, by saying it is for Temp Housing. That – ultimately is what the appellant wants (whether by express permission, or confirmation through this inquiry).

What seems to have happened, in dropping the 'Hostel' from the description is that it opens a myriad of permutations of temporary accommodation. It may be wholly imprecise as to what is being proposed. Either term – Hostel, or TA – is unhelpful and vague by itself.

Now I know that Ms Hutton said yesterday it is important that we establish the use being applied for at the outset. I raise this now, because I don't think it significantly affects yesterdays' evidence and you are still in the middle of XX of Mr Curtin, so you might be able to add to your questions if you want – after adjournment if you want. Or it may just be something for submissions.

I also don't think it changes much in terms of the appeal – we still have to deal with what was permitted and the material differences, if any, in uses that have followed that and are now proposed.

It is customary for an appeal to be determined on the basis of the application as described on the original application form, not some other description that might have been chosen by the Council. So I invite you think again about whether the description of dev should be as a

Hostel for Temp Acom – **and I'll invite you to give me submissions on that in due course.** Meanwhile, you may wish to question witnesses on the basis of that possibility.

Unless anyone has anything they want to say about it now?

[in due course check app docs]

Ms Hutton

I asked yesterday – and got a clear answer that for temp accom – that is also the planning app that was made and the basis on what Miss C was examined, but q's would have been different – it focussed on Hostel use. So poss prejudice to the Council.

[did you deal with a scenario where a hostel use could not be proposed]

Will have to go over notes – was v much focussed on temp accommodation. Can't give a fir answer now.

Mr Gillick

Prefrence would be an option a0 and b) –

1st as presented

2nd as hostel for temp accommodation.

Or whether more clearly define sui generis as 'hostel'. And that is what Miss Cooley's evidence was about.

Extensively using the word hostel in all our evidence – I'm happy with each.

Handed an email in F2 – p9

In our case, we think that hostel and TA are interchangeable. We think it is solely on a hostel use.

Ms Hutton

Looking at app cover letter – because LDC app is made this way – p.1 LDC is sought for change to temp housing not need pp. App seeks to determine – etc. hostel to temp ho. So saying lawful use is hostel – change to housing.

App is very clear that change is temp housing – that is what is sought.

But hostel is not a defined thing – courts say many different sorts; so that is also imprecise.

Looking at app form

Mr S

On registration – form says hostel – on registration letter. Descr. Changed fundamentally on day 1. To 'COU from student accom and associated use to temp housing Sui Generis.

Miss Hutton

8 July [F2 P7] – A → C legal advice – please revise to ‘confirm proposed use for temp housing’ would not create a MCU. – so positive request from the appellant that this is the basis to decide the application on.

[and of course, F2, p9 where A confirms the same, and comments in opening to the same effect].

[will come down to my Qs in due course – to Mr S and Ms T – as to whether temp accom is a definable thing].

Ms H

Think if its on the table that the description will change – will change approach to Mr Sahota.

[may consider either/or approach?]

[can you conclude Mr C]

Yes.

Mr Curtin – XX ct'd

No part of your evidence to compare one hostel to another	No
When ref to application, were you referring to this app, or the MCU planning app	This app
So MCU was for change away from St Acom -	Don't know
This is in C13 – the DN	
Before lunch were dealing with MCU – in your view would an HMO be a materially different use	Yes
Hotel would be materially diff to HMO and C3	Yes
You say this is permitted as a hostel use do you say if it was a student HoR, if was change to housing for homeless would it be MCU	It would
We are dealing with whether the use has a different character	Yes
You deal with planning apps	Yes
If you were to make app for HoR, how would you describe	As ‘student halls of resi’
If you were to make app for a new college – how would you describe	Have never submitted, but would assume would put a use class – wouldn’t be sui generis But not done, and so don’t want to answer
If you were to make an app for 10 resi units, that is what you would describe?	Resi dwellings, yes – and the number – and prob mix too.
So descry is where you describe the use you want to use the site for	Yes
And if get RF or granted, assume LPA hasn’t hcged it, you’d get pp for what you’d described	Once implemented

If it was eg HoR, no change , then lawful use of site would be as HoR	
Your pp would be for HoR	Yes
So you'd look to descry of dev to say what lawful use was	First port of call yes
If had pp for student HoR and there was a plan that showed that layout/block – but didn't write HoR – or had no descry othe use, lawful use would still remain as the descry of dev – (i.e. plans don't need to say HoR for plan ot be HoR, because that is in descry	Technically no. but assume LPA would want to have text to describe what those spaces were
But wouldn't need to write on plan student HoR to know what pp for	No
Primary purpose of plans toshow what you can build, operationally	Yes
In EiC – agreed that would be a deemed permission for this site.	Yes
Think A case is if deemed pp, would be no DN – are you aware of that	No
Agreed pp would have been deemed – why say that	Because presented with plans, visited the site and looked at plans and existing they reflect those plans.
What do you understand is meant by deemed pp	Understand that if used as that usagage, its deemed that consent over a period of time.
So saying would have been a pp?	No not saying yes or no Don't know
Will explain deemed permission – under TCPA in 1960s, and now are certain scernarios that pp can be deemed to be granted, effectively without an application	Ok
Were you aware of that earlier	No – misunderstood
So in your view, deemed permission means...	Established use
OK	
So not making any comment on whether a pp here or not	No
In your evidence, gave your view on a number of things. You said MC and DH would not have been part of same planning consent	Not from what seen
Likely use permitted would have been simply as a hostel	Yes
Do you mean not as students hostel or HoR?	Although hostel might come in many different forms, don't want to define that.
If hostel units were likely use – are you saying that in descry it would have said hosterl	No – saying from drawings I've seen it says hostel.
So nothing you have seen that leads to believe would hav been hostel	I've not seen descry of dev.
Then said site remained in permitted use ever since. Hostel use and remained	Seeing drawings, and having visited site, it appeared to be unchanged to best of my knowledge.

Think you said hostel dev by LCC – without an intended tenant – not clear what was suggested. What is your position, was Garn always on the cards	No idea.
Please go to F2 – doc 10, p67 Have you read all these	No
When said pp for hostel, just based on plans	Yes
P 67 see MC use for educ purposes – educ cttee/housing/TP cttee joint report. Para 6 – most appropriate use for Garn. Col. Basically MC proposed as a new site for Garn Col Is that right?	Ok
So at this point – the whole college would go onto MC	
Then go to doc 14, p77 – final para, approve proposal for transfer Garn C to this site – suggestion to use site jointly with DH. [what does this all say?]	Ok
First suggestion that use the sites in conjunction	
P 79 – LCC – MC and DH – 2 plans A and B – Plan A DC for training Col, Plan B proposed for hostel accom for trainingcol students.	Yes
No diff to hostel accom for training col students – same as HoR?	Don't know
Is it difference? (materially)	No
At para 3 – see MoE – in same doc using HoR interchangeably isn't it	Yes
Doc is being proposed for students Garnet Col	That's what it reads
See recom para 6 - ...reads... training col and student hostel purposes – now a 3 rd term, but no dif students hostel, accom for training col students, HoR	Have been used interchangeably here
Doc 16 – TC minuntes Training col/hostel being used interchangeably – fair?	Fair
P83 – dated LCC plans showing hostel units. Here is first plan – Garnet col – first plan. Have Garnet Col MC – in legend	
Silent on use of MC house – have PH as staff and dining block	Pixelated
Reading fairly, this is hostel units as part of the college	It says Garn Col in title
Known how terms are interchangeably Reasonable that hostel is being used interchangeably	Is one way of looking
But in context of college, we can infer that words are effectively interchangeable	NO ANSWER

In EIC – plan similarly says Garnet Col	Yes
Said no evidence edc use – but college is an ed use	A college is
Plan on table – principals house – something you find at a college	Potentially
So looking fairly/reasonably – what looking at is a college use	Not nec – this is a block plan – no detail on the plan
Plan not describing the use	Labels of blocks, but lack of detail of plan isn't
But know, reading as a whole, part of college	Reading plan as a whole – yes
Reading as a whole, hostels would be in educ use as part of college	Slightly – not sure how to answer the Q
Agreed this is a plan for a college	For an org called Garn Col
We know it was a teacher training – happy	Yes
Teacher training col – if hostels are part of the college, they would be in educ use	I don't think so, if part of Garn Col as an organisation, doesn't nec mean euc use.
So been through evidence training col – you are saying these could be backpacker's hostels?	No, hostel units – backpackers hostel is not what they are described as
Agreed this is one planning unit	Yes
Know the planning unit is the MC house of Garn Col	Yes
If the client came and said – goody I've got PP – to use those 15 blocks as a backpackers hostel – that would be wrong?	Not obviously wrong – because point of all being here is what is use of site
But going through historic docs – plan shows college – one planning unit	In that scenario, would say drawing is hostel units – would say hostel is a broad term, what does that form in a broad term
Have to look at plan as a whole	Yes
These are part of a college is only reasonably reading of that plan	They are part of a plan that is associated with Garn Col
Well it is Garn Col – on 2 sites –	No that's not my evidence
Is it seriously your evidence that could look at this plan for a college and say you could hive off those units as a hostel and use them separately as a backpackers host	
So noting use of hostel used interchangeably – looking at plan fairly – those hostel units are in educ use	Educational use is difficult.
Ok – part of garn col use	Yes – ok.
Doc 18. P86 – Talks of Garn col and its new HoR – confirms that were HoR/hostels that were part of college	That is fair
Recom – training col and student's hostel to replace extg Garnet Col	Ok
After 1957 – when proposal just for MC, when DH came into the fray, always discussed together	Yes – seem to be
Anything materially dif between any of the plans?	Principals lodge has moved

But re descry of Gan Col/labels on buildings.	No
Doc 21 – p.93 – headed MC/DH Wandsworth. First para is detailed scheme for adaptation blgs and new blgs – by May 1960 have a detailed scheme – have a recom – 6A cttee approve scheme as shown on drawings 1-6 second set etc... 20 plans	
[is it necessarily that]	
Point is that it is more than 1 - would expect that	OK
1 scheme across 2 siters – fair?	As described here
Doc 22 v similar – same recom	OK
See funding coming from finance committee/educ committee.	Yes
Doc 25 – p 100 – TC cttee consulted on LCC proposals – have ref no – MC/DH – slightly dif descry, but discussed as one scheme	
So go to educ cttee report – at p103 – last para – view to redev redev to training col with HoR - @ p 105 ...reads... First ref to what MC doing – DH admin office..etc	Hmm
Doc 27 - study bedrooms – as opposed to other 'hostel'	Ok
So MC is common rooms – prob ancillary or part of college?	OK
Even if those documents – is MC in 1960 did it have an office use?	Not on what we've read
So if correct that MC H used as offices by UoR, then incorrect to say that site has been in same use since 1960s -	Doesn't expressly say not used as offices
We've got student common rooms	We do
No evidence that this is the use put to by UoR	No
Fair to say use as offices – not ancillary – Current use is a mix – materially diff to training col permitted in 1960s	Yes dif to what we said
Be esp no evidence of an office use	Not from what we've read
Accepted st acom to temp MCU – diff character	Yes
Change hostel to office, clearly material	Yes.

IQ

All answered	

RX

To carry out the works in your doc would you need B Regs	Yes
Fire regs	Yes
MC House need LBC	Yes
So not free to do whatever you want	No
When did SV, what is happening in MC H	Nothing – empty
Vacant	Yes
Can you pull up E8 Does that photo say anything that not for MC campus	Not specifically
Calling off headings... Could env team work on the 208 rooms and buildings on this site	Yes
Could MC meeting room be used by this site	Yes
Could hospitality room be used	Yes
Accom Finance Etc Etc	Yes to all
Project's team	Don't know what it is
Others -	Yes (all could be used)
Does anything here indicate sole facilities for UoR – Say that is the	
Could there be other uses in MC house that are not on the sign?	In theory
Date of photo	2014
Mr Mills said yesterday – that 2008/9 MC house was vacant – between 2009 and 2014, this building became occupied – is that corrected Have we any evidence that the use indicated i.e. office use continued for period of 10 years	Not in this photograph.
E9 – [check this is not new evidence] – no Back to E8 – can you see that in in E9 -	No
Can you see it in next photo – no	No
What does that suggest	That the sign has been taken down – 3 years/4years later. So suggests that there has been a change of some description.
Was mentioned MC H could be transformed to many hostel units – what listing is it	G1
Scale of difficulty	Very – to subdivide – grand rooms/staircase – would need to protect all these features – skirtings/doors/planform to chop that up is almost impossible.
Ghov get kitchens in	Struggle because need to punctuate fabric
Bathroom	Same answer – services difficult – running through existing cornices/partitioned ceilings – complicated – esp in G1

So enarly impossible	G1 LB app – to disturb original features (eg...) extremely difficult.
PH – any indication that on any plans, is any info about who can live there. Anything to say only staff	Not from what I've seen – anyone could live from plan form – bathrooms/bedrooms/kitchens
PH – 1 st floor – proposed/existing are the same	Yes in my notionalal cat skinning.
From arch/planning perspective, to carry out your works on building, do you need pp	No
so is the occupancy question relevant when you carry out the works	No – because within the realms of not disturbing the envelope, and proposed mods – could do so without planning because all internal and don't externally manifest
So your presentation is a proposal	It is – could be many
Does this rely on a LDC	No
Is occupancy any different for students vs adults	Adults can be students/students can be adults
On occupancy – single/existing figures my Ms H – to get to that position, do you need planning permission.	No because we are in this context?
[are answers based on use of site not changing]	Yes
If FF PH became series of self contained DH	C3 dwellings – yes.
What you've drawin as student accom would this be their main place of residence	Don't know Students could live there exclusively, may not – lots of dif shapes and forms
Not staying with friends/fam	May do – students now lots of shapes/forms all over the world lots of dif living arrangements
For homeless people, would this be their main place of res.	Reflect on AC evidence – might be .insome scenarios
[VH interjection re trying to get change of mind]	
Re space standards used?	Was guidance – in commissionaing alliance
F2 – won't go through everything, but general flavour	No, its notes from SV
Refusal notice – OR – B1 – con page p 16 – last lines of 1 st para – fragments of a permission should be given little weight –	
Is 14 a planning document	
Go to p 79 – 2 things – is that planning doc	It's a report to sub committee
Id's 2 plans p	Plan A DH Plan B MC
Anything that combines	Just plans A and B – 2 separate sites
P83 – is that a planning document	It's a plan -
On that plan – what is serial no	3020
Does Label Garnet Col say anything about the land use	It indicates that it was part of Garnet Col, but the actual usage – its doesn't say anything

Would you say GC says nothing more than...	Says that it is associated with Garn Col as an organisation, but the block plans does not give any indication about the use of these sites – doesn't say anything other than what the labels are.
[stopped and rephrased leading q - Does the wording Garnet col say anything about the use site put to]	
So ref to plan on the table – education use on this site has been mentioned, can you show on plan where edu use specified	No - b because its coloured in blocks with labels
Is there anywhere an education space could go to	On these plans, almost impossible to say.
P93 – F2 – is this a planning document	Not that I would be familiar with – no it's a committee report. Not a DN as I would recognise one
Ctee report – can you read out who stamped it -	General purposes committee
Are DH and MC on one site	No
What is the general use of DH as you understand	Don't know – never been inside
Back in 1960	Was a college I think.
What was the use of DH back then	A college – back then
What about MC	Their residences
Do the words 'garnet col' transform it into a hostel	No, because Garn Col is the name of the organisation.

Discharged

Mr Gillick

Re housekeeping – we are willing to amend the description to something including hostel – no objection

[ok but I need to consider injustice to the Council]

David Lewis

EIC

Start going through proof – quals	Masters in Planning and engineering, etc...
Read on	Looking at material diff in last use and proposed TA use.
P 5 – have you been to site	Yes
Been inside	PH and a number of other blgs
How would you describe ped and motorists	Generally residential area, ped infrastructure, generally good. Footways on both sides. Minstead gardens 1 way, operates anti clock. Generally lightly trafficked. No parking restrictions. Availability to park in vicinity of app site.
Table 2.1 Pick out items make obs	Reviewed local amenities and facilities. Can see – a wide range of shops/services No cafes restaurants

	<p>Educ, schools, com facilities Health facilities – no of GPs, chemists, opticians, dentists Library and dentists</p>
So how describe	Very good – provide wide range and opps to walk and cycle to most
2.5.4 – what is the highlighted area	15 min walking catchment Legend highlights the various amenities in the previous table – shows a wide range. Many concentrated around Danebury Avenue Jct. with Roehampton Lane
Fig 2-3 explain, and possibly name some locations if you know	Cycling isochrone – from GIS mapping. Each ring is a subsequent 5 min cycling distance. Up to 30 min cycle Large area of local Wands area and further afield
2.6 PTAL – explain how calculated How sign is this?	<p>Method of assessing accessibility to P Trans Considers bus stops in 640m walk, train stations within 950m Looks at frequency and gives scale 1-6</p> <p>Fig 2.4 is from TfL website Part of site is 1b, part is 2. There are limitations re PTAL – solely looks at P Trans Doesn't look at foot/cycle. Also doesn't assess ability to interchange between services – so only looks at those within 600m/900m walk Doesn't look at bus to train or interchange between change. Should be seen as only measure of accessibility</p>
Is PTAL a fair indication of this site/s accessibility	<p>Probably underestimates Doesn't consider availability of shops and services – lots within walk/cycle Also doesn't consider interchange between pub trans So done additional analysis over travel time – esp ability to interchange. – v common in London. That anal is at 2.5. shows that quite a large area of London accessible within convenient time Putney – 15-30 mins Wimbledon, Kingston 45 mins Central London – Paddington/Westminster 45-60 min Tim Mapping is available publically from TfL. It's a TfL calc.</p>
2.8.1 – have ID where bus stops are.	Very convenient. C 140 min walk. At end of bus line – served by 170, 430, 639, 670, N74. Regular frequency to range of destination and connection to local trains

That's on P 11	Yes – summarised table 2.2
What is cheapest form	Generally busses are cheapest London Trans – walking/cycling even cheaper. And lots of facilities within walk/cycle
2.39.3	Nearest railway station Barnes – walk and cycle, also 430 bus – regular services from Barnes to Waterloo, Clapham, Wandsworth etc
2.11.2	Came to concl that genuine choice of modes of travel.
Section 3 – where do the plans come from	From proposal option that Mr Curtin prepared. Looked at existing figures for room nos. and that's where room nos from
	Assessed 208 rooms from current use – 28 in PH. There are 24 on-site parking bays + addl delivery bay.
Go to proposed use	Looked at option from Mr C – 225 rooms in blocks, 32 in PH, = 257 rooms. No change to access/servicing, so still 24 parking/1 loading bay.
You've done maths – 3.5.2 -	Concluded that no material dif in trans terms – to how site would be managed in trans terms
4.2.3	Element of rep – reiterate that wide variety of shops/facilities that users of appeal site can access etc...
Then get to lawful use cert app – 4.3.1	By looking at whether StA and TA both benefit from access to these low-cost transport options. Eg those in local area
How long a trans planner	About 18 years
Have you looked at many student ho schemes	Yes
How would then usu travel	Usu PTrans and walking/cycling – car use lower than standard C3
Would you expect car ownership levels to be low?	Yes
Temp accom – worked on that?	Yes
How typically travel	Walking/cycling P trans predominantly – lower car use than trad C3
Would you expect car parking and ownership to be low	Yes
Rest of report, largely compares the appeal scheme – Mr C proposal – back to 4.3 statement If we didn't implement mr C proposal and the units stayed exactly as is – one in student, one in temp would you expect difference	Not exact data for mode share of each use, but come to conclusion that not a significant or material change Even with increased no rooms under mr C proposal, conc was that impact would be material
No people that cycle different	same

No people that catch bus/walk/cycle/interconnect	Would all be comparable
Car journeys	Comparable
Car ownership	Comparable
Parking	Comparable
From 5 on – are we using no.s that compare situation as is, to Mr C increased accom	Yes that's correct
Section 5- tranimpact trip gen – tell me about trip gen	This is a method of assessing no. of trips. One of common methods is to use TRICS – basically a database of traffic surveys various sites around UK. If looking to assess trip gen, will review TRICS to try and find comparable sites for land use. Will filter based on accessibility etc. and try and find comparable sites
Nationwide?	Yes , f rom all over UK
Are trans patterns of London substantially different to rest of UK	Yes – generally accepted much higher accessibility and lower car ownership than rest of UK So when doing trics anal, usu use comparable location, so typically only used sites in TRICS in London
Some of tircs old/new	Constantly updated. Once certain age, try not to use – so usually up to 5 years Stays on databas for longer, until archived. Can still be viewed, but not recommended that has current validity.
Trics has id some surveys done during covid	During covid travel restrictions, traffic surveys still being done an duploaded, but database flags these and generally assumed that don't include these within data samples -
5.2.3 – reads...	None of the land uses within trics are comparable.
In LBW trip gen assessment 5.3.1 – did not inc full trics output reports etc.. but provided separately – What is the situation here?	When assessing trip gen info, by students LBW have used trics database to create a sample of sites. ID 3 sites in London – 1 st all are car free dev, with no parking on site, with CPZs and no ons-street parking. [mr L was interrupted and not allowed to continue here]
What are we looking at here – base case/proposed?	Looking at traffic gen in current passed use. So in order – 3 surveyd sites .
Do you have details of the site	Full details not provided in evidence , but were provide in email and appended to my appendix A . 2 nd page appenmdoix A – moving to 5 th title – lists PTAL of sites in Wands sample – 1 of the sites in PTAL 2, 2 in 4

	<p>So 2/3 sample in more accessible by p trans location than appeal site</p> <p>Then see covid 19 restrictions – says yes – at least one survey was in time of C19 restrictions.</p> <p>So my evidence is that because these sites in higher level of accessibility and have lower levels of car parking, + one survey in covid, this is likely to underestimate the no. of trips associated with the base case number of trips associated with the site</p>
Would you have used this sample of sites	No
Now para 5.3.8 -	<p>Reviewed info provided by LBW – this is the proposed use of the site. It's a method that LBW officer suggested was used: he proposed that A used 'sheltered accommodateion' from TRICs to assess potential</p> <p>But I consider this is inappropriate. TRICS defines sheltered A as being for elderly (not nursing homes) these often have on-0site staff and care workers – don't feel this is appropriate.</p>
Is sheltered accom in same planning category as temp house	Don't believe it is (but not a planner)
So proposed use as temp housing deos not specifically relate to housing for elderly... LBW trics not comparable...	I've not presented figures for this, because I concluded the use was not comparable.
5.3.1.. – id why traffic may be higher	
Do you have figures?	
Onto 5.3.14 – is sheltered housing the anal offered for dismissed – what is going on?	LBW provided a sample of sites they considered were suitable for assessment purposes based on sheltered accom (also at appendix A – p.56
Cll out locations of those:	<p>Sample of 4 sites for assessment inc</p> <p>1 in Calderdale yorks</p> <p>1 in Cumberland</p> <p>2 in Scotland – angus and east Lothian</p> <p>Next page (p57 of pdf) under location highlights 2 are edge of town locations, and moving on – no pTAL rating not present because outside London</p>
Your commentary on that re category	Consider Sheltered A is not appropriate or comparable to proposed use
Opinion on location of sites	Commonly ack that greater London benefits from greater levels of accessibility – typical to only use sites in greater London etc... (as before)

	Comments from HW officer at Wands – suggested look at edge of large towns and cities – don't consider these sites are either large cities or comparable to greater London.
5.3.17	Concl that trip assessment presented by LBW in SOC – and evidence is not appropriate or comparable for trip assessment of proposed use. Likely to overestimate no. of trips because dealing with sites in far less accessible location – much less likely to walk /p trans more likely to overestimate vehicle trips
Now 5.3.18 – what is this	Subsequently LBW officer suggested used category affordable/LA flats.
How does that go?	LBW officer provided a sample of sites – to incl sample of LA flats. Sites are at last page of appendix B – p 75 of PDF –
Run though	Generally greater london greater levels of accessibility. Sample of sites inc Bristol, Cardiff, cheltenahm, Sheffield. No sites in London. Data provided by LBW doesn't inc. trics output report – *unlike appendix A) Also looked at car parking provision data for the 4 site within sample – bristol site had 399 onsite spaces for 450 units Cardif had 50 for 24 unit Chelt had 60 for 40 Shef had 4 for 10. So av. Of 1.22 spaces per unit – with max of 2.08 spaces for Cardiff. In comparison has parking ration of 0.4 spaces per unit. Therefore, based on location and high level of parking, don't think sample of sites is comparable
5.3.20 LA housing dev	I've not looked at each site individual, but in database have been defined as LA flats
All outside London	Yes
None as TA/Hostel	Correct.
At 5.3. 26 –	Reviewed info – re trips associated LA flats. Don't consider this appropriate for trip assessment purposes.
Go to statement made – same no student units to same no temp/hostel units – do you think they would have any diff transport demands	Obviously, but the site stays in same location . same bus servs, facilities, cycle infrastructure for one use or the other. So likely use is comparable for similar no. of units.

Parties think we won't conclude. I agree

Could conclude virtually, but would Mr G would prefer in person. Ms H does not disagree re witnesses – but also suggesting closing in writing.

Could return to London next week for SV, instead of virtual closing session. I don't want to stay overnight next week.

But I could equally be here by, say 11.00 to do an inquiry session. Mr G suggesting that would be preferable – and we could use spare time this week for SV

So it may be that all but ST gives evidence this week; do site visit Friday pm. Then convene a sitting session next week – possibly Tuesday – subject to rooms; and my travel.

Then closing some other time/in writing.

Ms H in court week after, then moving house.

Adjourn 5.40

Day 3.

Tuesday In person – 10.30 start securd.

Re Descr – Council does object to a change at this stage – would be sign. Prejudiced

1. Temp accom use was expressly requested by A a week after its LDC application.
2. Also the use that the A has told the barrister it is applying for – B2 p36. (opinion provided before app made).
3. I raised issue at CMC and Day 1 and got a very clear response.
4. All witnesses prepared on the basis of that description and that is the basis that I have posed my questions on.
5. So particularly concerned about yesterday – after yesterday, Mr C evidence – A said happy to change. Was also told after that Costs app would be pursued
6. A comment was made about the Hostel – so clear concession by Mr C was COU student to temp accom by homeless – and got a clear concession. If description changes, then A will say that is not the description you put to Mr C and I couldn't search around for what he might otherwise have said. That is just one eg of where questions might be.
7. What on earth do we change the description to. So the app docs and the appeal SoC, were tenancies of up to 1 year, occ by individuals. Now through evidence, that has changed. Miss Cooley, said could be nightly, weekly, monthly, poss 1 yr + - so very dif characteristics being described throughout the evidence. So will still have problem of nailing jelly to a wall – what is this. If this were a planning app, could impose conditions. Can't do that here. So, we are not going to get to a satisfactory description – if it were 'hostel with temp accom for homeless – do we need to add further caveats'.

[original change one week in, is a result of C describing it differently]

Covering letter – says seeks change to temp housing. A asked to change within a week. Then C did change it, then slight tweak, just to form of wording just before decision was made.

Mr Gillick

As predicted in opening – legal wranglings – we've been clear from start. App form clearly says Hostel, KC opinion say hostel throughout – happens to be temp accommodation. Mr S will give evidence later. Council continuously choose their own descry of dev and. So what we have applied for is accurate; C have introduced docs with 'hostel' C are very aware of what we are proposing. C are trying to avoid costs and in an underhand way trying to avoid us getting consent. Everything is accurate, original consent is for a hostel and that would allow us to continue.

Typical wranglings to try to avoid loosing. OR clear as to what we are proposing.

[Temp accom is where we settled on Day 1 – and I see nods from the appellant. Council agree – so proceeding Temporary Accommodation]

Mr G

C were asked to concede on transport grounds. They refused this morning. 3 times.

Ms H – this is wrong – were asked for the first time this morning, and this is a misleading comment.

Mr Lewis EIC ct'd.

5.4 – Mr Lewis' proof. Talk through parking demand	Have reviewed trics database and found no comparable sites. So as a way of assessing trans impacts, looked at car ownership and parking demand as this will directly influence vehicle trips.
5.4.4 Was this agreed approach	Correspondence that this is an agreed approach
[any evidence]	Not my correspondence, believe it is in previous core docs – see C4 – para 4.1. [put to C]
5.4.5	Read out...
How calc 5.5.2	Read 5.5.52 – This provides a robust assessment – of past and proposed uses. There aren't exact comparable land uses in census data – this is most comparable, believe this is robust – includes private flats too, which would be higher – so this is robust
Table 5.1	This is data from the census – 77% would not own a car Have applied census levels, based on theoretical proposed scheme that increases no. of rooms. That increase is only as an increase as a result of incr. in rooms – of no.,

	rooms/occupancy stayed the same, no of cars would not increase
5.5.10 -	<p>Reads.</p> <p>This is robust because car ownership data based upon some tenures that would have higher ownership than proposed and also increases in numbers of occupants</p>
	<p>Based on Wands. As a whole – so does not account for fact this might be more deprived. Smaller sample would have been too small</p> <p>This is a worst case scenario.</p>
Concl – 5.5.12	Reads
Talk about parking survey 5.3	<p>Was undertaken by Mode. Under Lambeth methodology – it is a London Wide industry standard methodology.</p> <p>2 overnight periods – which is peak for resi parking demand. Considers streets within 200m walk of site – considered reasonable distance.</p> <p>Showed capacity for c. 182 cars to park.</p> <p>Table shows opportunities.</p> <p>Parking stress level is considered 'not stressed' level of parking</p>
Any discussiuon	<p>Was discussion with LBW about excluding some parts –</p> <p>Have removed the private streets cf. traffic data in mode trans. Assessment.</p> <p>C said elec bays not included – disagrees, because nothing in Lambeth method says they should be excluded. There are 3 on Danebury Av – any resid with an elec bay, inc those of this dev, can park there – just like any other local resident</p> <p>Accessible – disagree discounting – there are 3 on Minstead G, and 4 on Swanwick cl.</p> <p>2 are specific to certain resi – there is signage linking them to a particular permit – 2 bays have been excluded. But others are available to any with a blue badge. So appropriate to include in the scope.</p>
[how old is the Lambeth method]	A number of years, but still live
[would method have thought about elec vehicles]	Method talks about things that bays should be excl. but people can park here.

	Even if excluded, plenty of capacity of 3 bays removed.
Is Lambeth method reg. updated	Live doc – current ind. Standard. It's what all trans planners refer to .
How many non-allocated disabled parking bays are there	5.
5,7 – summarise please, have you been to site	<p>Yes, I've been to site.</p> <p>Gives summary of trip gen.</p> <p>In summary, because not available, have looked at parking demand instead. On worst case scenario.</p> <p>Can be accommodated on-street without any detriment.</p>
If solely temp acom v student – any material dif in no. cars parked	Increase in parking demand is a result of the increase in rooms. Again, consider levels of car ownership are robust and likely overest. With both previous and proposed
6.1.2 -	Reads 6.1.3
6.4 and 6.6	Reads 6.4.1 - as yesterday, Dr Surgery, leisure, libraries. Can access even without PT. Location appeal site provides site users opportunities for travel.
Why were you brought in – ref'd Mode and their interaction...	Mode had prepared a TS – Jan 2025. Understaindg some disagreement between Mode and LBW officers. So I was brought in to provide a 3 rd eye independent analysis.
Have you been independent	Yes
Have you disagreed with mode?	I agree
On to Wands. Trans statement 2.2 – agree it is an educ. Facility	No, I think it is student accommodation
You've assessed as student accom, not educ	Yes
Has it made allowance for CAB	No
Dist site to bus stop – what is standard to cal cistance?	Dif approaches – some slightly differences, in those measured.
	It can vary from assessment to assessment
[Why?]	Because not defined where measured from – it is for the practitioner to determine – sites are an irregular shape, difficult to find a mid-point.
[where did you measure from]	Edge of site near Picasso House.
At 2.3 – measurements are taken from mid-point?	<p>Yes, that explains slight differences</p> <p>I don't believe the measurement differences are material and don't affect overall conclusions re accessibility of the site</p>
2.6 general comment on pavements?	I think it is generally residential area; streets lightly trafficked. Comfortable footway on

	both sides. Dropped curbs on both sides at crossing points
Give thoughts on 2.6 re pavement [my pencil underlined section] – any evidence you've seen that we have intention to house disabled/blind/vulnerable	No I haven't seen any evidence of that. Understand no lifts within buildings – upper floors not accessible to wheelchair users
2.10 – agree no issues no traffic congestion	Agree
3.3 – agree with first half of the paragraph – seen any evidence that mode were asked to examine this?	Aware a meeting happened then, there are on minutes of that, so can't comment on what was discussed. Understand HW officer asked Mode to look at TRICs for sheltered ho.
Agreed deemed inappropriate	Agree this is sequence of events, and agree it is not an appropriate comparison for this landuse.
3.5 – suggests YMCA – views	On the one hand Mr M concludes use class is not comparable, but the data is included in the table after para 6.1 Sites in TRICS for YMCA inappropriate for a number of reasons: 1 is over 20 years old, both have been archived. Both include elements of care facilities, gyms and fitness classes open to the public. So for numerous reasons, these are not comparable and not appropriate for this purpose.
3.6 – LA rented flats -	Still don't think it is an appropriate category They are dif. To temp. accom. Looking at the sites in Mr M anal – don't agree that the sample of sites are comparable even.
3.7 – about office use [ask Mr M if this would incr. or decr. Extg traffic]	It's Correct
4.2 re vehicular movements – opinion on 1 st sentence	View is sample of trics sites are likely to underestimate the no. vehicle trips associated with the use of the site. Sites have higher PTAL ratings; all in CPZs, none have on-site car parking. One survey during Covid19. So baseline anal at 4.2 likely underestimates the no. of trips. Also disagree with comments re. connection to UoR – Mr M talks about proximity, so most trips to and from uni site solely, evidence has been submitted by UoR in D2 - - bullet 2d.
What do you think of 4.3 -	Disagree.

	<p>UoR students are also in employment, so trips wouldn't have been exclusively to and from uni.</p> <p>So Mr M trics most likely to underestimate private veh. Trips.</p>
UoR letter – para 7 – last sentence	Reads...
What effect on Mr M proof	Mr M seems to think trips are exclusively to and from UoR – this letter gives further evidence that people may travel further afar.
4.6 – any comment?	<p>We are not applying for student accom, so don't need to provide these.</p> <p>Furthermore, that is not the correct cycle parking standard if it were apply for student</p>
[what is standard]	<p>Mr M says 1:1. Correct is 0.75.</p> <p>Are no standards in London Plan or Wands LP. For the proposed use.</p>
5.5 – seems to divide house numbers by 1.8 – can you explain this?	<p>I find this difficult to explain.</p> <p>This is a methodology Mr M has used to try to explain trip generation of existing /proposed use. Divided no. rooms by London Plan housing targets, but has divided by an arbitrary no. of rooms linked to those targets.</p> <p>So, where my anal says 257 rooms, Mr M divides by 1.8, because LP says would count at ration of 1.8:1 on housing targets</p> <p>But ho. Targets have nothing to do with parking demand or highways impacts</p> <p>I've never seen this before</p> <p>Therefore, in assessing trip gen, Mr M ha based on 143 rooms which is not existing or proposed.</p>
LA flats	Yes
Then it talks about sites elsewhere	When assessing trip gen – try to accept this. – see yesterday's note.s
Table at 6.1 – talk through	<p>Siumm,ary of Mr M analysis –</p> <p>Far right – inst. Hostels – trics is archived – see above</p> <p>Sheltered accom – in trics this is for elderly people – not comparable.</p>
Is it a different planning class	I think so
Subsequent 3 columns	<p>Stud accom/LA fats – and next change</p> <p>Disagree Mr M anal, because of sites and way he has used LP housing targets to assess impact LA flats. He's don the same with student accom – has used LP targets to reduce. So rather than assessing 208</p>

	stu. A, he only assess 83 dwellings. – see 4.5.
On this table – student accom – assumes a lot of people are walking to UoR	Yes
Based on calc that changes 208 rooms to 83.2	Yes – Mr Marshall has derived trip rates from TRICS, but I consider they are likely to underestimate. But he's applied to 82 student rooms rather than
[won't that underestimate]	Hes underestimating trips for existing, overestimating proposed For existing – taking highly accessible sites with no parking. Proposed – sites elsewhere with high parking.
[Ms H says Mr M has not applied a ratio to trips – only to car ownership] {but less rooms}	It's difficult to follow the analysis, because we don't have the raw trics output
[what is the table showing us]	it is showing trips
[I don't think we can finalise this with Mr Lewis as he doesn't understand – leave it for Mr M]	
OK – general view?	I'm of view that anal of existing use will underestimate; proposed will overestimate and therefore overestimate net impact.
Is the LA calc based on para 5.5	That is my understanding So the number of units have been reduced The trip rates come from sites elsewhere
Do you agree with 6.3 – re ped trips	Don't agree with that
Agree 6.5 – LA flats would increase on-street parking	No
Would you agree with 7.2 -	No
Do you agree with 7.3/4	Think UoR letter makes clear that students would have had needs elsewhere – see above.
7.4	Don't think needs are materially different – everyone needs to go to the supermarket Also know students need to access empt opps. And lots of local facilities for medical/dental care.
Are students just as likely to own a car as temp	I've derived data from census and have used same data for existing and proposed uses. Mr M has used separate data – and differences between those are quite minor. I said 77%, Mr M said 70. He has applied same 70% figure to both students and proposed.
Mr Marshall's Appendix J – Is this table accurate – 208 rooms	Not possible to assess that table – does not have detail of trics sites. He says he's used PTAL 2 or lower, so this must be different to evidence.

	So this is different to that presented elsewhere.
On next table – any comments?	Understanding that anal is based on sheltered accommodation use. Which we know is not appropriate.
Appendix Q – what is reason for 'student' and 'residential' column – what is reason for change	<p>This is because Mr M has applied ownership to differing no. of rooms. He has ID 70% own no cars, etc...</p> <p>Rather than applying that to actual number of rooms, he has applied it to 83 student rooms and 143 proposed rooms. So he's assuming same level, but applying it to different number of dwellings.</p>
Explain para 3.1 – comment on NPPG?	<p>At para 3.3. Mr M highlights that the Mode trans statement does not inc any forecast trip gen anal. Mr M ref. to appendix K – that guidance was withdrawn in 2014, and is no longer relevant guidance for prep. Trans assessment.</p> <p>Most ref. is PPGs on trans assessment – it says that the scale of a trans assessment or TS varies from site to site and can use quant/qual. Doesn't say trip gen using TRICs has to be provided.</p> <p>Only element that may be applicable is thresholds – TfL website still provides thresholds – re hostel use, that doc says tha below 250 rooms, no assessment required, 250-400 TS maybe required and TA only required 400+</p> <p>Therefore TS by mode and my analysis is appropriate.</p> <p>In context – Mr M at appendix L ref healthy streets guidance from TfL - *(not LBW) and says TA only for 400+</p>
OR – (B1) p14– how many parking bays at MC	24
[are they all marked out]	Some are more informal
Do you agree with final sentence p 14	Car ownership is generally lower with this type of tenure. Both me and Mr M think over 70% likely to not own cars.
Top p.pdf.18 Do you think econ deprived people are likely to drive/heavy car users	<p>Modes of transport, eg walking/cycling tend to be more common with people on lower income.</p> <p>While site has low PTAL, there are ops for interchange bus/train – that provide users</p>

	with access to empt ops into central London. Don't think accessibility contributes to economic inactivity.
Doc C1 – 2.47/8 – do you agree, ample onstreet parking	Figs based on mode TS. Actual figures I amended to account for some private streets/ disabled bays, so slight dif. These figs and my table 5.3 but overall conclusion I agree spare capacity.
Do you agree trans not a valid RfR	My evidence that no material difference between the transport characteristics of the two sites and no material impact on the HW network close to the site and clearly no severe impact.

Adjourn 11.10-11.45

Mr Lewis XX

Your evidence opened with a threat of a costs app – is that based on an allegation that the Council agreed that through a planning app that trip rates....	It is nothing to do with me
You are not alleging unreasonable behaviour	It's not for me...I'm not commenting
You are not alleging unreasonable behaviour	I'm not
You agree/we are not concerned with planning merits – acceptability of proposal – eg not applying policy tests	It's not a severe impact, guess that's for the inspector
[intervene]	I'm not using LP policy or Framework tests
What we are looking at is a material change in the character of the uses? Understand?	Would say character is not a transport term, so I have looked at transport effects/affessibility and effecst on HW network. So if looking at character of accessibility/trans effects – I've looked at whether change in those characters
Trans and movement is one aspect of how character might be assessed – fair?	Yes – just need to define what benchmarks for assessing character on are
Agree is for A to demo not materially different?	I ----- agree.
Said in chief it was agreed with C that trip gen would be dealt with by car ownership – highlighted C4 That was a TA for the MCU application (the planning app)	Para 1.1.1 – says prepared to support appeal against LDC
Apologies – you are right: You highlighted meetings that were in relation to planning app.	I'm not aware context of meetings. Aware there were meetings C and Mode
Mr M appendix J – comments during meeting – and Mr M advice –	His opinion that should use sheltered accom.

3 rd page – 3 rd para up – cannot assess trans impact. Re agreement how things should be done – this demo no agreement at the meeting	I can't comment. I wasn't there. All I can comment is evidence in front of me. There is a pra on one report says agree/one says don't agree – I wrote neither
When looking at traffic and movement characteristics of use. Relevant to consider no trips	That's the end First thing is to consider location of site - biggest influence
Dealing with end point – diff in character between uses, things we might consider are No trips, modal split, pattern of trips, destination, timings, peak hour etc.	Its one way of assessing – lots of different ways of assessing trans character. Mentioned quantitative and qual transport characteristics
One way of assessing is TRICs	One way
Its an ind standard?	Ind standard way of assessing trip
Based on nat database – broken down to land use, sub land use, geog area, pop, ptal etc.	Yes – national – also internat – because inc Rol – filter by land use. Lots of info about the sites – age is a key factor because change trans pattern. Parking characteristics etc. are key characteristic For the pro undertaking to select sites – presence in sites doesn't make it suitable. Its about comparability
No diff filtering processes	
So trics broken to use/sub use Diff uses may have dif traffic/movement profiles	Yes
Eg office use, materially dif traffic impact profile to resi	Jumping but yes, patterns and trip characteristics are different
Said in EIC – was an office use on site	I think there are some CAB operating out of there. Stepping out of my evidence, understand its not a lawful use, and its not part of this scope. Its about a material change student acom to TA.
Well.. its about whether change to TA from use of site would be material. Is a dispute about MC h and its use as offices You've not assessed any change from an office to SA	No
If there were sizable office space on site, a change to TA would have different traffic profile	If the office was a stand alone office use. If there was a trad B1 office building on that site, it would have a diff trip profile to the use classes we are talking about. Neither me nor mr M have assessed one
Yes Mr M says he doesn't know enough about it .	
Re resi . trics breaks down – and 2 archived hostels re YMCA -	I think that's correct
Mr M thinks those sites likely to be v different	Agree no. characteristics make different Age, this is a filtering process that me and Mode went through, where we looked at sites like these, determined not relevant and, therefore, did not include.

Looking at categories – one cat. Is student housing, you don't criticise that category	Yes for existing, its an appropriate category
Now say you dispute LA aff housing – disputing category – where find that in evidence; I think you were disputing the sites.	I've not specifically stated the category, but my evidence is that the data they've provided on category and sites
So today, evidence is wrong category – is there another category that should be used	No I've not found suitable one. That's why I've not done it and looked at another methodology.
So dif uses, within resi uses, might have different profiles	Trics categorises sites base on broadly differing land uses. Don't directly reflect planning land use categories. Obs focus on more common types of land uses. For resi, B1, supermarkets – loads of sites For less common, eg. TA, TRICS will not have surveyed sites, so can't be relied upon for every conceivable land use
So, eg C3 survey's will be picking up how people live their lives – will see in peak hours	Yes
Or lots of school run, will pick that up	Yes, those are the key characteristics That's why important to get sites that are comparable. In London, more likely to school run by walking etc. suburbs. By car
Sub category important too – so for this dev, there is no way you use a student category	No, its about finding the most comparable land use But wouldn't discount location – I think location is a key priority. When I was a student, lived in warwick had on-street parking, some owned cars, but if in central London – no way students have cars. Location is a key factor.
Completely understanding, but saying for proposed use, wouldn't be good to use a student sub cat. A could have found a facility similar and gone and surveyed traffic?	Its difficult. C could have done that too – C operate TA, and could have surveyed What I've looked to do is look at trans characteristics in a slightly diff way to TRICS... in accordance with... [cut off by VH]
I'm struggling to see – are there any similar sites to what is being proposed	I don't have a specific example. But its not something completely out of the ordinary.
The two uses – student use 208 beds, single oc – is that correct?	That's what I based assessment on Understanding that use doesn't restrict to single oc.
Think all student beds were single blocks	When I went, no beds. Looked like could get a double bed in some rooms, but not my area My evidence on single o

Reason why students in HoR – is because they are a student	Yes
Typically those in student A likely to be undergrad, 1 st yr	Not nec
But main purpose is pursuit of study (accept some employed too) – but main point	There as tudent, but as UoR highlighted, lectures usually 3 days per week; 4 days when doing the same as the rest of us
No evidence that during term, anything shuts on campus	Not nec shut, but if no lectures, the less likely to go when don't have lectures programmed. – and UoR say spec to take up employment
Library?	Yes someone could visit
Student union	Could visit, yes
Café	There is a café – subway, gregs...(and others) closer than campus
But students going to campus, can't seriously say would only be there 3 days a week	I've not made that claim. Were some comments in Mr M, that trips would be almost entirely to and from the campus – and unlike mr M not exclusively for UoR, and campus for most of needs Comments by students travelling further is partly in response to these points, and highlighting that they are just as likely to travel further
Do you disagree that the library, shops, amenities, bars – do you disagree they are on the uni. Campus.	
Reasonable J to say that the centre of gravity will between Uni halls and its campus	Yes key destination – there are others
[can you descr. Typical trip patterns of a student]	Generally – less 'peaky' than a resi use – less constrained. Tend to be spread through the day, and not a high trip generating use category and characteristics will vary from site to site depending on availability of trans facilities
Would describe campus and facilities there a key destination	Yes students will obs travel there
Another clear characteristic – term v holiday?	Could vary – if an undergrad – post grads tend to be there more outside standard academic year
UoR said (D1 – p2, para 4) – its correct that one marked characteristic is diff term/holiday	Yes, potentially
Go to D2, where say this accom used by other universities	In bullet point 7. Reads.
So doesn't say MC site at all?	Not specifically, but the letter is in relation to MC site, would assume they would put in info that's relevant
Well no... 'parts of acom stock'. If it was MC used by others, they would have said it	Well, if irrelevant would say they wouldn't include it
So if that phrase relates to other HoR, would be irrelevant	Not sure what trying to say. I'm trying to say UoR have written a letter, and while not MC

	<p>specifically say sometime make rooms available.</p> <p>Just to be clear – I've not relied on that assumption in my evidence, makes clear it couldn't</p>
[we know it doesn't say MC...]	
Re bus services, appendix B Mr M	Mr M said bus goes to ASDA
One key facilities mentioned in your EIC was the ASDA	
Not available for non students	Incorrect – available for MoP, but only during term, free of charge
[uni bus service?]	<p>It's a free uni shuttle operates between uni and ASDA store, but only during term -free to use by all</p> <p>Not inc in my list of bus services, but doesn't stop at that stop.</p>
[where stop relation to site]	Don't know
Who knows if it would have stopped here in the past – plainly doesn't now.	
	Nearest stop would be Roehampton land/Danebury – prob 800m walk from site.
	Doesn't come to Minstead Gardens, as far as I'm aware never has done.
Empt – agree some will have employment, don't know where but will have to fit around studies.	Less likely
Students in student accom won't be doing school run?	
No evidence of any students here	But also no evidence to contrary. No demo makeup of students living here are provided
Temp accom – you are based on 257 bedrooms I think its actually 261, after Mr C, but don't worry. Assume single occupancy But comparing no's that is c25% more over and above previous.	Yes
Reason you say that isn't material is because past use may have accommodated some double occupancy	<p>That's not only reason.</p> <p>When talked about trans characteristics – I'm looking at site as a whole.</p> <p>No change in parking/loading</p> <p>No change to vehicles/ped access</p> <p>So conc are based on trans characteristics as a whole.</p>
You say 3.4.3 – note incr. but note some double oc. so reason you say not material, is because may have had 2 studens per room	<p>I go on to give more reasons</p> <p>But yes it could have done.</p> <p>And here, we have an option for increasing the number of rooms</p> <p>There is a scenario where no. rooms stay same</p>

Mr C accepted that if converted GF PH, could have 30 more rooms	Not here to speculate
But that's the problem, cert doesn't specify, so need to look at possible options	My evidence is existing no, and potential no and that is also what Mr M will have assessed.
But Mr C accepted there could be an additional 30 units in PH. I can't comment. If Mr C correct, we would have 291.	Theoretically, if you could reconfig for proposed use, could also reconfig for the existing use. Presume you could do at least 30 accom use
Depends on what the lawful use is	
If a 50% uplift in trips, that would be material?	Yes that would be a material increase
Mr C accepted that there could be some double occupancy.	I wasn't concentrating.
No services proposed on site – may be some shared facilities in basement PH.	Yes could be some
TA might house children.	Potentially
They may go locally, may go elsewhere	Tend to go to their local school – tend to get allocated to your local school. Believe nearest is Alton Primary, 320....[quotes others from his evidence]
If you are relocated on 1 feb, (eg) child would continue to go to existing school	Wouldn't want to speculate
Exactly	
Miss Cooly said TA residents would be people in FT work	Wasn't here.
Can we assume mix full time/pt/ and she relied on volunteering	Wouldn't want to comment
People being in FT – would have different expected emplt patters to students	Could work part time and shifts. Lots of hypotheticals and theoreticals. Don't think data is there to comment on it
That's the problem.	
Students – we know 50% come from overseas? (D2).	Yes
You said, students v unlikely to own a car. Presumably overseas student v unlikely to own a car	Census data does not id whether overseas
Dealing with liklihood – overseas unlikely to by car	Potentially
Someone in TA – accom would be only home, or wouldn't be able to return to home, if they had a car, would need to bring it with them.	Assume so
Miss C clear that some would have cars, but didn't give a percentage.	
Otherthing we know – is that TA doesn't run on term times – people will check in/out throughout the year	Yes

No period where everyone likely to leave, then everyone likely to come back	Not as far as aware
We know, LDC for TA. That could be a privately paying resident	I've made no assumptions
If privately paying; then any comments about less likely to have a car would fall away	<p>The Council's evidence is that car ownership levels between the uses would be consistent between the two uses.</p> <p>Whether they are overseas uses, difficulty is that while 50% are overseas, we don't know if they are at MC.</p> <p>Could be that at MC, there are less overseas. We don't know</p>
Gone through dif characteristics – one is term tie/ v holiday – school run/not Key destination/campus Once you step back and look at those characteristics – wouldn't be surprising if pattern of trips is different	These are characteristics you have inferred – I think more key characteristics are accessibility, location, parking provision. This is what TRICS uses to filter site
But prob with that – take accessibility and location – if only focus on those, everything always equal. Would mean office/resi the same	Site's accessibility doesn't change. But in Mr M analysis, he has taken sites from all over the country – that is what has a huge impact on the trip gen
But not asking about trips	No -characteristics, and location is key characteristic
But I'm asking about key ch of use. Focus on site, all things will be equal – must look at the use	Yes
So eg term v holidays – think accepted that not true of proposed use – key characteristic – seasonal vs consistent?	I don't have data as to whether students there throughout year. Undergrad/PG,
If I accept students tend to go home during hols. Different	Don't have data
[but back to garnet]	
✓ You've not looked at characteristics of use – just of the site. If I think students more likely to go home for hols, but that's not true TA – that would be materially different character in terms of trip rates/gen. because eg. August/lull and consistent with proposed	<p>I've looked at other things – eg parking</p> <p>Re tras impacts – always differences - that's why assess typical working week days</p>
[could there be seasonal difs]	Clearly if periods where building is vacant, there will be differences in trips. Vacancy will reduce trips in both uses.
Re TRICS anal – only is Mr M.	<p>Only trics data is Mr M.</p> <p>I looked and couldn't find anything comparable.</p>

Look at Mr M table. Haven't said correct/broadly correct.	1. Don't agree figures provide an accurate representation of likely trip gen.[cut off]
You haven't argued this doesn't show a material difference	Difficult -
If the difference was broadly students – 2 AM peak, L A flats 4 – that's a material difference	No, its not – 1 veh every 3 mins – that's not a material impact. Mr M says wouldn't meet policy tests <u>Don't think 1 veh. Every 3 mins is noticeable.</u>
But 10 fold increase is different	Again, from v low baseline, and one I don't agree with.
But nowhere have you said not materially different	Because I dispute that they are accurate figures.
Said in EIC – that Mr M had amended student trip rates.	I'm still struggling to work through Mr M evidence of how he has calculated the figures in 6.1.
He hasn't applied ratio to trip rates, but to ownership. You criticised Mr M not providing raw data	Its about not being able to follow through anal. Would usu. Provide the output files, then provide a table that summarises the trip rates. Then apply to no. dwellings.
Have you asked mr M for trics data	No
No reason you couldn't have run this yourself?	I know sites he hs used and I disagree that the sites are not comparable.
But if you wanted to check you could have done, or could have asked for data.	Yes
Any trics anal will be imperfect. Getting directly comparable sites will be difficult.	Don't know exact sample of site, bnut typically a number of sites in TRICS for that type of use. Appreciate that no comparable sites.
On students not identified any sites?	No. I've not. Within my evidence.
You don't com here and say, could use these sites	No
Your criticisms of student sites are PTAL value higher than appeal, and covid	And also that car parking lower. So all sites within sample have no parking. MC has 24. Also all sites are within CPZ. So ability to park elsewhere restricted. MC has no parking controls. All reduce veh. Trips.
[did you consider searching out other sites]	We looked, but because we didn't have a proposed use to compare it with, we didn't proceed in comparing it.
Do you did that work, and you say trips underestimated, but chose not to put own assessment	Correct. Saying level of trips in Mr M likely underestimated. Agree not provide anal
If your anal showed more trips, you've had every opportunity to do this	If I had alt, I could have presented it, yes.

Mr M says only 1 site affiliated with a uni, and only one this close.	I've not reviewed whether they were affiliated or not.
If they are not campus uni's or are further away – that would militate the other way and this would be an over rep of veh trip?	No. because no parking.
Take this point into isolation -	<p>Can't take it in isolation, because it is about a site as a whole.</p> <p>And clearly 2 vehicle trips from site for 240 students cannot be an overestimate.</p> <p>Key thing is going to be availability of parking and sample of sites by Mr M have no parking. Clearly different</p>
There are a number of factors. One factor – main/key destination. Do you accept that is one factor?	Will influence mode share
Another is parking – any evidence students were allowed to park at MC	There is parking on the site, associate with blg. No evidence they weren't allowed. And there is no on-street restrictions – they could park there
Thre are v few spaces Site vis	Clearly there was an area of parking
Covid – Mr M will say people were allowed to stay overnight.	<p>Dates (5.3.5 my evidence) – advises that trip patterns at these times might have differed. Although scale of dif will be different.</p> <p>Trics – highlights one was done during COVID.</p>
Your 4 th page – gives survey dates – by June 2021, people were allowed to stay overnight	Yes, clearly not height of pandemic, but TRICS highlights that data should be treated with caution. Can't say exactly how far affected.
LA flats – you say today you criticise sub category	Because we are not an LA flat
What Mr M has done is applied a ratio to the units – he has assessed only 143 flats. SO not assessed full no. bed spaces.	Yes
He's discounted because they are not LA flats	<p>Ack that is what he has done, but not an approach I am familiar with.</p> <p>Ratio is from LP housing targets- never seen this methodology before to assess Trans effects</p>
Its because we don't have anything comparable, so he's had to make the best of the data	<p>Thre are diff ways – Mr M has taken one approach, I don't concur, I wouldn't have done this.</p> <p>His ratio is from LP housing targets – don't think this has any relevance to trip gen.</p>

Know where comes from	Know this is about whether meeting housing targets, but don't know about this for trans
He has divided temp housing for trip gen - that will only reduce the figures	Yes, but he's then applied that to trip rates that are inappropriate. I don't agree with both elements of this analysis.
Say common practice only use sites in greater London – no guidance to that effect?	Don't have specific quote. TRICs good practice guide says sites in spec. locn. As a prof, my experience is that greater London has sign. Diff trans characteristics – esp locations used by Mr M. Location is a, if not the key factor in trans impacts.
You could have been able to id sites if you'd been able to find them	I undertook review of trics, couldn't find anything I thought comparable, therefore, rather than presenting sites I didn't see as comparable. I looked at alternative method
Main criticism – is that site had greater levels of car parking.	It's the location, also location within the town, but parking is key – 13 times greater.
Mr M recognises this at 5.6 -	Difficulty is that figures are an overrepresentation, but then he doesn't re-iterate ack in his concl. And takes figures in 6.1 as fact.
[I think we are done with this...] Ok.	
Mr M, Ap G – we'll go to site to look at spaces – but Mr M has ID spaces	Also Mr C evidence 4.1 show parking. Would just highlight – 5.3.24 my evidence – LA flats of Mr M have 13 x more – that assumes that 24. If Insp thinks less then ratio is even greater, and Mr M sites less. But my view can park 24
Both used census data – slight diff in %, you've treated each student bed as a 1 bed flat	I've used 'unshared dwelling, in a commercial building...'. Not in descry. But what I consider most comparable in database
So your census cat does include TA, but doesn't mention student bed	Not in descry. But what I consider most comparable in database
Is no student bed category.	Correct
Mr M takes London Plan ratio of 1 student bed to a 2.5 bed home. That ack student bed is not nec. The same as one household	This is on the principle of using LP housing targets to compare 2 dif uses. Fundamentally don't agree with this methodology.
But a student bedroom clearly diff to one ordinary unshared flat	Yes – don't dispute that
No other data that might have helped mr M?	Mr M has presented a method, I don't agree with it.
Your not saying he should have used other data?	No

So 22 veh dif proposed and extant, on Mr M	Yes – the level of car ownership, if compare table 5.1 with appendix Q; we've used slightly dif categories. Mr M used dif cat – and slightly dif census area. We both come out with relatively similar levels of car ownership per unit. Mr M slightly higher Dif in analysis is because Mr M has applied to a discount of rooms – and that is from applying ho targets from London plan
[If different to 1 bed flat can you transfer it over]	<u>Best fit</u> – census data doesn't have a specific – I've chosen best
[And translate that over]	I've applied to both uses.
So student just as likely to own a car as someone in a flat	No Data for 2 uses is the same I've not used private flats – that is a separate character. A commercial building is not a private rented flat is not an individual private 1 bed flat.
[What is a commercial building]	Eg student/shared facility
[Specified in census]	Don't know but there is a separate cat to private flat
["for Mr M – census inc a variety of uses – av – why discount? – might be that students have less cars, but does the category incl. a variety of uses, so is already an average"]	
Same cat. To Mr M – Cat at 5.5.4 – seems to include flats We will check# We know it doesn't include a flat	
Stepping back, student less likely to own a car	Agree – to private rented, but not TA use.
No one is alleging this goes over 100% parking stress – so just whether noticeable impact – for the Inspector	

IQ

6 – 'live their lives'	No I've used to assess travel patterns. If car ownership higher; will more likely drive
5 -	It varies from use to use – trips to daily needs, employment, shops/services. Vary on location. If accessible will walk/cycle. Less will be more reliant on private car.

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Lunch 13.10-14.50

RX

Doc E16 – based on UoR letter – do you disagree with 7.3/4	These don't allow for the extracts from the letter we discussed – re employment opps outside their studies, and could have been rented to uni's elsewhere – so some contradictions
Re table 6.1 – student	Disagree
LA flats	Disagree
Inst hostel	Disagree
Disagree whole table	Yes
Any evidence that children could be in existing or proposed	No evidence past or future use by children
Car ownership on census data?	Correct
Heard from Mr Mills – a 3P – on Tuesday; he said were being used for term time; - reasonable to assume traffic generated year round?	If used year round, then they would be. I've only visited in current form when not in use. If info occupied outside, would gen traffic then.
Re term/non – would it be unreasonable for a homeless person to visit friends and fam?	Yes
Occupancy throughout the year?	People could lead to evidence
Would it be reasonable for an occupier to leave at easter time? For both uses	Each could leave
Chrismast	Yes
Summe	Yes
Basis is MCU – what has A said re occupancy numbers?	Occ will stay same, but an option to increase
What are the additional rooms for – which use	I don't know. I've not seen a scheme for additional student units.
Is it reasonable to be asked to answer hypothetical questions	Difficult to comment. I was asked whether GF could accommodate, and additional trips – hard to comment on that. Would assume that if it can accommodate add; TA, could also accom additional SA units.
Re census data Did you ask Mr Sahota to obtain the census data from Mr M	No
Are you aware that Mr S requested this data and it was refused	No

14.00

Mr Sahota

Intro self and quals	Planning consultant etc. As per 1 of proof
Done many hostels?	Yes
Used phrase hostel and TA interchangeably?	Yes
App process, commence with app form	<p>Re app form – applied sui gen/hostel</p> <p>App form asks for further info – in box ref. to covering letter</p> <p>In letter provided further detail as to what the use was proposed to be.</p> <p>Explicit that was TA for homeless, spec category, paid by LPA, etc. etc</p>
Does app form say existing use/propose	Both hostel?
What is date of form?	13.06.2024
So submitted that day?	Yes – usually dated as completed online and submitted through portal?
What happened next Filled form, submitted to council, what next	<p>Next com is Wands registering app – F2 – they propose description – [inc COU from student]</p> <p>Then series of communications – re descr not being representative; and wanting to get rid of ref to student accom – not ref anywhere in app form/letter</p> <p>Resolved on a descry. From email from colleague to planning 8 July – ref to temp housing not being MCU from lawful use.</p>
That not changed what was applied for in app form?	<p>No no changes to app form – just trying to find a descry. That would work to fit what was proposed.</p> <p>Does app form still apply to this. When I think of temp accom, I think of Hosels – that's all I think of – it's the only experience I've had in delivering hosels.</p> <p>Term never removed from app form; no revised app form.</p>
What happened next	<p>Very little correspondence. Chasing for updates.</p> <p>These types of app usually take 8 weeks – Spoke few members of planning team – officer and seniors</p> <p>Arrived at a point where (phone conv, no written record) – advised no longer with planning team and being discussed with senior leadership of C – planning/housing teams – that was part of delays.</p> <p>Considerable delays.</p> <p>Final correspondence is last request to change descry once more, because 'too</p>

	prescriptive and not standard format'. Aware being RF, so just asked to proceed.
Who said what about a decision?	Mr Hunter (head strategic dev) had phone conversation – he said decision was above his head and was being discussed by senior members of the Council.
[members or officers]	Senior officers
Were you aware C had bid on this property?	Not sure when this came to light.
Rough date is when?	Preceeding decision – some time in October 2024.
F2 – been through this info –	Yes
F2 p 127 – what surprised you?	Obvs another pre-app going on. Believe the applicant was also seeking TA and that C were also looking to bid on the property. Also the officer I'd spoken to were in that chain of communication.
So Mr Hunter – head strat dev – that's who you talk to	Yes
And he is the person that said dcn above his head	Yes
In this FOI – they discuss TA.	Yes
Anywhere is it discussed a requirement for PP	Nothing discussed – no
Discusses C bidding on the property	Yes
Did the Council bid on the property	Yes there is an email that confirms that.
GO to SOC – C1	2.15 – Position that property was a hostel, benefitting from deemed consent. Permitted use and nature proposed use for TA to house the hless – show several key characteristics of Hostal Use – spec cat of people, communal facilities, consider COU is not MCU.
Run through SoC	
Go to officer refusal	What is striking – is ref to student accom blocks – obvs. A key difference between the parties
B1 – anything differ in site details from what we applied for	
Section 6 – agree with point that material dif between TA/StA	Not significant evidence that happens at MC
Agree – students tend to travel home	
Sig evidence of reliance on uni facilities	No evidence to the contrary on that point
Evidence move out after 1 year	No evidence to contrary
KC finds similar occupancy similar – agree?	Between former and proposed uses – agree similar
Section 8 – planning considerations: Why does PD raise its head?	I've commented in Proof – I have no idea why that is mentioned.
Onto historic consent Section 8 – halfway Was stated by you that granted 1959 – what gives impression? What research	Combination of 1. Understanding what consented – all doc in F2 and what I believe was consented in the first place. 2. Regard to correspondence from UoR – explained first hand how they

	<p>operated this facility – nature of oc; tenure types</p> <p>[original or UoR that I need to consider?]</p>
Last para – Wands. Digi records	Yes
Have you searched? What planning have you found?	<p>Yes – essentially the docs listed here and the drawing.</p> <p>The drawing on the table – there is a P6 and a P5 – other than the lodge – they are different</p>
Who was the applicant do you think?	I don't think it was a planning app – but it was the LCC.
Much interaction from WBC?	I think, based on evidence, that I've sourced or privided by researchers, WBC were v. much a consultee cf. decision maker
Did they ask for any conditions?	Yest – 8.6.1960 committee requested amendments – safety strip and inc footpath
[what is understanding of safety strip]	Think it was a strip of land – poss a Dear Leap. – an undev zone around Richmond Park.
How does Garnet Col fit in to these plans – is it a participant	<p>My interpretation is that they were an intended occupier.</p> <p>Not a proposer, but ultimately the persons who would be in occupation.</p>
Go to page after the plan – 2 nd para – (del rep – p9)	Marries my interpretation that were intended users
Who wrote?	Del CO report – so the case officer
Would that indicate to you that the officer thought occupier was Garn. Col	Don't know what she thought, but suggests that she thought they were the uses
Any research – what was/is Garn. Col	Main centre in UK for training lecuturers – diverse mix of ages/professionals. Some of the correspondence suggests everyone over 25, many also studied alongside their teaching jobs and that the site was oc. All year round.
Was it a college that operated during term times	No
25 or over	Believe so
Some had jobs too	That's my understand
Proposed use (OR p 11 – middle para) Proposed falls under a 'hostel use' Does that indicate to you that the Council is crystal clear about the app being used as a hostel and for TA.	Yes – that's almost verbatim what in covering letter
So at this time, C is crystal clear that app form said hostel and for temp use?	I think that it adds more to that – also says to house people on emergency list.
Is the council confused – eselwhere that council is confused that TA?	No
Confused about hostel use	No

Would appear clear as to what use being applied for	Yes
Next page – HMO – is this an HMO?	No
Do we need to spend any time on this – or completely happy not HMO?	Yes. Its not, it is irrelevant and we heard this from Miss Cooley. Hostel in the nature proposed by the applicant – is not HMO and exempt from HMO licence
P 13 – and Filder – are you comfortable that no MCU in this case	Yes, that's my prof. view.
Length of stay/sole residence – compare stA and TA	Similar
Facilities/support on site	V similar
HW and trans	Not a HW expert; I've relied on Mr Lewis that concludes no change
Opinion on resi amenity/effect on neighbours	In my experience, it is managed effectively in both scenarios – no difference. Mr Mills no awareness of noise impacts.
You've had prof opinion on noise – sought views about their experience. His findings – no material change.	Yes
A KC was engaged?	Yes
Were they aware it was TA	Yes
Aware it was hostel format	Yes
So their opinion would tie in with what was before inquiry	Yes
So KC opinion last para of OR p15 – do you agree with?	I agree with KCs opinion that there were no conditions attached to the Deemed consent.
What is your understanding of deemed consent? And what leads you to conclude it is deemed consent	Just going through docs in F2 – 1947 Act S35 talks about deemed consent and the circumstances in which it can be given. Clear to me that an app being made to a minister, not an LPA. Clear that the planning dep were merely a consultee and not determining. Further dev was by LCC – a LA defined in the 1947 Act . SO I've drawn the conclusion that LCC are an LA, are seeking the dev – they were able to proceed by this process
Do you know of any other similar proposals/processes by LCC	Done a fairly deep dive. Understand that LCC had acquired quite significant swathes of land. Ultimately built Alton Estate by this method. Clearly they were developing post war in effort to rebuild Britain.
So planning docs – minutes of WBC meeting and the plan – any others	Nothing I would describe as a planning doc.

	Various other memos. From other devs.
OR – page from 16 ...Fragments of funding... are you aware what docs the officer is referring to?	Assume it's the other forms of educ cttee reports, ministry of work memos, but unclear.
Back to F2 – pdf p 64+ Reasonable to assume these are the documents	These are the other scans that have been made available, re. other meetings/committees
Not planning documents?	Not in my view.
Next Wands SoC – C9 – 2.5 From C digi records – this is what is in file and drawing	Yes – the planning docs I was ref. to
2.6 –describing scheme that was originally proposed. Is this dwg 3020	Yes, everything in this para is shown on the drawings, perhaps not the safety strip.
2.7 Appropriation ho to ed – planning doc or not	Not sure what appropriation means – land use/funding
2.7 – ed sub committee report – planning doc	No – ed
Agree/disagree 2.8	Fundamentally disagree
[what do you mean by 'planning document']	Whether spec ref. to Town planning – so we have a TP committee report (8 July 1960) that is spec relates to planning, and a drawing that I consider to be a planning drawing – that was considered at committee Other docs talk about other things – educ, funding etc, but these are more general documents.
In description – common rooms in MC Have you seen evidence of this	Yes – I've seen historic photographs that show people sitting around in MC. My take is that it is a common room.
how apply a common sense point to prev use of MC as a whole	As a hostel
Reasonable to see conditions	On evidence before me, I can't see any reason for conditions
Do you understand what I'm your man is about	I understand
Have you seen any limitation that would be applied to this site by condition	No
4.7 – totality of the permission – inc DH and MC in one overall consent – have you seen a plan with the 2 sites on it	No
Seen a permission with the 2 sites on it	No
Seen any indication of 2 sites put in same basket	No – going through the historic evidence, my conc is that it is the opposite. The docs are referring consistently to 'sites' in the plural rather than 'site'. Talk about as 2 distinct things. Makes distinction re training col, or hostel. Always 2 things are happening.

	Read evidence as whole – Garn Col may be one end user, but always ref to as sites in plural.
What is commonality	Just the end user
Doc C10 – in appendices – ref diff in zone between MC and DH p.28	Sub-section re T planning. Quite late in process – in area zoned for resi; prog. For redev in first period. Arch prepared to recom TP approve from planning. <u>DH is not in accordance because in resi area and used for educ.</u>
Site or sites	What I said a moment ago.
Are DH and MC collectively grouped/separate	Separate
Uses	Clear distinction. Both zoned resi – MC is that purpose, DH is contrary.
C9 4.9 – last quarter of para a)	Different opinion
Which is	This is a bare hostel by deemed consent.
4.25 – considering para you read in C10 – read	Reads...
How correlate to para 7 of C10	Direct contradiction.
4.28 – descry – one of 2 docs – shown as hostel units	Drawing and committee report – 2 planning documents They are showing and referring to hostel accommodation.
4.29 – re funding – came from MoE – your understanding	Yes – no final funding note, but in archive info – there are reference to this. That's my view.
If we go back to, are you clear that situation C10, para 7 is the way it is – does the site change from being residential use to education use because may have been funded by DoE	No, I don't think funding changes the land use. Para 7 in C10 is quite clear about what the uses were.
4.34 – Town Legal opinion as part of LDC application	Don't think that was with initial app. Just the KC Town Legal note came with appeal itself.
Q 4.34 – when was Town Legal opinion submitted	With the appeal. That's why it's being ref. to here.
So KC opinion – does it find deemed consent more probable than not	Yes
Does it find more probable than no conditions	Yes
Does Town legal agree?	I believe so.
4.46 – second para. How has the Council gone from – fully understanding what was permitted, to situation that C do not consider it is a hostel	I think the officer goes on to consider that in their opinion it is an HMO. She gives her reasons that I do not agree with.
You are clear it's not an HMO	Yes
Clear it is a hostel	Yes
Fact that hostel used for TA, change that it is a hostel	Yes
So can a hostel be used for TA	Yes

Miss Cooley – did anything stand out/or are you comfortable	Everything she was saying is what I understand to be the case re hostels and TA.
4.60 – compare to Roehampton letter. Terms/sole resi/communal facilities/common educational endeavour as part of institution. Same establishment. Dedicated shuttle buses. Resi pay for accom. Does the UoR agree with these points?	Some appear to be consistent with letter. Some don't. Provision on basis of terms – I think tenancies are almost a year. And Mr Mills said sometimes people stay in summer Sole residence – disagree – UoR ref. to international students – say sole residence in UK. Communal facilities – agrees. Common endeavour – not necessarily – prob with some characteristics is looking at student accom in general terms, not just MC – but correspondence says other inst. Using it, and could be used by others. – so don't nec. Agree. Access to facilities – clearly facilities are available to students, but not exclusively limited to those uses. Dedicated bus – agree there was a bus provided. Final bullet (p21) agree. Paying – assume they do, but don't know if they get grants/bursaries. No info Last point – assume so.
So heard from trans consultant – amenity impacts – what is your opinion.	Amenity is talking about neighbouring amenity re noise/disturbance. Buildings are where they are. Layout is not changing. OC levels are not changing. Proposals are looking at similar numbers. Ref. earlier acoustic opinion – concurred that no impacts. Related is trans impact, commings and goings. Clearly, parties disagree. But I accept Mr Lewis' evidence – on basis that no additional movements, no impacts either.
From other hostel schemes – how much car parking	0
Do homeless people in TA have cars	Experience is that they would not generally have cars [what is your experience?]

Trans network under pressure here?	No
Retail – dif in the facilities used by Stud/reis of TA.	No, don't think so – would think they would use in much the same way
Do you know about Dr capacity	Yes – I noted in C case – re what available – HIA is referenced;
How old is that?	Think it is 2018 – fair few years old. When looked through evidence based – think it's 2011 census data- and also only ref. to 4 doctors practices There are now at least 10 in the catchment – saw on NHS website. All accepting new patients. – will see at SV.
Is UoR a branch of Putney Mead	Yes
Adjourn 15.25-15.40	
NTA PoE summary E4	No
1.2 – do you think it was well founded	
Did they apply the balance of probabilities to this	I think if they looked at the info, and applied that – diff concl
On bal of prob – does it have planning	Yes it has deemed consent
	They say don't know what it is, but whatever it was, its not a hostel
Any evidence educ use	No
Any evidence lawful office use	No
Any – not lawful office useconfused...
What is the lawful use of the site	Hostel
Any evidence that hostel use abandoned	No
What think about assertion that it was abandoned around 2001	No evidence of that
In hostel experience – seen students in hostels	Yes – students can live in hostels
Can they live in non-student hostels	Yes
Bare hostel?	Yes
2.1 – no ref to any condition limiting nature of hostel use	Yes
Bal of prob – hostel w/o restriction	
Can hostel w/o restr. Be used to house homeless people	Yes
Is there anything in LDC app that changes app level	Not materially
[clarify]	Suggested layout in terms of how could be used, and a lot of data anal is based on potential to take to 257 rooms. Dif between our understanding of most recent use to that is not materially different. Equally could be used in exactly the same way.

	Understanding of submission, that is the best case scenario. – try to get a bit more out of the building
In planning opinion – does proposed scheme by Mr C require planning	No The works he has illustrated are internal. Do not change the use materially – no further consent needed.
3.4 – deemed consent – how probable that DH and MC were linked and subject of joint planning app	I don't think it was a planning app. Only linked by end user
How probable	That linked as a planning consent – highly unlikely.
3.5 – planning conditions	Based on evidence, balance of prob, no conditions
Drawing 3020 – probable/improbable planning drawing	Probably – has all markings of a planning drawing.
What are the main features of that drawing	Annotated principally with hostel accommodation – a couple of other buildings. But clearly intended hostel accom.
What is house	Principals residence
Does that impose occupancy restriction	No – and no ref. to a self contained DH. It's part and parcel of what is described as hostel accom. Consider it is just another staff building. [can we go in?]
3.8 any ref to student docs, written by educ cttee ... etc. – just explain what docs ref. to? And types of cttees. And purpose of those.	A no. diff types of docs in research – some valuer, ed off reports, public memos, SV notes. Think these refs. Are used interchangeably – HoR, Hostel etc. Having gone through info as a whole. The more common use of language is hostel and certainly planning docs ref. to as hostel accom.
In general – do those docs pre-date your findings of deemed consent – or post date	Principally they are before – some a couple of years ahead, when proposals not quite settled. Settled mid-late 1959 on a proposal. Thereafter, on planning doc re. as hostel. C statement – goes to other applications later on. Evidence base, index at F2 – pre-dates. But around 1960, when believed deemed consent finalised, we are talking about hostel accom.
When do educ cttee date from	A few – earliest 1957 – SOCG10

	Written from a certain perspective – committees focussed on education – would expect use of their language to be things they were familiar with. Eg. HoR. Planning wise – and where we see ref to planning (eg c10) different language is used – about land uses.
Anything in docs that indicates Garn C were party to the deemed consent	Nothing other than being an end user.
Anything you've seen that contrarurally makes Garn Col to MC at time of deemed consent	Nothing contractual
Could LCC have replaced MC as an occupier	I've seen nothing that says it was for exclusive use, no planning conditions/personal consent.
Have you seen letter from LCC to Garn Col indicating when MC and DH ready for their occupation.	Yes Think doc 27. (F2 108) Its about when the buildings will be ready.
Would you deduce from LCC educ to Garnet	Yes
Does it inform them when ready	Yes, provides an update on the build and when ready
Would that indicate that Garn Co are the occupier	Yes – GC are the user, but nothing to do with the construction
So LCC the developer	Yes that's my understanding.
If it were a PP, they would be applicant	Clear through docs – they are the proposer
Because GC getting advised of this, are they a separate party?	I've seen nothing to say they are anything other than the end user.
[gov body?]	Don't know who this is – assume college. Reads as addressed to the college. Final sentence, re need for governors approval – ref. to needing them to discuss variations with the governors.
F2 – p79 Does this document group together or separate DH and MC	Separates them. This is one of my clear references to there being two sites
Were you ever of the opinion that an app or property holding together twiht DH	No
Back to summary proof – 3.10 Any evidence that UoR use inconsistent with deemed consent	No – UoR continued the hostel operation.
Fact that students/workers/other people, have any bearing on hostel use	No, not with regard to uni and how operated
Who else has looked at use of uni	Miss Cooley
Miss C is a hostel expert	Yes – and also in student accom – she came to same conclusion.
3.11 – LPA attempt to acquire – how many attempts?	Based on correspondence – 2 separate attempts
First one?	F2 – doc30 – p 2 – (pdf 117) – para b; then spec MC at 118 – and acquiring premises to attract teaching staff to the borough, and

	wishing to provide bedsit accom. – 3 rd para p 118.
Any in evidence elude that pp required.	Not int his letter
Is the use in 1989 different to the use that could have been used according to hostel deemed consent	Yes – this is a hostel accommodation
What do you think, when council wrote this letter, thought lawful use was	Hostel
Does not indicate thought student accom	No thought it was hostel accom, to be used as bedsit to serve teachers, generally. Unrestricted purpose.
Second attempt, info is considerable	There is some repetition, but there are c.200 pages of FOI. Goes to some detail about the approach being taken, use, business case. Clear that a number of senior officers involved in advising whether to bid or not.
In some emails, the planning dept are copied	Yes
Housing	Yes
Leaders of council	Yes
Potentially CEX	Potentially. Head of regen Very senior people
At same time as bid/ongoing pre-app -	Yes with same depts – don't know if same people. But certainly an awareness of it.
3.12 – do you think MCU	No
Does UoR	No
Is there any change in occupancy levels on the back of a COU	Not if just a COU without any potential works
Are the potential works subject of this LDC	No, it's a hypothetical anticipation of how it could be use.
So 3.16...	Reads...
Still hold that opinion	Absolutely.
Do you think students of UoR would have just as much negative and negative effect on econ and local community as people housed temporarily	Pos and neg similar – I think the impacts are essentially the same.
3.17 – econ backgrounds similar?	Yes I'm strengthened by views of Miss Cooley – earlier this week.
LP28 – how should it be applied	It shouldn't be. I'm of the view consent is a hostel and not a loss of student accommodation. Therefore not relevant.
2 3 rd party observations – Mr Mills – Mr mills concerns	Think Mr Mills was referring to the wrong application. Re vagueness; was perhaps looking at wrong info.

	<p>Students always quiet – I support this. In my expericen of manged hostels – also v quiet.</p> <p>They operate on 0 tollerance basis – ASB locked down quickly.</p> <p>In that way, both uses are the same. Short term occ; - UoR letter is at odds with that with up to 51 week tenancies.</p> <p>Students were mature, undergrads there for considerable periods and the accom was made available throughout the year. So short term accom not reflective of this property.</p>
Letter circulate by Mr Doody any investigateions on what he said?	I've looked at some of the consents
Some of his opinions you share? Owned LCC	Agree
Available docs suggested internal development	Dev being carried out by themselves.
Supports idea of deemed consent	Yes
Explains absence of pp	Yes
Ref whiltelands cottage – didn't benefit deemed consent and has multipe conditions/permissions have you looked at them?	I went through quite a lot of the docs. Seen several DNs, and there was no conditions – ¾ conditions to sign. Consent, but nothing about occupancy
1959 v similar to MC	Yes – within a year
Where find info?	Info is on WBC portal – Distinguishing feature, this was not promoted by LCC – it was an applicant, submitted planning app. Pp was granted s/t conditios, then there was discharge of details.
What level of documentation would have been under that ref.	There were lots of docs/drawings
Paper trail substantial	Yes
Records – does it inc 1935?	I didn't look at this.
Broadly agree with that table – that says consent, conditions - in short time	<p>Yes, I agree with he paragraph.</p> <p>Would add, use of conditions – more recently , lots of conditions -even small schemes.</p> <p>Historically, much less common to attach a lot of conditions.</p>
Back in 1960s, what would conditions take the form of	Depends on the scheme – but usually materials/landscaping – but not to the levels experienced these days.
In the planning process, have you been aware/seen/heard of comms with council's housing team	Yes

Can you elaborate	Touch in proof – C housing team were interested in taking occ for TA. Ongoing discussions for Mr Worth – interim head of housing, perhaps – senior figure in housing – understanding terms being discussed, re rental levels/occupancy levels. A real interest is documented
Any pref to how rooms laid out	Yes – attended some discussion. Direction to inc. W/C and ensuite and kitchenettes as per modern expectation
Does that change it to C3	No
Self contained	No
Any other hostel devs recently	Yes
Facilities	Yes – most recently in LB Hackney – both have ensuites and kitettes – also communal area to ensure still a hostel. For largest – 295 rooms – v. substantial and similar in size.
How did those discussions progress?	They were positive to a point and then we were asked to no longer engage
Why are they not here	Believe because they would not be appropriate given that appeal is against the LPA
Were they asked by appellant to attend	Yes
Refused?	Yes for these reasons
Did LPA seek attendance	Yes
Who would have been best place to comment on car ownership in TA	They would have been – would have been good to explain how their facilities operate.
Re transport – how did interaction go	Mr Lewis covered it – was discussion prior to appeal trying to agree approach. Don't need to go over again. There was a comment earlier about whether Mr L asked me for census data – he said no. But I have an email from him that says yes. I recall the email, because trying to narrow issues. That info was requested and a further meeting requested with officers, but told by legal team (I believe) that it would be inappropriate to have further discussion and should be channelled through legal representative
Did you think there was an agreed position	From mode yes
Opinion on trans officers concerns	What goes to heart of this inq is MCU . one of those impacts is transport. I find the conclusions of the council's trans officer confusing and Mr L has similar concerns about the approach. Approach is something he's never seen – he's experienced.

	<p>Worked together many years – I trust his judgement.</p> <p>I've looked myself an dusing housing del targets to justify trips/parking requirements/uptake . can't get to the bottom of it. My reading and Mr L proof is that conclusion on trans impacts are unreasonable.</p>
Comfortable LDC text and title is clear and accurate	<p>Yes – no ambiguity about what is being sought.</p> <p>App for is clear – hostel Letter adds colour to that re spec cat of people being housed</p> <p>Say could be this/that – but very clear in the letter that people on C emergency list.</p> <p>People that would otherwise be experiencing hlness – v specifi.</p>
Lpa seems to have problem with how broad? Deemed consent?	<p>Deemed consent was broad. We don't think any conditions – and ref. to hostel.</p> <p>Was an intended occupier, but see no restriction.</p>
See this appeal as trying to keep what we already have.	Yes, continuation of extant use
Back to conversation with Mr Hunter (head of strategic development) – political or planning decision?	<p>My take –</p> <p>My understanding is that the decision was no longer with the planning team. It had been taken higher in the C. were discussion heads planning, regen, housing. Ultimately, we see where that landed.</p> <p>So whether that's heads of dep or Councillors, I do not know. But was conveyed out of my hands and with those higher than me – I'm told which way to go.</p>
Conclude LPA instructed to refuse?	One of those parties won.
Lastly – attempted SoCG – didn't get there. What happened. What went wrong.	<p>Essentially couldn't agree some basic facts.</p> <p>Think were about 35 iterations.</p> <p>Can see who changing what – 4/5 officers + legal , with large elements being removed.</p> <p>If they were not factual and disagreed; could have gone to an uncommon ground section – but that being pushed back, but gave up.</p> <p>Eg. Did council bid on property – wouldn't put in, even on uncommon ground.</p>
Did you try putting statements like Alton estate developed LCC	Yes tried to put in uncommon
[will this help... maybe just make a submission with ref to the final unagreed version]	
MS Hutton has raised a point that Mr Curtin shows change will be MCU.	First question is – do you have a planning qual.

<p>What is a MCU/what is COU.</p>	<p>No was the answer Legal No. He then probed on intricacies of MCU. To ask architect on MCU is unfair. As a planning professional, my proof is saying I don't believe MCU – its nuanced, fact and degree. Don't think Mr C knew differences COU /MCU and intricacies. So would take his comments on materiality as...</p> <p>But re difference here. Can have COUs – eg changes of use classes.</p> <p>In terms of this, talking about one hostel going to another hostel use. In my view is not a MCU .</p> <p>Must go to further detail – what are material impacts, does it change the character. Is that, that I don't think Mr C fully appreciates and that is the reason for his answer.</p> <p>When look at OR, talking about trans, amenity, services – 3 key factors officer was assessing. There are further conversations about nature of use. But material impacts on OR, its those that need further exam about whether materially changing or not.</p> <p>But conclusion we reach is that no MCU.</p>
<p>Just mentioned that bare hostel/broad hostel – any leg to stop app putting 500 people there</p>	<p>There are other regimes – fire, Bcontrol, govern how intensively can</p>
<p>If double or tripled could it be MCU</p>	<p>Maybe, fact and degree – look at on merits 200 – 500 probably MCU. If consider comings/goings – arguably. But if retaining same level of occupancy, then no.</p> <p>That's the nuance that was not appreciated</p>
<p>Any planning leg to stop putting 30 units in MC?</p>	<p>Not realistic – needs LBC – prob refused (have been involved in many). Can't start chopping them up and putting people in them.</p> <p>Wouldn't just start using for 30-40 people</p>
<p>Is lawful use consent ticket a licence to do whatever you want</p>	<p>This case specifically – no</p>
<p>[LDC certifying use as Temp Accom – what would that allow]</p>	<p>Use of the site as TA. As a land use, inc MCH as temp accom. But that doesn't follow that can then start</p>

	<p>intensifying/accommodating more people in. You have ancillary functions too and the appropriate use that put those too.</p> <p>Straying into could be this/that – not what's proposed</p> <p>We are saying we are looking to use in same manner as has existed. The scenario is not that incr. occupancy levels significantly – that goes to the heart of this.</p> <p>500, 600, 700 people = enf action because MCU has occurred.</p>
Could you put bathrooms in MC?	Not without LBC- as Mr C said
Could you split rooms up	Not in G1 LB. – highest 1% of graded buildings.

17.00.

Update rooms -123 booked for Tuesday. I have a room and A have room 12.30 – 5.30.

Thursday held in reserve.

Will be a 10.30.

Adjourn. 17.05.

Day 4 – 9.30

XX

When first become involved site	Beginning 2024
Temp Was COU 2024 – involved	Yes.
Help prepare?	Yes Colleague submitted, I was involved
When first visit	Before that – c. Jan 2024
See Mr Curtin PoE – P13 Been inside MC H	Yes – perhaps on first visit – taken around by either UoR staff or Savills
Who owned then	The charity that leased property to UoR
AkA looking to buy	Yes
How many times in MC H since	3
PH – when first go in	Same visit
How many times	2/3
PH – how many times visited top floor	2/3

GF? – ask about the bits – top left is CAB – been in	Yes – poss only once
Below that – Mr C wasn't sure – said locked – been in -	No think it was locked – 2 rooms bottom left
Next to that – empty	I can't recall going in
To right of that – locked – been in	Think I have – think it said dining on the one to the right of it, believe storage
Top right – been in?	Yes – also has glass panel – storage – series of chairs. Think the last 2 doors – slim room v top locked.
Basement – 2/3 building to left been in?	No
Been to any basement	Think only B1 Maybe saw some plant in B4
Not been into metal workshop	No
Ever visited principals house	Yes
Don't have any floor plans – been inside	Yes
Give a description	In a dilapidated state. Layout unclear – prob 3 principal rooms
What do you mean	3 main rooms
Kitchen bathroom	Couldn't tell
[what sort of rooms]	3 principal rooms as habitable spaces – ie not bathroom.
We know renovations have started	Not reno, but idea that test unit is being laid out
But evidence that UoR lease doesn't expire until 2026	Yes
Who undertaking	Appellant
Have uoR relinquished lease	Don't know
But you are A	Well, NTA are
You haven't asked Mr Gillick	No
You don't know whether UoR agreed to withdraw objection as part of agreement	No
Any discussion UoR since 2024	No
Might have shown around	In Jan 2024 maybe
No contact otherwise	Not other than security guard perhaps
Anyone else at NTA planning had contact	Not that I am aware of
Attempted any contact about UoR	No
So you haven't asked UoR anything about their use	No
Correct you are the applicant	NTA
Are you a director	Yes
And NTA is the appellant	Yes
Fair to say not independent	Yes, but asked to put NTA as applicant, but acting for AKA
	Asked to put NTA as appellant
	Taking instructions from AKA
Think you were speculating on discussions about high dictat in Council	Yes
ST will give evidence on oath next week and she was not given instructions on how to decide	OK
Is that end of matter	I've given my opinion.

Jan 2024 was date of MCU accom. At that time, appellant's position was that COU student to Temp Ho would be material	Was initial consideration yes
Accept burden is on the applicant	Yes
Consider what that means 2 routes to succeed Route 1 – a historic consent for a bare hostel use – and no MCU away from that. (and proposed use aligns) Route 2 – lawful use derived from UoR use and your proposal not materially different.	Yes, and aligns with inspector scenarios
What you need to demo: Route 1 – 1. There was pp for a bare hostel granted around 1960 2. No MCU in 65 years since then 3. Your proposed use not mat diff permitted use Route 2 – 1. What the lawful use by UoR is. 2. Your use not materially different to that.	Yes
Need all of those things?	Yes
TA is applied for. I needs to be satisfied that the totality of uses within that unmbrealla term would be lawful	Within reason – can't say TA in isolation. Insp has suite of docs that outlines what the proposal is Covering letter says what the use is specifically <u>Hope Insp report ack that not every which way is before him.</u>
But if site sold in future – They can put it to any use within TA	Don't agree
[why not]	Wouldn't just look at DN to say what use is – will be a report with the decision outlining basis on why MCU not occurred. Will say why no MCU between what consent and what not. HMOs, C3s, not proposed. No proposal to double – all material factors that change the use, but quite clear that it is change to specific category of people – outlined very clearly.
[but in the future – 4 corners of certificate]	Still of the view that can't look at it in isolation – need to understand why the decision was made.
So – from first ans – you accept that if ended up HMO or C3 there would ba material change	Yes
Use class not end of story – but its character	Use class is a clear indicator

But you would accept that character is different – StA to HMO/C3 Hostel to HMO/C3 – MCU	They would need to be materially different, but yes
Client has had legal advisors throughout process	Yes
Not going to XX on law, but position you've taken is wrong in law. Accept to pursue an appeal on the basis of the answers you've given in unreasonable.	No. Because what is applied for is very clear. May get to how we ended on this descry of dev, but intention of proposal clear
But if cannot legally succeed – unreasonable appeal?	No.
Re parameters of evidence – not claiming COU mixed us, inc HoR and offices to TA would not be material	Don't think there is a lawful office use on site
If there were	If there was a lawful office use there would be MCU
Legal point – won't XX – office use doesn't have to have been there for 10 years to be the existing use. Can't revert back.	If something implemented without consent in LB, and then they stopped it, you could revert back. Ok we'll make submissions.
Only way can succeed on route 2 is if show it is only student accommodation	Yes – student hostel use.
If any other uses on that site – or I not satisfied not other uses on that site – route 2 fails	If he finds separate distinct uses and not ancillary then yes
And route 1 fails because MCU away from historic position. (if mixed use)	Yes
CD file – A – covering letter, legal opinion, some extracts. Maybe some floor plans	Don't recall if there were.
Take out A1. Silent on use of MCH?	I think the letter refers to site in general as Hostel accom
Go to P2 – 4 th para – PH – and separately let office space – so contention various things, inc 'separately let' office space No contention that office and flats are ancillary	Believe the flats ref. to FF of Picasso Let space is ref. to CAB space – sub let
So CAB clearly not ancillary to SA	Possibly not directly – I'm sure students would have had access to it Don't know details of the use
From flats – used by visiting lecturers, not ancillary to student accom	Visiting lecturers and staff – for UoR
But not ancillary to St A	No, but still being used as hostel accom
Metal workshop not ancillary	Where it is, expect is a maintenance area for the site
Know UoR used for no uses	We don't know that.
Metal workshop reasonably incidental?	Yes – 200+ rooms, plus dining spaces, lots of doors/handles. Everything requires maintenance.

	Not unreasonable to think some kind of workshop for a maintenance workshop on the site. For the estate
The whole UoR	No this estate – its quite big
You've not asked UoR	No
Not been in	No
First yeard – Mr C evidence – were you aware metal workshop	I think so, but not been in.
At whatpoint aware	Just in general discussions about what there – plant, storage, maintenance space
Before LDC?	Don't think so
Before proof	Yes.
You were aware metal workshop before wrote PoE – and claelly away separately let office space	The CAB – yes
Do you mention them in your proof?	No just refer to facilities. Don't refer to CAB.
Been into MCH – seen same office layout as Mr C	It was empty – no furniture
But saw same layout	Yes, but no indication of office use when I was there
Before Mr C evidence, ST evidence were you aware it had been in office use (before wrote proof)	Yes I understood there were administrative functions there
Who told you	On one of my walkarounds
So from a walkaround, you've assumed admin functions	It was a guided tour
By whom	Jan savills Subsequent, someone from UoR
So did meet someone from UoR	Security guard
What exactly did they tell you	Can't remember
In your proof, you say admin purposes assoc with site. 4.1	Yes
Say told that on a tour	My understanding
Not investigated	May have been some signage. That's my understanding, but can't recall how that was set upon exactly.
Back to cover letter – A1 P3 – in the present case... That is what you are telling C the use of the entire site is (the property)	Yes
Don't mention any other uses, office use, metal workshop, CAB etc.	No not referred to additional ancillary uses.
These 5 bullet points – given your contact with UoR was poss tour in jan – who told you about the use by the UoR	Would have been in discussions. Subsequent with the applicant team. I had discussions with savills – they had knowledge – had discussion on walkaround. What I could see then, and several months of discussion after that.
Then after that – proposed to run As close as poss to the former use 4 bullets – (inc 1 year tenancies)	Yes
That's the full extent of the proposed use you tell the Council about	No

	See page 2 – TA to house people on list
But re character of use – level of detail is on P3	Just trying to highlight similarities.
Now know from Miss– Cooley stays could be night, week, month, year or more	It can be. In my experience, that is not the case with type of accom proposed Licences issued for 12 months
But depends when get their property	Yes, but given sign. Underprovision of homes that's unlikely
Miss C said 6-9 months	OK, I think 6-12
Your PoE says could include families.	I'm referring to couples
Come on... what is a family in ordinary use Means children	Not nec.
So you say families, and that actually means couples	I think it could be individuals and couples
But Miss C says could be children	Yes, but given safeguarding issues, probably not here
Go to Doc C2 – slide show with appeal. p.2 – reads.. go to p 21 – you are explaining schools that wouldn't be relevant unless site was proposed to accom children	Just a slide show saying facilities in area
But why would you highlight this – it would be irrelevant	Because of criticism of access to facilities
P23 – again children's/family hub	Don't have to be a child to use community facility.
(Muses about what we know about possible use from AC) F2, p33 – Counsel's opinion not q's of law Who is specialist real estate ltd.	Believe it was co. name, changed to AKA
Were you part of team drawing up instructions for Ms Kabir Sheik	no
Don't have instructions?	No
Look at what she was told – para 6, para 7 don't know if she was provided with plans or just told this. Para 9 reliance on visitation report. Prob falls into your class of non planning docs?	Yes
Then para 10 – reads... Conc that approval most likely sought was training college and hostel accom	Yes
So basis is 16.05..1960, 8.7.1960 and plans – that is the basis	And the visitation report I think she ref. at para 4 to early documentation .
Para 11 – I'm instructed... mirrors descry in covering letter	Yes
Don't think she is told anything about use MCH?	She ref to several docs, and I can't review them all

Can come back.	
Her para 11 – age of Garn Col over 25 years old. Where is evidence	In the general research. If you research Garn col online it goes into detail of that.
[I think I saw a history of UoGren or something?]	I recall having seen something but I don't know where it is
There is a footnote to a book in a letter, but not before the inquiry	I recall seeing photos somewhere and think I saw it somewhere int here
We know there was another occupier – [churches trust] But Ms Sheik was told it was in continuous Can't say either way whether there was an intervening use that was not for ... What is about 10 year period that Battersea Churches Ho trust had property	Not sure of exact period
Nobody in room knows what that use was?	I can't recall how I remember, but I was advised not necessarily students. Or that didn't operate in student housing.
So we don't know what the character of that use would have been	Can't say one way or another
If we can't say one way or another – you can't demonstrate on balance of prob that what you say is the permitted use has continued to this day?	I think, on balance prob someone acquired. Remarks in fairly poor condition. My view is that that it is unlikely someone would have acquired and left it vacant
Yes – we don't know what it was used for? You've got to demo it was continuously in use... we have a c. 10 year period with no evidence of use. So can't show the use continued	There is nothing in evidence that shows it didn't
But the burden is on you?	It was used hostel initially. Have break, then continued as Hostel – think on balance, change/function would not have changed. Joining dots would have continued
Different answer – was don't know either way, now would have continued	Don't know – likely it was- yes. Because what preceded same as what came after.
[Have you tried to find info on this use]	Yes – had researchers looking.
P15 of Ms K-Sheik opinion Client was describing use as temp housing – then she's asked to advise if material Then para 16 – Q asked is change StA to Temp Ho. Use being described as temp housing Para 17 – don't know what she was previously asked Permission granted for training col and 15 resi blocks – see that	Yes

She says training col and 15 resi blocks – mixed use?	Think its too site
She says permission for this site?	Don't agree with this sentence. I don't think it is a single site.
The opinion you are relying on – you don't agree with.	Its been updated.
Nothing in your proof that suggests you disagree with these opinions	Ms Sheik updated her advice in December in prep for this appeal.
Are you relying on the first opinion at all -	Its a starting point, it evolved as more info came available.
Para 19. Reads... Para 20... reads... If the permission was a training col and 15 resi blocks – rather odd conclusion that the hostels were not granted in conjunction with training col	That's why we can't draw a conclusion from a single sentence, and I disagree with para 17
Para 30 – outlines what she is told... (same 5 bullet points) about previous use of site. Is that fair	Yes
31 – she is told... That's the extent of what she is told about proposed use – fair?	I think she does acknowledge that it is for TA, so obviously having that in mind
But TA not a term of art – can't look up definition?	No, but as a practitioner, is what I understand as being housing for those experiencing homelessness.
She's not told could be a range of different periods	But they will be given a license 12 months, even if move out earlier
Not told about couples/families	No comment in here
Not told about internal configuration	No, because at this point we are focussing on use. – no colour about upgrades – just use
Not told about what is available on campus for students at UoR	She would have been aware of the location. She can see where it is. Can't conclude she's not aware of the factors because not in the bullet point
Para 33 -she's told occupation would be similar	Yes
But now we know that Mr C says there could be more	Don't agree What Mr C didn't appreciate is that 1 st floor has a 'footpath in the sky' – gives light/access But GF is a solid mass – don't get the light penetration – so only get perimeter – inner part is not habitable space So can't necessarily put the same accom on the GF
But there could be some additional – will you give a number	No – because it's been historically communal, we'll keep using it that way. A has been open and honest about where see potential gains, and where could include additional rooms, up to 261 including the lodge.

Potential for couples	Yes
Even if half the reisdnets were couples, you'd have a sign. Diff occupancy level to StA	No.
So at moment 208 – no evidence of couples Go to 261, say 100 are couples – jump to 360	But rooms wouldn't comply to be for couples If you were to occupy for TA – you are governed by Ho Act and overcrowding legislation – there is guidance on minimum size of rooms for occupancy levels
Where	Setting and standard document – ref'd to. If you were to occupy, would need to adhere to housing act and the relevant guidance on overcrowding. So there were minimum standards he was designing to. To have 2 people in a room, should not be less than 13.9 sqm. These rooms as currently laid out, are not that big Can't just stick people in and ramp up numbers
Could if they were privately paying	But that is not proposed.,
Ms K-Sheik – bullet points 1 and 3 of advice – we now know to be wrong – not the full picture?	You could have couples – yes 3 – you'd have one year licenses
But 1 year tenancy implies someone staying for a year	Up to a year
Fair to say not given full picture about variability of occupancy	I think as a matter of fact you are given a year. People may move in/out earlier than that s/t other circumstances.
Not the full picture	Not in that one bullet point.
Para 33 ...reads... 34 – reads...	She doesn't give a view – qualified advice.
C5 – Archo 2 nd para – based on years of experience... and far greater risk... In all likelihood will reduce sign... and decreases... So in this letter, archo are assuming an MCU would arise if an increase	It would appear that way
But there could be MCU as a result of a decrease	Agree
This letter is not saying the uses are similar? Saying this is more beneficial -	Think it is a general comment about students, not MC specifically – dealt with in evidence

	<u>Also heard from MR Mills on Tuesday that there was no disturbance from this particular site.</u>
<u>Yes, that was Mr M evidence – but you said similar, and that's not what this letter says</u>	Letter says in general, likely to decrease
Opinion – para 36 – says policy not determinative. Doesn't say policy not material?	Not sure what she means
Doesn't say irrelevant	No
You say irrelevant	Yes in my opinion –
you don't share Ms KS opinion –	Neither of us think that it is important
She doesn't say UoR might be materially dif to that of Garn Col. She says understands continuous use for students – not a question she is asked.	She makes comment on Garn Col – what that was. She makes comment on what UoR was. I would think that infers she's considered what they were and hasn't been a change; and then she goes on and says no change
Para 13 – 'it us understood...' this is what she's been told. And not told about MC H	Will look.
Adjourn – 11.00-11.20 [Mr S follow ups?]	Yes – opinion at para 7 – ref to 8 July 1960 document – SOCG24 – F2 p100 – 2 nd para ref. to MC converted to provide a student common room. Point is that Ms SHeick was unaware what that used for – that is not the case because of that document gives a use.
Ms Sheik not told about use of MC by UoR? Para 11 – is where she is instructed as to the use of the property	She doesn't ref to MC in this bit. I can't see anything.
Go to second opinion F2 p 42 We don't know what documents she was provided with.	Believe Town Legal provided the chronology
Not your instructions?	No, but I@ve had convo. I think TL were involved
She then gives 'facts' ascertained para 10.	Don't know whether told, or her opinion.
Which historic doc – esp planning docs – states that MC is not part of the training college	Multiple ref in the docs that refer to this a 'sites'.
Which doc says MC is not covered by the training college use	Several – looking at archival research: SOCG15 – F2p78 – plan A plan B (not planning, but adds colour) – DH spec training, Plan B the accom

	SOC26 F2p113 – educ report (adds colour) – p105 – 2 nd /3 rd para – gives v. clear descr MC; and DH for college purposes
See p. 104 – do we need to look at docs as a whole	Yes
So council 20.10.1959 – approved appropriation Ho to educ of DH, with view to change to training col – v clear educ covering both purposes	Yes, but doesn't speak directly to land use from TP point of view. Could ref to funding. I have evidence to the contrary
Next doc	F2p107 – Mount Clare/DH – v clear distinction
But note para 3 – ref to study beds	Yes
Next doc	29- visitation report – P114- talk about separation
Read as a whole – 'social centre for college'	Yes
[What is this?]	Those residing in the hostel blocks
But represents as part of the college?	Not in my view
Start of report – visited college – clear indication teaching, admin, resi all part of the college	Used by the college – doesn't say all one use – distinct spaces described.
All part of the college	It's a matter of fact was used by the college
You want to distinguish – no indication something separate, they 'visited college' and inc. resi	Need to look at the paras in full. Later para, clearly gives separate sites
Nothing to prevent a college being split across 2 sites?	No, but need to look at the purpose of those sites. MC – as far as this text is concerned is used by the college. Have a separate site used for teaching
What would the principal be the principal of?	Its further hostel accom
Repeat question	Could have been the principal of the college
In all likelihood?	Yes
So staff accommodation	Yes
Staff of the college?	Yes
Next doc	C10 Another joint report – section regarding town planning – p28 - sites zoned for resi purposes. Goes on to say DH not in accordance with – because used educ. Infers both sites for resi. Ack MC used for its designated purpose, and DH not. The minister should be informed.
Think of an oxford college (eg) – resi college.	Didn't go to one - If it was all on one site, I'd agree.
It's a resi college – with lots of things. Mixed use?	

But nothing to stop one scheme covering 2 sites – you could make a planning app with 2 red lines	I think I would make 2 apps.
No legal reason why you can't do that.	I'd need to look at the procedural order.
P27 – clear costs ref as one scheme	Broken down
Yes – but one scheme	Yes, but clearly 2 sites
P28 – all one scheme – training col/HoR – inc principals house	yes
Would have been part of the training col?	No, Goes to point that this is a resi site, with resi purposes.
Have educ function on a separate site. Agree to disagree.	
Any more	These are the principal ones
No reason why a planning unit can't be across 2 sites.	They are physically separate, ½ mile apart with 2 distinct uses its not one PU
	Also – final wands BC report – F2 p.99/100 This provides some distinction.
[you've previously stressed planning docs re the use – but for 2 sites/planning units (a planning matter) you are ref to other sites. Are these docs of comparable weight?]	Certainly the LCC docs/cttee docs. The language is used quite variably – hostel/HoR etc. Trying to hone in on the docs that are planning related, which prob use more correct terminology. So when looking at Cttee report/mins – would ordinarily be the D making authority if it wasn't LCC on own land – that refers to hostel and dwgs that show hostel. So planning docs, more likely than not will use own terminology.
Weight to other docs	Add colour to background – but strongest weight to those focussing on Town Planning.
You say 8/7/1960 is the key document.	Yes
Normally you'd find use in the descry, plans for the ops	Yes use in the descry. But also ref. to dwgs as well.
1 single ref no.	Yes
Both sites	Yes
Erection of col	Also says resi in next column
Erection of college and ancillary buildings	But also says resi
Single ref no	Yes
2 sites	Yes
Descry – col?	And resi
Resi could be existing land use	Not my take
[have you seen the table header/ other docs in this file?]	No
	We have a scheme BC being asked for its obs Don't think one ref no. distinguishes not 2 sites. Think MH and DH being being distinguished.
Well.. now go to report ...col and anc buildings on those two site...	There is more

Col and ancillary buildings is on those 2 sites	
Not got there – college on both sites	For colleges use
All we can see is both in col use	No, I think they are both being used by the college; can't say that it is same use
Only reasonable reading that college both sites	That's not my view.
What is the college – further explanation – of college and Anc buildings. Correct?	Yes
We don't know if Ms KS provided with these?	Yes – she refers to it.
[Burdle PU usually the unit of occupation, what is that]	There were two distinct purposes go into 2 nd and 3 rd parts 2 distinct and separate sites – one resi and one educational
[my 18]	None that I would consider not ancillary There were dining and common room -
[know of any other facilities they had there?]	Can't recall
Principals house not ancillary to student accom	No, I'm saying it's a hostel – not a self contained DH
What possible evidence to say its not a dwellinghouse?	I think its all hostel accommodation.
[MC a single PU]	Yes
[Inc principals hous]	Yes
What is the unit of occupation – did you answer?	There are two separate ones. DH and MC. Burdle says where poss
But Garn occupied both sites	They did.
F2 p92/3 Is this a planning doc	It's a memo – I'd give some weight – not a planning document. Its not a main document I'm relying on – LCC docs flip flop between language
What is the distinction between a planning doc/not	Ultimately what the Decision would have been based on.
So doc 24 – doc would have been based on	That's what I give more weight to.
See doc 21 – (F2p93) Recom – 6a – 1 scheme 2 sites	Yes
Reasonably HoR can only be the 15 blocks	I think the use of language is unclear
What other buildings would HoR refer to	It ref. to the drawing – there are HoR and ancillary buildings shown
Back to second opinion F2 42., 10(iv) – Where do we see funding being provided by MoE? (you say that in your proof) I can't find any ref. In fact, where funding discussed it's by LCC.	Think ref on p 27 – C10 -
Don't think it says funding by MoE	Think TP and Ed Ctees picking up the tab is about the heritage buildings, but

	expenditure on wider proposals is with the ministry. – maybe look into it.
Para 12 – sets out S35 1947 – you say you think its deemed – you think that's why no doc	No requirement
So if no doc for a deemed pp, no descry. How on earth would anyone know what its for	<p>Need to look at the docs presented int their entirety</p> <p>Various stages of ministerial approval in doc – under S35, it ref. to an order or a Notie being issued</p> <p>We don't have that piece of paper</p>
So would have been a decision doc	<p>Don't know what form it may necessarily taken</p> <p>But incomprehensible to think that they said they'd get approval from minister but they just carried on without</p>
But there is no decision document, containing the approved plans, what the use is. How on earth would anyone know – you would have to have a decision document – saying the plans, the use, conditions	<p>If a PP – agree. IN what form this order or notice taken, I'm not sure.</p> <p>Clearly doc is moving to that point that going to make app. To minister.</p> <p>So on balance prob – must assume that got to 1960, its been to borough C and ministry wanting to get on with things. There is a desire to crack on, and site meeting with ministry at the site.</p> <p>They must have approved it.</p>
If proposing contrary to dev plan – had to make an application to the minister	
So one explanation is that they had to make a planning app.	Ok
Town Legal assumes that because there was a deemed permission, there is no document. but there would be one?	There wouldn't be a pp, don't know what form a notice would take.
Is it your view that any time a gov department provides some funding for dev, that dev will automatically get PP?	No -
So must be a decision to give the deemed permission?	The ministry has to sign it off – give it the go ahead.
There would be a decision notice? If under this section, there would be a decision document?	Yes but not necessarily the form of a DN in the form it was there.
[whatever form, there is not a letter saying 'yes']	I don't have one. There is not one in evidence.
That notice would at very least say what the dev is, including the use.	We don't know what it would have said.
You say believe entire Alton estate was deemed	Yes
Bold?	To say it wan't is a lack of understanding about how it was dev – LCC spearheaded,

	owned land, went through planning history – see no planning consents. Taking same conc.
Because there is no decision doc, it must be deemed – but must have a decision doc	There would be something, but we don't know what. And there is no planning permission.
But if a deemed consent, would be a doc. Without that doc, can't tell	Didn't think there would be dispute that Alton estate consented in this way. It was probably phased.
Para 17 of opinion. Ms KS – having regard to dev in Q – deemed approval self evidently used as hostel. She's basing that on, presumably para 10(ii) – what she's told.	Don't know if she has been told. Or came to that view.
Para 22 – the site plan – ms KS doesn't note the tabular bit we went through – she doesn't note the descry, and what was proposed 'on these two site' – that's not in the opinion	Assume she was given a copy; and, once again, you ref to descry, but left out resi. I don't think she would just be told – she had a chronology with relevant excerpts. The chronology is appended to her opinion – assume it is her chronology
Para 22 – the site plan – agreed usu use is in the descry of dev. We know also the principals house We know all those plans have Garnet Col written on them	Yes
If look at those plans – and decide what use of MC building was – you couldn't Just the drawings	Why would I look at that – I'd look alongside 8.7.1960 doc
Agree that from plan can't tell what use of site is, because not told what use MCH is in	If read cttee report. Don't cherry pick. (although plan doesn't show – no annotation.).
Opinion p 24- where any evidence for this in the docs?	
[all very interesting, but I think we know Ms KS didn't have a full picture]	
But F2.113 – also know operated in terms – para 3.	
UoR WD letter – gives views on Garnet, inc. non-standard term dates. Nothing here suggests teaching all year round? Says dates non-standard.	Yes, we can take that
So UoR not saying Garnet Col students not in residence throughout the year?	No
Re-affirms Bat. C*Htrust – not clear...etc. [no question]	
On the historic use – aware of any appeal/court decision where court/inspector	Not that springs to mind – maybe make submissions on that

has pronounced on the terms of a permission without the permission itself.	[don't surprise the Council with it in closings]
When considering MCU – need to consider entirety of PU	Yes
You now agree with ST that use with UoR, the planning unit is effectively the application site	Yes
[does UoR occupy DH?] [Council thinks they do occupy] [but may be this means that it is def. all student??]	Don't know – might see on SV -
Looking at our site – we think this has some staff accommodation in top floor	Yes
Presume UoR Staff	
Don't think have any evidence that the use of PH is exclusive for the 15 blocks	<p>There are markings of what those uses were.</p> <p>There is other more recent accom some way away.</p> <p>Don't think likely that residents elsewhere would dine here.</p>
No evidence from unit that use of PH was ancillary to the student accom. D2 – used no. purposes in addition?	Not sure it ref. to anything specific.
MCH – know Mr Mills said 2009 in office use	<p>No – he went into a room that looked like an office. His professor was there – had title – 'environmental' or 'greening'.</p> <p><u>I don't accept office – eg B1 as a distinct land use</u></p>
E8 – sign photo Clear that what we have here is admin office space for Uni as a whole	No
Not credible to say all these uses, and 'dep property and FM' is reasonably ancillary 200 bedrooms	This is a big building – not unreasonable that would have a fairly sizeable management team for the assets we see
So 208 bedrooms would have a finance team – reasonably incidental	Don't see why you would not.
Uni head of security - really incidental to the residential.	I've seen security patrols there
Project's team -	No idea what this is.
[these uses incidental to Uni or the site]	<p>I think the site –</p> <p>But also very short lived use; don't know the extent of the uses – was it intention, but actually the didn't as eg can't chop it up. No evidence of it actually being used for these buildings</p>
Mr C view that still laid out as an office	Maybe – but could have been put to multitude of uses – wasn't my impression.
Go to F2 – p 142 – PDF.	Something to do with the acquisition.
They thought there was office accom	Yes

Principles house – know derelict – but nothing to suggest anything other than self contained DH	Not my view One hand say its an educ site, other hand SC DH in the corner – doesn't make sense – just
Don't think the principal would be given own house? House with all amenity Students couldn't wander in and out?	Don't think C3 Prob couldn't just wander everywhere, but don't believe it is SC.
In proof – say LPA case says if student occs, it becomes student ho. If applied PP HOR – would be sui gen use	Yes – that would be its use.
So student HoR is a planning use	Falls outside UCO
Historically seen could be HoR, student accom. Could be hostel.	Today wouldn't call it HoR/Hostel. Would call it student accom
For A to prove lawful use on balance of prob	Yes
Would agree unreasonable for an Appellant to assert a particular use without any evidence to support it	Yes
Unreasonable to pursue an appeal without full info of the use of appeal site?	Generally – that's not the case. If it was completely without foundation, appeal submitted, no evidence of uses it may be unreasonable – that's not the case here
Agree unreasonable to pursue this appeal without even asking the UoR what its use of the site was for	No – we have documentation and we were advised by the reps selling the site – not. Unreasonable
We have UoR letter – says variety of uses	Yes – <u>means it wasn't just student accommodation.</u>
Enough evidence here to show it wasn't just student accommodation	Yes – there were other ancillary functions
You then have to demo – that all the other uses are ancillary. Correct?	Yes – ancillary or incidental.
Look in your proof – where do we find evidence of all the other uses – or justification that those other uses are ancillary. We know there are other uses on site. Where do I see justification/evidence that those uses are ancillary?	Touch at 4.59. – hostel use and communal facilities. And in Picasso house/dining areas
Is the office a communal facility	Think its ancillary
The metal workshop	Ancillary function
Its unreasonable to simply assert that an office use is ancillary	Not if you look at the site; go into the buildings.
<u>Lunch 13.05-13.45</u>	
UoR position D1 – correct that nothing said here is incorrect	Superseded by second letter
Nothing to say, sorry we mislead you etc	Says 'having reviewed our position and records'

	Take that they have reconsidered and 1 st letter is no longer their position Little weight to this
But re facts as to what goes on at UoR, nothing to say it was wrong	Says they have reviewed and no longer wish to pursue. They've changed their position on a number of points.
Go to p2 – para 4 – talk re under grad students	Yes
Says considerably shorter – then says 'tend' to travel home... 2 matters of fact about use by UoR - Undergrads 36-39 wk tenancies - Also tend to travel home	No comment
D2 – lengths of stay – 1 st letter say undergrads 2 nd letter – all students (51 week) So might be post grads that have 51 weeks	Yes
so letters not inconsistent	No
Some will continue... separate licenses	Just says it does happen
Nothing to suggest most	
Back to D1 – At uni- can use support services – to ensure students not draw extensively on local resources	Yes
D2 – para 5 – used combination of campus and community. Paras are not inconsistent – first we put on loads of facilities, not excessive draw; second use some.	Yes – clearly some uni facilities for the 12,000 students – we are talking about 200 at MC – statement of fact that there are uni facilities available. Can understand point about not wanting to draw on local facilities for Uni in entirety.
Not inconsistent?	No – correct that facilities – Adds/ack that students at MC v much use local facilities.
Yes – a combination...	No response
D1 – pdf P3 – increase in oc – D2 – silent on that issue, but at time of D2, had not produced reconfiguration proposals for the site.	No Mr C doc is dated April
Back to D2, para 1 – some students, not given any indication about how many	No
Also know some students continue, don't know how many. Para 2 – not sure how diversity goes to MCU, but OK – 50% comes from overseas – so sole UK residence. No suggestion that student accom would be the sole place of residence?	Yes – nothing in that sentence
Assumes students would have other places	Overseas yes – but assume likelihood of venturing back and forth is low
We can't know	No answer

PT work – sign. Proportion engage PT work No mention of expectation of FT work.	Ref to majority – so more than 50%
No – wouldn't expect FT work	No – not as in mon to fri – clear studying 3 days per week. PT – not sure can draw a conclusion on what a FT job is This infers working alongside studying. But not working mon to fri.
When writing letter, est. wouldn't have seen reconfig plans. Wouldn't have been aware of Ms C evidence about likely lengths of stay	No
And not her oral evidence. – variable stay.	Obviously not.
Wren't aware potential for children on site.	Silent on it. I've raised matter of safeguarding and likelihood of children.
MCU – looking at change to character; evidence in the round. Will be a number of factors	Yes
Change in character – you know it when you see it?	Fact and degree in each case – need to get a bit more involved
Not mathematical	Qualitative rather than quantitative.
Know descry is TA – and know C case on breadth of that. Put to one side. Focus solely on if lawful use is TA. So Council says there is a mixed use, You said if mixed use wouldn't say no MCU	Correct
What was the UoR use?	
[2 routes 1 Hostel, no MCU – still a hostel 2 Lawful use derives from UoR] If on route 2 – what use did it establish	Either 'student accom' or Hostel (Ms Sheik or hostel)
Are they the same or different	Could be
If you had to pick one]	Student hostel – consistent Ms Sheik
So.. starting from Student Hostel – hypothetical from here... and that the use is that described – your narrow view of what TA is – as described.	OK
Should I take them into account in establishing an MCU	Whether can affect the character?
Yes... Individuals as students/proposed indiv, couples or families	Would be relevant, re. individuals/couples If limited to that, not nec a difference Couples – based on hypothetical. Scenario by Mr C of options.

	But can't operate outside other legislation. Don't see this as a family place.
If children, would be indicative of MCU	Fact and degree. Matter for consideration.
208 rooms now. One reconfig to 261, potential for double oc; some potential for more. [I know your view on that]	Proposal before us is simply MCU. Proposal shows improvements and possibly – 'best case' maximum. That's how we've then assessed it.
A relevant factor	Nobody talking about significant increase in numbers. If could double/triple then it would be relevant – but don't see it can
On and off-site impact	Yes
Likely length of stay – relevant -	It's a factor.
If decide students tend to go home in hols; unlikely temp – relevant?	Yes – relevant factor. Also made reps on that. Re year round use. And can't suggest Hless HHds don't visit families at the same times
If students have another home/TA res don't – that's relevant?	Related to term/non- do they go elsewhere to stay – don't think But relevant factor.
Relevant to consider use of local facilities	Yes
And type of facilities – eg if children – need for schools/play space	Yes – but earlier caveat re children
Trip volumes/patterns	Yes – relevant
Likely age of occupants – 1 aspect of demo	Yes, likely to be material. View that likely all working age adults Don't think that is sign. Relevant. (but this v low weight)
Neighbouring amenity – and likely impacts	Yes – relevant.
Insp has the parties positions on these.	
LA proposal to acquire the site: Proof 4.47 – was C bid to buy, but not the local <u>planning</u> authority.	Yes – in discussion with planning officers
Was housing team	
You produced 200+ pages	From FOI
Where in these emails do I see anyone from planning not needing pp?	No suggestion they would Would think if spending £4.5M – would make sure it can be used that way
Your client bought site	Yes on that basis Both apps determined in October/sept – was submitted before other determined.
F2 167 – re wedding venue – surely there wouldn't have been suggestion that wouldn't have needed pp	I think it clear they weren't proposing to use that building for TA.

	Ack G1 building – and couldn't easily put TA in.
But you are relying that planning assuring others not need pp, but they must have know pp needed for community space/wedding venue.	This is Mr Worth 'spitballing' about what MCH could be used for. But focus of correspondence is use for TA.
Marketing report. P 142 – s/t necessary consents. Pros/cons on 157; negatives – no pp in place.	Deemed consent
It's a negative – clearly need PP	So, couldn't go in there and use as student housing??
No you are relying on these emails as assuring housing they don't need pp, but a negative of the proposals here is that there is no planning permission	Not disputing that; but in correspondence, clear indication is use as TA. Nothing saying need CoU/pp Nothing in here that says they are suggesting it is development.
Also ref pre-app that would be usual if someone thought they needed PP	Not necessary
But nowhere that any assurance given that PP not needed.	See nothing to the opposite. Think with that kind of money – you have a pretty good idea you can use it for what you want.
Mentioned scheme you'd done in Hackney. – Kingston Road?	Yes
Only for families	Yes
Took lead?	Yes
Are you aware TA on that site used the TRICS hostel category	Don't recall.

IQ

6	Temporary accommodation – in isolation, potentially – needs to be read with the rest of the documentation, with the app form.
7	Principally – administrative functions; further discussions would be with end user as to what their requirements were. Don't see it being more accom Some ancillary function; communal space – grand buildings etc.
8	Have worked on several hostel schemes – have never planned for parking; never considered an issue. Also experience in hostel development – have done dev's of varying sizes. It's not planned for.

RX

Any floor plans MC in the app	Don't recall -
Is it large/how many rooms. How much usable space	3 floors – and attic. v. much a loft space. Starts in basement. Probably 4 or 5 rooms – relatively small scale cf rooms in building. Ground floor grandest – entrance space/staircase. 2 principal large rooms; v grand Prob 3 on ground floor
How many elsewhere	3 on first floor, with grand hallway.
Re CAB – regard their area as large/small	Very small overall
Pull up E9 – See ref to CAB on that sign?	Can't make out on photograph P3 – white sign, says CAB I think
Assume it does – what do you think happened in 2019	Think that is when CAB likely took the space in PH.
Would that occupation and use as office be lawful	<u>No subject to enf.</u> [so MCU – not asked, my note]
MC use	Hostel
CAB – unlawful?	No evidence of a MCU app, so if separate then unlawful
Any evidence of non-ancillary office use	No other
We've read that UoR letter, site started to be vacant. As became vacant, did MCH become vacant at same time	Yes
What suggest ?	Became vacant
Are office/resi uses connected	Yes – if vacated at same time and no evidence of continued office use when hostel accom vacated. Would be unfair to say MC was central office space serving whole estate
Do you think UoR would run their head admin functions from a building with 6 rooms – campus facilities – a mile away	I think it would be on the main campus
Metal workshop – pull up the basement plan [relatively how big is this]	Room B5 – very small – B1 is a narrow corridor – this is a v modest room.
You've been in the corridor. What is the access to this area?	V restricted – ramp – goes down to double door. Leads to basement. No natural light
Been everywhere on site	Yes
Where do you think the maintenance people would operate from – where store tools	In this building – most appropriate place.
C2 – p34 – Tenure	Similar
And runs through the list -	Similar.

Similar to all points	Yes
Last – residents typically not children	Yes – that's my position.
You've been involved with the legal opinion with Town Legal	I've seen them
Confident they've been given the evidence	I believe they are based on the docs they saw
Any evidence that Battersea Church Housing changed the use	No
Any evidence that MCH has LBC to change use	No
Any sign that the building has changed use since 1960s	No
E7 (ST Proof) 5.46 – think was mentioned that a period of 10 years disappeared Seems to say Garn Col Can you account for 1999-2001	Only a 2 year gap here.
In the KC opinion – have you ever read that the 2 sites should be regarded as one PU	No
Agree KC opinions	I do.
Do you think improvements on the building have any regard to the use	No, needs an update before the next occupation
Works are irrelevant to the use?	No – it's not the accom they want – they would be making improvements
Is the occupancy level irrelevant to the 2 uses	I think nature of the uses are the same.
Is the oc level in legislation	Yes – see above, multitude of legislative requirements.
Was zoning the same for both sites	Yes, both sites were zoned resi. And DH contrary.
Who stamped docs on p 29 -	Finance committee, educ sub committee, architect to the Council.
Was mentioned – C10 – pdf7 – para 3 – 400 students/270 halls – does this sound like a residential college	No there are more places than places to stay
Planning docs we have: in your 20yr experience, whose responsibility is it to look after the docs -	Record, usually on Council's portals. Should be up to date
Fair in C proof that we are criticised for not producing the info	No, and we have gone to pretty extreme lengths to find other sources.
Yesterday said Garn col effectively tenant	No I see no other evidence. They were the end user
F2 – p.113 half way through 2 nd para – burden re 3 part time/and ft courses – operates all year round?	Yes – full year and shorter courses.
Para 3 – 'modern teaching block, blends with DH – adapted as admin centre. (p114) What does that give you – separate/together	Consistent with advice prev given that 2 distinct physically separate sites serving their own functions.
Term time – section 5 – Indicate what	Indicates that main activity is the 1 year FT courses, not seasonal term-time courses.
Balance of prob – did they get consent on 3020	Yes

From the 8 July minutes	Yes
Think LCC have deemed consent	Yes
C10 – p33 – point 3 – indicate each site independent	Yes – each site independent
What use for MC	Student common rooms
What use DH	Tutorial rooms, common rooms etc.
If you were a student at Garn Col, and not staying at MC – would you have a social facility	Assume use common room at DH
If IN MC, place to meet friends from another block?	Yes, go to Mount Clare. Previouspage holds further on this; intro; second paragraph. Teaching DH, hostel MC. Distinction is clear.
UoR letter. General q's – letter suggest students poor	Yes a significant portion
Similar economic power to someone in TA	Yes, comparable
Is a poor person more/less likely to travel home	Less means to do so, so less likely to travel home
Would these students have to work to survive	Letter makes that clear.
Revisit hypothetical position when – case of abandonment, UoR came in and commenced lease 2001 – where can you show me that there would be a restriction on the occupants only being students	I've not found anything.
why is it a student hostel/why not a bare hostel	Makes no difference.
Is it a hostel, or is it a student hostel	Its just a hostel.
[I'm quite aware the appellant's position is that it is a bare hostel]	
F2 – p129 – Ian Ruegg – housing ofice	Refers to dealing with the 5 blocks and making a case that no MCU. Just dealing with TA
Anything about planning – just talking about there not being MCU	IP makes case not MCU
What do you want to say	Housing confirms urgent need for the accom; Mr Worth should have discussions with the applicant, (oct 2023),
Go to p127 – within 1 day discussions about planning, then discussions about purchasing	I think they are aware of case re no MCU & C interest.
Later in trial, evidence C bid.	Yes, I think so.

Mr Mills Q –

Comments on my student occ comments	I think I've seen references
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Are you aware that UoR – is a collegiate uni – a collection of colleges making up university -	
Makeup means follow ecclesiastical calendar – Q is are you aware when summer break starts – when they start and go	Don't know the dates
Understanding of universities – when would you expect it to be close	June – august – late.
Yesterday, you were asked on my point about Uni allowing people to stay in summer When do you think Wimbledon championships helpd Did mr M say it was used by others -	Said other occ outside I thought said, eg Wimbledon; if that's not right then only eg is Wimbledon, then so be it.
Re NHS – in area – made claim up to 10 NHS practices within catchment. Can you explain what sort of facilities are within those.	Roehampton surgery – Roe lane– GP Carslake Road – Roe – GP Danebury Av – GP Mayfield surgery – GP Putney Mead Group – upper Richmond Rd – GP Alton Practice – Roehampton Lane – GP Essex House, Station Road – GP GP Pathfinder clinic – buckfold road Oak lane med centre. Point is lots. Was looking at HIA that referred to 4. Receptionist also called several taking it on
Are you aware how large the catchment is re milage	I just know they are in catchment and would take on patients from this site. Suggests you are in an accessible area.
One catchment – Putney mead – used by UoR	Yes – satellite surgery on site.
So students don't travel to Putney high street -	Potentially. If just consult, go to satellite, don't know if fully equipped.
Would future tenants access uni GP hub on campus	No -
So will sign up with local GPs/dentists	Yes, and many are closer
Do you think that bringing 240/60 brand new customers to local GPs will not create sign impact on GP services in GP area	No, because already part of the Putney Mead Group – doesn't add to No.
But students prev to Hub, weren't signed up with local practices	Don't know what they signed up
Reasonable to expect signed up with PMead GP	Maybe, but no additional uptake on services -

So rather than travel c 2 miles to Putney – might sign up to a cloer	Yes – makes sense – several, with capacity
So 3 on Alton estate- not a significant impact.	If at capacity, not taking on patients; then all confirmed capacity for at least 10. There are plenty that are available.

RX –

Have we given clear indication that no increase on NHS demand, and how funded.

Mr S –

Yes funded nationally and Miss C gave clear evidence.

Mr Marshall

EIC

Take proof as read	Ok
Confirm your qualifications	All correct
When you are asked to consider transport impacts, what info do you need	<p>First – a reasonably detailed descry of site – current/future uses, details of access and egress, inc emergency servs.</p> <p>Then expect profile of existing trans and HW conditions.</p> <p>Pub trans access, PTAL analysis, profile of rail services, TIM maps from TfL, descry of road network – about safe/suitability of access, brief descry of on/off st parking.</p> <p>Might/might not incl parking stress survey.</p> <p>Then, brief chapter on how proposed dev accords with nat/regional trans planning pols</p> <p>Then trip gen anal – for extant – ideally from current counts (if there is any), if not, TRICS reports of trip gen across all modes for extant use; forecast trip gen for all modes of trans for proposed use of site.</p> <p>Expect to see what A proposes to provide, whether overspill on surrounding HW network.</p> <p>Then brief descry – what if any mitigation is required, necessary to make acceptable (eg R123 tests)</p> <p>Conc as to why app thinks dev should be allowed.</p>

V comprehensive – here dealing one hand planning App, one hand LDC. Move on to what happened here. But your proof is not a policy assessment	No
Q's about trans gen/character Para 3.2 – was a planning app and LDCin parallel. - Had meeting	That was in response to the refusal of PP.
Did meeting deal with both apps?	Dealt with 2024/0183 – the planning application.
Around 2024 – what were you told about the extant use of the site	First was when responded in writing to ST in writing – when read D&A statement for the planning application. Didn't find floor plans v easy to follow, but understood extant use of site to be 180 beds for students, and up to 28 beds for visiting lecturers.
Info about proposed use	Gleaned what I could from the docs. Temp housing for a total period of up to 5 years for homeless people on C list
Took from DAS.	Mainly yes
3.4 of your proof – you said most similar land use was sheltered accom.	Yes
Now explain you don't think that is correct. Please explain	Think I got confused between sheltered accom with what we know to be supported housing – eg YMCA might provide – where self-contained flat/bedsit but access to wardens etc – maybe if you have mental health probs or learning disability. Only after reading TRICS and dictionary def of sheltered that realised that it is mainly directed towards elderly people. Get a S/C flat with a warden – might be some communal space for social, but mainly a self contained ½ bed flat.
Since meeting – also examined surveys (3.5) Provided profiles of the 2 sites – go on to say, effectively discounted those as sufficiently similar	Unfortunately, can't get the trics output for archived sites. So had to take individual surveys – carried out – and then derive the number of beds from that site and factor it up to make allowances for 143 LA affordable flats
So YMCA sites – concluded not sufficiently similar to this use.	Mainly generated lots of trips and seemed they provided additional facilities on site. Rooms to hire for parties and the like. No way differentiating residents and other public facilities

So where you ended up – at 3.6 – why most appropriate to use LA flats	Because, ideally, that is where these people would look to move on to, once moved out of TA – lifestyles and habits might remain broadly similar.
Go on in that paragraph – used a ratio in LP – equivalent to 1 flat to 1.8 beds	That para relates specifically to delivery of AH Can deduce that flats, Contributes to supply of AH But didn't think fair or credible that one person living in one bed would have same transport impact as one person in a LA self contained flat.
Re para 4.1.9 – delivery of AH – what we can see is all other net non S/C should count towards on basis of 1 to 1.8 ratio. So 1.8 non-s/c counts as 1 home in the LP You said wouldn't be fair to assume every unit is one flat	Particularly, without analysing household car ownership levels, that doesn't include a cat of people living in TA and TRICS gives per student bedroom, but for LA affordable flats doesn't give how many beds per flat
So TRICS data, when looking – it is per LA flat	Yes
TRICS for students – relevant unit is per bed	Yes
So you applied a ratio to the flats	Yes
Did you to the student beds bedrooms [trips for student beds straight from TRICS]	Not for trip gen Yes
	In temp non-self contained housing, 1.8 is equivalent to 1 LA flat
[from the London plan] [what for]	For calculating the delivery of AH As I understand, student ac and non s/c units 1.8 beds counts as a single home
[for calculating how much dev, is being put into the council's housing supply]	Yes.
TRICS done by student beds -	Yes – no ratio
LA Flats for future, so apply ratio	Yes
If you hadn't applied a ratio to the LA flats, what would have happened	Multiplying factor would have been 247 Flats so trips would go up significantly.
So, by applying the multiplier, you've decreased what TRICS would have otherwise told you	Yes – I thought that was fair.
Sticking with affordable flats. Para 5.5 You state one of sub-land uses is LA flats, and you apply multiplier and it drives down intensity of proposed use.	Yes
So only one site in London – discount because PTAL 6 Then, found 5 edge of town sites. Go to appendix T. A criticises these sites. Wrong to use site outside London	TRICS says shouldn't blanket discount sites on basis of region – should look at whole location/ptrans access etc/amenities

[How much anal of those site did you do]	I went online, analysed some google street view, looked at local facilities, did best with google maps to look at local bus/rail services – so a fair amount, but would all like more time for perfect piece of work.
Ref Mr Lewis – 5.3.18 – next point Car parking provision. Agree/disagree parking provision likely to lead to over-estiamte veh trips	Yes – and I ack in evidence – sites in GL tend to give more: car ownership is higher, and access to p trans is not as good. If you have somewhere to park, more likely to own and drive it.
He says appeal site in more accessible location	Disagree – site's profile , most have quite good amenities near them. Most have cafes etc.
Is there a supermarket in 15 mins of this site	Convenience store, run by co-op. bigger supermarket (ideally do on a low income) you'd need to go to ASDA.
Has A provided any sites that it says would have been better?	No
[why edge of town sites]	Because in my opinion that is similar to this one – its on the edge of Putney
[but still G London]	And still ack that access to P trans likely to be slightly different
[people live in London have a diff outlook to travel modes than people that live elsewhere?]	Yes -, in Oxfordshire – I found much more pressure for parking – then, yes inc Wands – much more focus to car light/car free – trying to cut to car light or car nill – cut use at source; elsewhere ack they need to be accommodated off street.
Re car free – is this controlled by CPZ?	No
Were there some London sites you could have picked; or of sites, were these most comparable?	I saw a site in Lambeth, but would have had to qualify that site 6B, so PTrans trips likely to be higher – and would have to qualify it in a different way. This site is 1B to 2 – the closer to access, the closer to the bus stop
Re the student use. 4.1 – you say you use TRICS – neither suburban or edge of town. TRICS offeree 3 sites with characteristics, and trip rates given at appendix P. 3 sites – re criticism of these: Mr Lewis 5.3.2 – Mr Lewis concern that PTAL was higher –	Admin that might have bumped up averages a bit
Would it have depressed vehicular trips?	Probably, because sites car free and in CPZs
Then next criticism that surveys under Covid – said to be unreliable	Think that is is 25 June 2021 – when there were some restrictions on social distances, but direction of travel was out of those. We'd had lockdowns until Jan 2021.

	<p>You could stay over from 17/05/2021 onwards.</p> <p>The country hosted a major international football tournament in June/July 2021.</p> <p>Direction of travel was very much out; students were back at their accommodation.</p>
When trics anal is run – not dealing with run of mill; is TRICS imperfect or perfect	Imperfect
Have you seen any anal by appellant as to likely trip gen of existing or proposed	<p>Not really. Its based on levels of car ownership and levels of on-street/off-street parking.</p> <p>That is a part of it, but my job is to assess impact across all modes</p>
What could the appellant have done?	<p>Maybe tried a bit harder to find a similar site.</p> <p>There are 32 London boroughs, they've all had a housing crisis.</p> <p>Find it difficult to believe there are no hostels for homeless people whether/not recorded by TRICS</p>
What could A have done	<p>A first principals assessment – so when A has developed similar sites, they might have trip gen data that reflects the use of that site.</p> <p>Eg deal with lots of sites for eg private day/prep schools sign up to condition to cap their pupils. A lot now want to increase cap to take more, so in case of going through TRICS – you do a travel plan, you've got good data – use that as your baseline. Even though no formal catchment – if current behaviours continue, what will net impact of 40+ pupils be -</p>
So a bespoke assessment	Yes, exactly
So say 6.1 comparison is imperfect, and you've applied a ratio.	My job is to assess impact on various relevant things
On basis of numbers – are there material differences or not?	
Are there notable differences in likely impact between student accom and dLA flats	<p>Yes – look at 3rd column from right – have sign increase in, esp private veh; in AM peak.</p> <p>This site is on a 1 way system, so it is an impact that needs to be taken account of.</p>
Notable impact	Yes
So ped for student would be underestimating	Yes because UoR campus further away

Were TRICs sites, campus uni's	Accom for uni's, but not on site
Distance?	Cambridge road eg, its about 25 mins from main Kingston Uni campus
These figures assume appellant provides 257 beds; if no's increase would be a change	Yes
Car ownership – We heard from A – views on car ownership. Miss C said some would have cars, Mr S said they probably wouldn't Have you seen any data by A on homeless/or student car ownership?	Not specifically. They used data from 2021 census, like me, just used it slightly differently.
How did you assess car ownership	Analysed at mid level (super output area) – eg neighbourhood wide, rather than ward/borough. Idea is it analyses within geog. Area closer to site. Prob I encounteres was that census table just offers you 'flat, maisonette, caravan, temp structure. That was mid-level super output area. Thereafter – used same method as Mr Lewis. Took total no, divided them into percentages and used ratio, because thought 1 student room is not the same as 1 household – so used 2.5 student rooms for same level of car ownership as 1 apartment.
Apply ratio of LA flats?	Yes
[the 1.8 ratio]	Yes
[based on council's housing supply requirement?]	Yes .
If hadn't applied ratio of any kind? In your view would that have overestimated or underestimated -	Overestimated, because would have been comparing 208 flats, with 257 flats.
Is there any national data on student car ownership you could have used	Not that I'm aware of.
Any for homeless	Not that aware of
Perfect/imperfect exercise	Imperfect.
As you sit here now, is it obvious there is a better way.	
Results at proof 6.7 – dif 22 cars between the two uses.	Yes
Dispute about no. car parking spaces – been to site and had a look – what is your view	When I went, counted 8 marked bays, 2 NE next to MC house. 3 more in NW corner.

	Having been there and used measuring wheel. I estimate scope to park 15 vehicles safely on site and save space to turn a (eg0 refuse truck.
Would not be severe, but notable	Yes – its an area that in 2021-22, Council approved development for a net increase of 820 dwellings across Daenbury Av corridor. That was a fairly car-light dev. We need to account that while there is not a lot of pressure on the on street parking capacity, there might be in the future.although only assess what's there in the future.
So ignoring what might come forward – go from c 50%-71%. Believe it would be noticeable.	
Comparing what we know about likely use by students – are you able to describe typical trip pattern of a student	If a big uni campus in 5 mins walking dist, the centre of their life while there in term time is uni campus. Library, where go for lectures, sports, gym, cafes, bars – they will socialise there. Likely to make fewer trips in trad weekday peak hours. Likely to walk/cycle/use PT more; esp walk more, because centre of life is 5 mins walk away
We know a substantial no. students have PT jobs, and knowing other facilities around – still of view that centre of life is campus	Would say so – Eg Maths = more teaching than humanities (eg), but you might work between 10-15 hours per week to earn, and might involve trips further afield.
In terms of temp accom – likely trip pattern. More intensive?	Yes – borne out by results – will try to get out to find somewhere better to live- won't be stuck in room; will look for appointments etc, People more likely to have children, will be looking for a job. If you lived somewhere and you owned a veh, but lost job and you had a car, no choice: Either sell car or take it with you Will be there beyond trad. University term times.
C4 – Mode statement 4.1.1 – was put to Mr L that there had been an agreed method for calc trips on forecast trips?	Disagree – wish I'd written and sent a note (expected them to make a note) But said assessing ownership and parking are part of the TS, but do need to assess across all modes of transport – because London and LP policy is to encourage people away.
Was that then reflected in the letter sent – appendix J –	That was comments on this document, sent to ST>

Ref to Kingston Road hostel yesterday – have you checked the TA for that	It seems that that app, submitted in 2018, the site used was one of the discounted YMCA sites. For trip analysis.
	Unfortunately, between 2018 and now it was archived.

Adjourned until 10.30 next Tuesday.

Day 5 – Tuesday 7 May

Housekeeping?

SV – arrangements ready?

Site plan available?

Mr Marshall XX

Talk through SV – dates, what, who etc.	Both site vis on own Second was 16.04.2025 – other was end march 2025.
How get there	By bus both times
How find that?	A bit slow, but I'm used to using busses, didn't make any odds
Left here,	Yes to Danebury Ave.
Vist UoR campus?	No – just the site Walked to centre where Danebury Av meet Roehampton La
Enter the buildings	No
When were you instructed not to talk to the app team?	End of the week just gone
Mr Sahota was sent an email by you saying you are not talking to us	Don't recall
You were never told not to talk to us?	No
Never said, we cannot talk to you, go through solicitors	Don't recall that.
What transport methods concern you?	As per EIC – my job is to consider trans impacts as a whole on dev sites – My colleague – PO says they have a proposal – cou student to temp ho – what are impaces?
Wht aspects of trans concern you	What amenities within walking dist?# How many ped trips where this is primary How many bus, rail etc – where that is primary mode Etc Et At the end, compare uses and see what net uses are going to be

Does it concern you with no. people walking	Have to account
Concern about either people walking, in this use class	My job to be considered
Material diff, student/temp	Yes – to the extent people walking dif reasons/dif places
[at this site?]	<p>Don't have perfect evidence, but I think there might be.</p> <p>Students have uni campus nearby, where library, computers, careers, welfare, bars, etc.</p> <p>Resident, would have to rely on existing public services near to the site/further afield.</p> <p>Homeless people often complex needs – appoints with other prof. etc, or need to come to them.</p>
Did not walk to UoR	no
How far	Aprox 5 min walk.
Mentioned uni facilities	Yes
Student med centre – 840 away, closer other facilities – closer off campus or on campus	<p>Closer re no. metres</p> <p>Up to the indiv student where to register.</p>
Heard campus only sat office	[ok]
Shops – campus café – 920 m Joy (local café) 730m Londis shop – 150m Coop -150m away Agree local facilities nearer than on-campus	<p>Would have to measure – 150 seems optimistic, but yes, coop, londis, joy café, may be closer.</p> <p>But when you are a student, it's a matter of indiv choice as to where to go</p> <p>May not choose closest, because friends are not going there who are uni students.</p> <p>Might choose to meet on campus, meeting friends/lectures</p>
Library – 965m Public 765m Agree if wanted to go to library and study, Roehampton Library closer	Yes – but about what they have in them that would be more likely to help you as a student
In your evidence, did you mark the distances? Do you agree with the table in Mr L proof at 2.-2 – agree comprehensive range in local area	Yes
Appeal students and to residents of a hostel	<p>Could be used by them.</p> <p>If student has an alternative, eg campus café to meet friends, cf. occupant here wouldn't know many people in area.</p>
On campus gym/sports hall – Roehampton gym? Similar distance – could be used by both	Gym, not for residents
Uni gym not free?	Doesn't surprise me
---objection re not in evidence ---	
[Where getting the figures from?]	Distances to uni facilities are not in evidence
Will move on	Correct

Mr M, you never walked this facility to the uni	
When get involved in this app?	The LDC?
When in the LDC	13.02.2025 – when ST asked to coment on the Mode statement
Go to OR – Were you involved in this (LDC) app while under consideration	No, nor any colleagues, to knowledge.
Go to OR (B1) – p14 In your proof, did you find this area was under parking stress?	Depends what mean by that – Lambeth methodology defines as being under parking stress to severe degree if on. Spaces occupied overnight is at, or over 100% total capacity. Dif authorities take dif. Views. But I Tend to accept that. I think more parking stress as a result of this application, but amount of additional stress would not affect safety of HW network to severe degree
Alton estate under parking stress	Its under stress, experience of other apps – parking always near the top of the list, but from survey and own obs – conc. Not under a severe level of parking stress
What % do you think is stress	Sveere is at or close to capacity – forces people to park unsafely. More cars would park on-street as a result of this app – stress would increase
Clear not involved from dates – so HW and trans not from you.	Did comment on earlier COU app, and colleague might have relied on that
So were involved in earlier app	Yes
When -	19.09.2024 – 2 apps running side by side
Is this, effectively your paragraph (p.14, par 5)	No it's ST
Reads para 5 – this isn't what you find in your proof	I said proposed COU would result in more veh parked on street. All I said is that the amount of stress would not have a severe impact on stress.
This says, area is already under parking stress – also says 5 parking spaces There are the reasons that this got refused. What you said on Friday and what doesn't tie in	In what way
Parking space numbers, stress is 100%	No – I said that is the on-street stress, but not to severe degree I said residents are concerned about space
When did you change view on no. parking spaces?	I found 3 others....
[how many do now think are there]	8 marked out
Inc. unmarked	I didn't do that assessment. Might be left for turning (inc large vehicles)

[did you put to Mr M, that he previously said there were 5 spaces, where]	[Mr G – para5, p 14]
[Mr M say anything]	Appendix G my evidence shows where I found the marked up parking bays
Do you accept this is incorrect	No – if under parking stress
Has it got 5 spaces, or 8	It has 8
So doc incorrect?	1 sentence in it is incorrect, doesn't make whole report incorrect.
So para 6.5 your evidence – you say stress level of 50%,	Yes based on no.s in para 6.5
Is stress really 50%	Yes – that's what I came
Are there many areas in Richmond or Wands where parking would be at 50%	Couldn't say Some higher, some lower
Were you aware C tried to acquire site	no
Go to proof. Run through start	Explained as per 1.1
Where did you study/experience	
Para 2.6 – reads sentence – re. state of the pavements -...ref, because homeless people... Aware these buildings are not DDA compliant? Not suitable accom	No, not written with a view to whether buildings are compliant Was view, borne out by my evidence in appendix F. Think more chance that people ref. homeless, judged priority need are more likely than 'every day residents' to have a physical disability
Are you aware this is not a suitable property for eg disabled people	I was not aware of that as not been inside buildings.
When writing proof, talk with anybody – do you know Dave Worth?	I know of him
What is his job	I think it is (as far as aware) to procure accommodation for people who present themselves to C as homeless
How many unit do you think his team run?	Can't say
They run 4000 unit	(no comment)
Would they have been best place to give info on travel, and has 1 st hand info	Difficult – have to treat all applicants the same, give/take adjustments – Re net impacts of sites, didn't speak to DW or his team, but re consultation, if he was interested party, he could have commented to PO and she would have weighed planning balance
3.3 – vulnerable people – is this why you assessed as sheltered ho.	As I said, I got confused. Sheltered housing is incorrect.
Can we cross out Sheltered ho column in table	Wouldn't – it provides a useful comment, up to those reading what to ignore or read.
YMCA use, - incomparable -	Difficult to use as a comparison, because of additional serv. Provide on site. Difficult to tease out trips gen by residents/visitors
Would you agree concl. Of report feature in 6.1 – does all analy come down to table	Yes, and the parking stress analysis.
See para 4.1 -PoE	That is overall person trips From trics

Re extant use – 321 person trips – where in table 6.1	
Where is it on table 6.1	Not there, because didn't incl total no. person trips
[what's the no. at the bottom]	All the column added up
Should that not be... where is 321.	
What is a person trip and what's a mode	Person trip – is a person travelling out
Text is 321, table is 532	Are you asking difference?
I don't understand it	I wanted to analyse modes
[should they be the same]	That's what I thought, I didn't understand the discrepancy
[Is there an addition error – VH Checked and seems correct]	
[where 321 come from?]	When you produce trics outputs, 1 table has vehicles, one for cycles, one peds One category is person trips Trics outputs not provided.
Who wrote the PoE	Me, on my own,
Input from anybody	No. I read other docs around the inquiry that were available, but my own work.
And you came up with this housing conversion yourself	Yes
Go to ST proof – E7 – para 6.51 Reads, about Mr M and ST – creates an illusion that you met the PO, you got together and came up with a story	No
You wrote this on your own and you know about London conversion rates	Yes, I talk to colleagues all the time
Is this common transportation policy, to take housing targets and use that in trans?	No, it's not. My prob was that I couldn't find an exact comparison to what you wanted to do So I looked at a number of alternatives and prob was that was comparing 208 student beds with 257 LA flats. As I said, I don't think it's fair or credible to say that would have same level of impact as person living in LA flat. Thought If I didn't use as a dampener, would be way out
Why not compare 208 students/208 hostels?	As I understand it you are providing up to 257 rooms as TA
But Mr Curtin and Mr S, said change in unit no.s is not a decision for an LDC certificate	
If you compare 208 student to 208 hostel units	Didn't do it, because I didn't think that was an accurate description.
If we go through LA – where are the figures coming from, and logic behind it	Trics assessments Conversion rates was $257/1.8 = 143$
Trics from what locations	Those in appendix T, and av. Across 5 sites
Where?	Lists
Comparable locations?	Difficult to say.

	<p>In some aspects, yes – all have reasonably good level of amenities w/in 15 min walk</p> <p>In Cardiff, Bristol, Cheltenham – all have pretty good access to bus services. Where not comparable, have higher off-street parking – and only 2 have any cycle parking of note.</p>
Also said, that travel patterns outside London/inside totally dif.	<p>Not totally different.</p> <p>Different to some extent.</p>
You used to work in Oxfordshire – what would be different	<p>In Oxford, broadly similar as 2 bus companies, with frequent coherenet/integrated services. Frequent rail to London, Banbury et.</p> <p>Outside oxford, there was a higher maximum off-street resi parking standards - that was the LP policy they adopted.</p>
So outside London, cars used more	Yes – I've accepted that.
Sites mentioned, on outskirts	Not all of them?
Where then – Bristol	<p>Outskirt of Bristol City Centre; so would have good amenities</p> <p>Just like this – edge of centre, but local serv centre on Danebury Av.</p>
Bristol 399 spaces – city centre, edge, out ?	Edge of town site?
Cardiff	Edge of town
Cheltenham -	<p>Prob edge of town</p> <p>So is this site</p>
So this site, where nearest train station	Putney
What zone is Putney in	<p>2 or 3.</p> <p>Would need a map to check</p>
Say London has 6 transport zones	Marked out on an underground map
Would you say Putney is outskirts of London	No.
Second Row, table 6.1. sites comparable?	Re facilities, bus service yes, although fall down in other areas.
Re general understanding – prof experience, what normally happens with car usage in London – use every day/use at weekend?	<p>In my experience, travel to work data – (2011 census, as 2021, not very useful) found that % people travel to work Richmond and Wands (only experience)</p> <p>Varies people commuting by car – 11% in this borough, can be up to 40-45% elsewhere</p>
What is the cost of running a car	Fairly expensive.
Would it be a luxury good?	No, and I haven't owned one for about 6 years, but know lots of costs
Any idea how much it costs to run a car?	
If go to Appendix Q Where is this	Mid leve super output 2021
This is what you expect car ownership	Yes – not linked to use
One is 26 (student), one residential (48)	Yes

Bring those figs to student accom – so, it would b 26 cars – marries to 54 movements in students.	That's 2 way trips Table analyses different things
In LA flats – you say 279 trips from 48 cars So one says private car trips 2:1 (54/26 – students) Other says 279/40 – 6:1 Is there any reason car ebing used 6 times a day any way realistic	No. But the 2 tables analyse different things And don't forget the analysed sites all have higher levels of parking
But if car ownership is diff levels: if car free development, would you expect to see amny private veh. All day units	no
Can you explain 2 nd column (table 6.1)	That is trying to assess impact 143 LA flats So for TRICS, multiplying factor was 143.
Para 5.6 – text doesn't agree with table with trips (651)	I don't know why – I just added it up.
Go to UoR letter – Is your anal of this based on the student's sole universe being UoR	Not sole universe, but would build their daily life around it...etc. Common endeavour etc... .
Do you accept that the uni campus/facilities are a diff distance to what you initially said	Obvs. Certain uses are further away than others. I guess if I'd walked the route, that is what I'd have found.
So UoR – Para 1 – student res could be/can be used up to 51 weeks. And otherwise used for commercial – does that create a year – round trip generation	Yes
Letter doesn't say used 30 weeks, left vacant for 20	Para 1 speaks for itself
Conferencing and rev. generating – people would generate transport	Yes
Point 2c – low income/deprived – less likely to have a car	Possibly correct
So these – cost conscious	Probably, like all students
How does your department analyse people's movements on low income	Don't go into that level of detail – don't have information in front of us
Don't know how people from deprived backgrounds...	No set tool to use when evaluating TS that talks about potential incomes of potential occupants
How do econ deprived people travel?	As they need – difficult to generalised Are they more/less likely to own cars, probably less likely.
But info is wide car ownership data	Mid-level census output
People in low incomes less likely to own than the data suggests	No – gives data at 'neighbourhood' (ish) level – and this neighbourhood in London context is quite a deprived one
How do people on low incomes travel	More likely to use public trans/walk. Less likely to own and use a car regularly

Would people living in a hostel be low income	Yes
What is difference between 'uoR 2.b and people living in a hostel	This will be their primary place of residence (in TA) – would have all possessions – might include a car
But you said a car is expensive	Doesn't mean people on low incomes don't have one. If you have a job and no other means of getting there, you will have a car if you need to keep the job. Will find a way to own one if you need one
Expert witnesses have not talked about cars --- objection --- they did----	
Council hostel report – E12 – not once does the report mention car ownership or parking Do you not accept the fact that people living in hostels would sell their cars	Depends if you need, how much time to sell
[you are a T planner – how much do you analyse car ownership within different demo. Profiles]	Not much – usu rely census data
[to what extent do you analyse behaviour of people in dif. Demo. Profiles]	It comes into it, only one factor. I don't analyse the likely profiles of development, but would take into consideration whether a site is in a deprived area, but not in – depth analysis.
Do you not agree Doc D2 – 2c student deprived background has similar transport need to those living in a hostel	Disagree Not the students primary residence Homeless people might have certain different needs Cursory look at any eg YMCA hostel – will give list of the distinct services
You said YMCA different	All saying is that homeless – if people need to live in a hostel – may have dif. More complex needs to students.
Even despite hostel expert saying dif type of hostel – and us being clear You make assumption that people will have complex needs	I say More likely to
You still conclude that they are likely to, even though you've been told they are not	Not sure what you are saying you have been told
Sheltered diff to supported?	Yes – sheltered usually over 55, self contained, but also communal areas
Not sheltered/supported housing scheme	I don't think it is.
[3]	Somebody who has been presented or presented themselves as homeless
[all have same sort of transport needs?]	No – some would be working, and – 32% might be in FT/PT employment – 18% had physical disability.

[DISABILITY – any info types disability?]	Not for certain – point trying to illustrate. Hostel accom, for people presenting themselves as homeless, more likely to accom people with physical disabilities than students.
[6]	Might do – if too phis diffult to use P trans or walk.
[5]	Difficult to say – likely that they would be similar
[know anything about these people]	Some analysis in appendix F – but no.
Aware difference between a Hostel (sui gen) and a Hostel, class C2 – one would have care, one would not have care – [I might need submissions on that]	Hostel Know C2 associated with care on site, because dealt with a number of those.
So this is different to those?	yes

Adjourn – 12.15-12.30

IQ – to Mr G: Confirm current definition of C1 and C2 – check that not to be suggesting that Council has considered the use as falling within those use classes? Hostel doesn't appear to feature in the words of C1 or C2.

Mr G – has been assessed as everything under the sun – inc institutional hostel and all sorts of other things . Thinks ref to disabilities indicates a confused approach.

Mr Marshall XX ct'd

[Is sheltered accom C2]	Understand usu C3, because not full or PT care employees providing accom on site. Self con flat + communal social spaces + warden
[any of your anal on a C2 planning use class]	No.
UoR letter D2 – agree income levels – D2 Do you think that can be put to hostel's too? Is the demographic the same?	
Point d – part time work – where do you account for that in your proof?	None explicitly – because my anal is about when and how people travel, not why.
Have you analysed that sign. Proportion study 3 days per week, and work (significantly) otherwise	No – think it helps to explain some of the table results
[table not UoR]	No – because no TRICS for that site
Cocl at 7.3 – PoE – reads... Main uni campus – access to uni library etc..	Doesn't say that

UoR letter eludes that most daily needs met elsewhere	
Engaged in PT work; engaged in other things	Confusion and misunderstanding in my role – admit students may have to work part time, and they might have to travel – this might be primary place of evidence – might work more hours – not disputing fact that students engage in PT work
Analyse the facts of letter	The statements
but 2c, 2d, para 5 – community facilities, 6, 7 so indicates that this statement – your conclusion that UoR is their universe is incorrect	Said they prob spend sign. Amount daily life there – much study/social activity
But 2d – 3 days per week	Depends course
Students on most programmes	
[is there a question] Doesn't match statement in 7.3	I said benefit – I don't know whether it provides for all of them. If you are at uni somewhere, you study, meet, eat, drink, play sport there – because friends course colleagues are there. Etc. Don't say spend all of lives there.
7.4 – pull UoR letter into conclusion – would their transport needs be similar to those living in the hostel. Mr Sahota – E5, para 4.80 – 60% occupants in employment – figure came from Council's housing team	Not here to dispute Miss C evidence,
Would 6/10 employed in hostel have similar trans needs to those students working PT, living in a hostel	Could be – depends on jobs, hours etc.
When wrote proof, were you aware that it might be used by others than the UoR	No. Students from other uni's might lead to different travel habits.
People not going to UoR, more likely to bike, walk, bus, etc	Depends on where your uni campus was and what you did outside study time.
Table 6.1 – Mentioned figures added up in Excel – reason that don't add up, is that because double counted?	Can't say for sure, reason gave person trips is because that is a category on TRICs. I wanted to anal trips per mode
<u>Private vehicle – is the 2 and 2 included in the 554</u>	Yes
So then added all up	Would need to see formula put on spreadsheet.
Where is the raw data for the table and its assumptions?	Don't have the raw spreadsheet data.
Why would AM and PM peak be included – then all added up – AM/PM double counted	So if that's the case, that is a mistake.
So mistakes – re. no parking spaces too	No that is visit to the site and marked out spaces

Inc garages in garage area	No, because evidence shows that is not always used for parking – see MfS.
PoE - appendix H – dispute over parking spaces and spaces to be included.	Yes
Irrelevant because same for both uses?	Yes
I asked how recent Lambeth Survey – says based on LP 2021 – do you think in 2021, would have been elec cars	Yes
[9] – method not really a concern, ballpark figures are correct	Yes
Appendix J – (PoE) A does not show plans Mr C – states 25 off-street spaces – Do you accept there are 25?	At time of writing, wasn't aware of this doc Prepared to accept the spaces, not marked out and wouldn't like to turn a lorry.
Appendix K – former DfT guidance – now archived -	Yes
Out of date?	Yes But for asking what should be in a trans statement. V clear and well written guidance. That has not really changed since 2014
Guidance now in PPG – States = para -004 – where not significant, might not need TS/TP, 007 – should be proportionate 015-	I agree with all of those.
So assertion that must estimate no. trips is incorrect	No – I say that forms an integral part of any quantitative assessment of trans impacts. If you don't know existing/proposed/difference, what have you got?
So what are we assessing – we have Porr students that may or may not go to UoR and poor residents	Can only hypothesise – can only analyse propose trips per mode
What dif in the mode of transport will they have?	I think It is likely m ore car trips and more ped trips. Because their daily lives are dif
But are saying homeless own 48 cars	No – I'm saying assuming site fully oc at 257 – likely to own 48 cars if local car ownership habits play out
20% hless own a car	I don't know
And they drive it 6 times per day	<u>Not an exact science.</u> <u>It might be people driving to visit them – not nec resident making that trip.</u>
Appendix O We can't understand this logic Struggle to believe came up with by yourself	Honestly I did

No point going through O – don't understand it	All I will do is reiterate what I said earlier
It is to analyse performance to anal. Soc ho. Del – and nothing to do with it	Not credible/fair to say it would be the same as 247 flats
But you have a housing team that operate 4000 hostel units, you could have got info from them; understood car ownership	Probably, but I can't say
They'd probably have a report	
Do you think they know work/travel destinations/modes – would they have an idea?	Don't know – When I get a Planning App – there are certain things that I have to do – all planning applicants are expected to do similar things Have certain tools – to use.
Have you ever done a hostel application	Not of this type
Have you done C2	C2 extra care – yes
Nothing like this	No -that's why faced with the dilemmas
You had a department that could have given you the info	It didn't occur to me
We asked them to com here	Nothing to do with me
Have you seen anyone else use these multipliers.	
[26]	I don't think what was being proposed – hostel use, admit from DAS for COU – a hostel use with a bedroom/ensuite bathroom – so didn't think it was credible/fair Because took the view that if these people weren't in the hostel – where would the be/want to be – concluded that LA flats is nearest equiv
[why a reliable weighting]	A consideration of any planning app for aff ho – one of the things that come forward could affect the planning balance; eg how much AH do you intend to provide/how can we calculate that – contributes to delivery at this ratio. [so can't really say]
[19]	Yes
[20]	Ward v. mid level Mr M is mid level
[20]	Yes
[23] – include various types of accom?	For purposes of census in same category
[Could they have dif occupancy levels, within the category]	Yes – could choose no. residents – I selected 1.
Did you chose 1 or 1 or more	1

[how reliable to apply a weighting to the whole group]	Can't say – don't think 1 person living in a bedroom, with some communal facilities would have the same impact as 1 household, albeit HH with 1 person
Appendix Q – sole driver is the ratio	Yes – see 4.1.9 london plan guidance. 1 dwelling is eq. 2.5 student rooms. And 1.8 ratio for communal living space
So even though exact same no. people could be living there from same socio-econ group – they would have totally different car ownership levels?	Yes – but used same percentages across mid-level super output area
If you assessed 100 student units/resi would be the same	Yes
In table – ap Q – people living in 12 sqm rooms – 8 cars own by 4 people	Yes – that is an anomaly using this data – some people in a 1 bed flat do own more than 1 car – but not many .Might be an enthusiast.
Appendix S – agree that stepped away from sheltered – would you agree that the locations are crazy?	Could argue this is suburban,. But agree hard to find
Suburbia/Scotland wildly different	
Appendix T – looked at these	From desktop
[we've been through this]	They all have strengths and weaknesses 1, 2, 3 all good bus servs and amenities nearby. but fall down on car parking.
Do you think these are comparable still	
Fri you said more likely to own a car if you have space	Yes makes it easier
So 399 spaces, much more likely to rely on cars.	Yes – don't know exactly what policies applied/when built out.
Are think you were put in this position from the OR – where you had to engineer this – you've come up with story after story – different uses.	Yes My job is to assess net impacts across all modes, if COU to occur. Must do some form of quant anal to reach a conclusion.
Come down to – do students and homeless people of similar econ property – all advice we have from our experts – says largely don't own cars, walk, cycle PT	Imperfect, but least imperfect of all options. I've qualified my evidence and used what I think is the least imperfect way.
[Mr G – signpost these in closing please]	
So you said no better way to assess trans impact here – do you still stand by your analysis as being the most accurate	

IQ

[1]	Would need to know size areas, to do a TRICS
[not accounted for]	no
[7]	No, but when do assessment, we have a look –

	No relevance for this LDC
[12]	Admit was surprised by result
[13]	They are student sites – would be higher as a student room from the other sites because better access
[so useful for this site?]	An anomaly.
[16]	Because of sites, can't give value.
[17]	Just because low income doesn't mean no online shopping – eg supermarket shop And hostel use, understand A is offering up to 1 year tenancy, but could be faster turnover of residents – may be more vans etc.

RX

Re offices – what about office to resi pattern – different or the same	Dif, because more likely to arrive in AM peak, depart in PM peak – depends on occupier of the office
Criticised by A for using 257 rooms – See Mr L proof – table 3.1 – how many rooms has Mr Lewis used	257
Again, you confirmed in EIC, but if additional rooms were provided on site under the proposed use, what would that do the differential trip nos. and car ownership	Would likely increase both.
At 6.1 – just confirm – eg. Private vehicles all do – include or exclude visitors -	Can't say, only say when and what mode.
Its trips in and out	Yes, but one explanation might be that residents on low incomes and not owning a car could be other professionals or relatives needing to visit them.
Re conferencing activity at MC Have you seen any evidence of that	Not on my SV or docs
Was put about other uni's using MC site?	No – I just saw the livery on the signs and assumes used by UoR
<u>Also point made about more than 1 accom unit – owning more than 1 car.</u>	Yes
<u>See Mr Lewis – table 5.2- does Mr Lewis' figures also have units for more than 1 car</u>	
No CPZ -	No
If if resi in TA has a car – would they need to pay for parking	Off the site – no.
This isn't a planning app – who has to demonstrate burden of proof	Appellant
Anywhere in appellant's evidence that you find data on travel patterns – students/proposed	Not quantitative Because Mr L admitted v difficult to find comparable sites

Qualitative evidence? Do you find any here	<p>Yes – but only so much qualitative evidence you can do</p> <p>Found that if take that approach, you end up arguing that if 2 different scenarios and nothing changes then they have access to roughly the same things</p>
Both resorted to the census – re ownership Has A provided any more than just general census categories when looking at ownership	<p>Not that I can see</p> <p>Re parking – this is only one aspect of a TS and what should be in it.</p>

End.

SV arrangements

Adjourn until 19 June 09.30.

19 June – 09.30

IQ

Planning ob received Timing poor – C seen it? / reviewed it?	
How does this work – because I need to decide if at the date of the application, the use would be lawful?	Submitted because of red-herring where C getting confused about term hostel and TA and reiterates in a single document what appears in a single doc what appears in app form.
Comes into force on grant of permission – there isn't one/won't be one	The permission is the grant of the LDC.
If appeal dismissed – would have no effect?	No effect
Permission isn't defined	Can have it amended.
Existing use isn't defined?	No
How can you have an obligation that the use won't be materially different?	Based on assumption that we are commencing as a hostel and ending as a hostel, which is based on the application form.
C → Do I have to accept this/take account of it, because it might have legal effect in the event that I allow the appeal, regardless of whether I accept it now – and so I need to have sight and consideration of it?	<p>There is a distinction between whether a S106 can be made and whether a MC</p> <p>Any land owner can enter into a S106 conditional on it.</p> <p>Q for me is whether it is material to my decision – that is separate. C observation would be:</p> <p>Under S192, whether any particular proposed use is lawful. Set out in app docs – here app docs were ambiguous and following A confirmation use we've ended up with is TA.</p> <p>S106 can't change what is in app docs, can't change current use of the site – can't rep proposed use and what has to be determined.</p> <p>In any event, if there were to be a COU in hostel – doesn't address A fundamental problems. How would this be enforceable by C.</p> <p>Prob for A that use keeps changing.</p> <p>Second point – S106 obligation is inc obl 1.2 – existing use is largely vacant – vacant stud. Ac, MCH vacant, some uses in PH.</p> <p>If obligation said lawful use; that's different.</p>

	<p>It's not completed – it's not dated, no def. of permission</p> <p>A has not deduced title – there are 2, and 3 pending applications with the Land Reg.</p> <p>Freehold remains Trustees of Meth Church – not clear whether AKA has title</p> <p>Certainly at one point UoR had lease until 2026 – they are not a signatory.</p> <p>C position is, that A free to enter into any PI ob – but it cannot be a material consideration.</p>
Say that can't be Mat Con – because not completed	One reason, and also because of S192 is was it lawful at app date (so my earlier point about whether it is material at point of decision is irrelevant).
A → Anything else to say	We can make changes and resubmit
What changes?	Def. of permission – existing use (based on lawful use) and title
A → How can it be MC?	Difference is just in the occupier – our stance is that starts as a hostel, ends as a hostel.
Is it relevant to me?	<p>Doesn't change anything; facts are in the app form and letter.</p> <p>Clarifies misleading position – about hostel/TA – one describes physical building and one describes use of it.</p> <p>Proposed use on date of app is consistent with that on date of permission.</p>
Objection to accepting it?	Will take instruction
Also if amended	<p>Title can't be done today</p> <p>Problem that see – and one reason C asked to rule on what the definition was – is because of potential for shifting definitions.</p> <p>If now going to use this to argue that definition now changes and don't want to open up ST to XX on a point that ultimately irrelevant.</p> <p>Not heard a legal basis for why can rely on it – then what is the point.</p>
Will you need to ask ST questions about it? (timing of adjournment for full review?)	No
Will return to this later and review in adjournments.	

Siri Thafvelin

EIC

Intro credentials and quals	All correct Now 10 years experience
Were you the officer that wrote OR and took decision	Yes
A appears to allege that decision was directed by others	Not the case
Anyone pressure you/ask to reach any particular decision	No
App docus June 2024 – those docus on which based OR and decision,	Yes
Then SoC, historic docs and since, PoEs – Oral evidence and SV	Yes
Did you have full info before you when you wrote OR and Dcn – or has more info come to light	I've received a lot more info since – app had covering letter outlining general history, KC opinion, drawings of most buildings, but not all – now a lot more re history and use by UoR and potential intervening uses
[scheme of dev]	My recom, signed off by the manager, then issued with strategic head of dev as signatory (Mark Hunter)
[authorising officer is manager]	Yes – Planning manager (Janet Fergusson – sig is on OR)
Please account all evidence now before the inquiry in answers	
Planning history – re Garnett col – where would you expect use to be described	In descry. Of dev on DN
In historic docs – para 5.4 in proof – see F2 – p78 – what comments would you make about this?	It's a report by architect – Talks about proposals to replace GC – split across 2 sites – seems to be early days; ref. to drawings and indicative dwgs across the 2 sites – descry outline scheme for a training college project
So we know we have 2 sites – 1 scheme or 2	1 scheme across 2 sites
At 5.14 – say indicates a formal doc indicates permission will be made	Yes – see point 6 – then in recom says app will be made along the lines of the outline scheme.
F2 P84 – at 5.19-20 of PoE you comment – what would you say about this plan	It's a site plan; shows MC site outlined with various buildings on it – it's descry as GC – MC, Roehampton -
Have seen plans A brought to Inq – is info on those materially different re what they depict	Can't recall revision nos. but broadly similar.
Eg Does phrase GC used on each of the plans	Yes – GC MC, (on F2 P84 it's written across bottom of page Some slight difs on the plans – principals res and garage in dif locn's but

Does each label principals ho	Yes, and all say GC
Dining/staff block	These are on P5 rev B, not labelled on on the other.
Can you discern use MCH	Not from plans
Do they support that permission given for a bare hostel?	No clear that for GC as an educ facility with various parts of it – staff/dining facilities/principals resi – collection of college uses
Re F2 – p86 – (POE 5.22/3) – what comments on this?	Its another doc that talks about appropriation of MCH for educ purposes –
Ref to HoR and Hostel – is there a distinction to be made?	Think consistently descry as GC, then uses dif elements of the scheme in dif ways, but always part of student scheme
How descry. SA today	Would call it SA
Distinction that and HoR	If part of educ facility woulud see it as a sub-category as SA – would see as synonyms
And hostel?	Interchangeable HoR and SA
Re plans on college – is use of word Hostel different to HoR	In this context it would be SA – because in context of this proposal it wouldn't make sense to have a dif type of hostel – it just reduces the writing on the dwg.
F2 At p89 – (Poe 5.25) is use of word Hostel any old hostel or a spec type of hostel?	Its all in context of rest of blgs that make up the college – always linked to GC as a student hostel
F2 – p.92 – (Poe 5.30) – comments	Talks about how ctee approved outlie proposals – then detailed schme now being prepared, then recom ref to no. of dwgs – have not seen those
At 6A cttee approve....	1 scheme
1 scheme or 2	
Don't have DN, but from recom – if you were to consider likely descry of dev – what would it be?	Training col is how it is described in 1 st para – recom is training col – and spec says use by GC, but def. training col and HoR
F2 P.99 – don't have column headings – what say about contents columns	1 st is that includes both sites as dev sites Then descry dev and erection col and ancillary buildings Resi – not sure what that is about – could be that land was zoned for resi because talks about appropriation of land for educ elsewhere. Next column is location ; don't know what last 2 columns mean
Report - ...now proposed to provide a college... reads... was the training college only on 1 site	It was across both sites – DH and MCH
Word hostel used	Should be seeing all this as one scheme – providing hostel blocks as part of ancillary buildings to the wider college

So, overall; do you consider A demo more likely than not that pp for MC for a hostel use?	No – it is a college use that includes HoR as part of college – and seen as a whole
Change if this were a deemed planning consent	No
PoE 5.66 – do you remain of this view	Yes
Do we know exactly when GC vacated	There is ref to 1987 – p.45 of PoE – that's based on info from UoG website
Best we can do?	Yes We also have title deeds showing transfer of land 1989, but not clear when GC left. Would have been by 1989.
If GC left 1987 – then transfer of ownership in 1989 – do we know what site used for after GC left	No – no info
UoR since 2001 (CD D2) So 1987-2001 – any evidence about use of site	No
Use by UoR – 5.50 – D2 – para 8 – Had you been inside when wrote PoE?	No
Heard about Mr Mills evidence about MCH From what you've seen of MCH – has A demo that use MCH has been ancillary to SA?	No – it was described in v little detail But evidence since then suggests that it has been serving whole uni rather than the SA
See your appendix A – (the totem sign) Does this look ancillary to student beds?	No – don't know why SA would need these things
Mr Mills gave evidence that Mr Mills visited a lecturer From what you saw SV consistent with office use in recent past?	It was complicated by the use as a film set, but it had all sockets and laid out for office use
Accords mr C	Yes
How long office use MC -	UoR said no communal facilities in MCH and they used as offices.
Is there any evidence since 2001 that MCH has been ancillary to SA?	No – evidence indicates it was specifically not ancillary to SA?
Proof para 6.9 – you believed there was a dining block at PH – does this remain view	No couldn't see a dining block – GF mostly used for storage; didn't seem to be used as a dining block (from obs at SV)
Can you rule out dining block	Tells us most recent uses – eg covid sanitation stations – last 5 years No can't rule that out that was ever a dining block, but doesn't seem to be current use of building.

From UoR evidence from appellant – any evidence that PH had dining facilities	No, they ref to housing visiting lecturers; nothing about dining facilities
As SA/TA laid out – where are kitchens	Each block has own kitchens; wouldn't be a need to provide separate dining facilities in PH for the students. Each of the flats on FF PH have kitchens too.
One thing we do have from UoR is lecturer accom in PH – would lecturer accom by ancillary to SA	No, ancillary to an educ provider.
On site you saw a storage use. Were you aware of the workshop before writing PoE	No
Able to say whether that is/isn't ancillary to SA -	Can't say how its been used, but can't see how workshop would be ancillary to SA – to the other uses, but SA is one of those
Storage, can't say how used, but appear ancillary to SA	No it seems to be part of the refurb of the student blocks, but then other stores suggest were part of the uni, not just SA
Re timing, when did students leave the site?	I think 2021 – see UoR first letter D1. Indicates not ancillary to SA, because if SA no longer used, then if it were related, it would be empty.
Know CAB – didn't know that at proof – know how long?	There is a lease that shows moved in 2019 – see PoE – Appendix C – p 24.
Assuming that was date CAB took occupation, know what use was prior to CAB?	No – no info about that.
Looking at UoR since 2001, any evidence that any uses have been ancillary to SA?	No Don't think so. Don't know about any eg dining facilities, lecturers accom not ancillary, CAB def. not ancillary to SA
Looking at site as a whole – we have GC, then a gap, next use we know is UoR – Given what we know about UoR – is it likely that UoR dif to that originally permitted	Yes – started as larger college, now a collection of uses on one site – separate office use, lecturers accom, not ancillary to SA, and SA no longer ancillary to larger col.
[Single PU/separate]	Think red line is single PU, with mix of uses, severed from original PU that would have inc DH
[SA no longer ancillary to larger col?]	When descry original consent – Training col with ancillary to GC, but can no longer be ancillary to that because doesn't exist
[could not be ancillary to UoR as larger col?]	Now SA is purpose built it can be used by any – not ancillary as such – Alternative look at whole UoR as one PU -
[talking SA generally now]	Yes, this is my understanding – no longer tied (although it can be) -not tied to a spec institution
[why dif about the 1960s]	Because it was viewed as a whole – it was one scheme – the place you go to study

	<p>and the place you live were very much linked and as a whole they were acceptable. – they were intrinsically linked.</p> <p>sA doesn't tend to be in most cases any more – GC was more like a residential college – like a boarding school – one scheme.</p>
<p>So gave view earlier that permission was likely to be for a training col.</p> <p>Looking at MC site now – as one PU (both parties have treated it like this). Could it reasonably now be training col and ancillary buildings</p>	Now – no
<p>Can't be completely definitive about UoR use – appears to be a mix of uses.</p> <p>Now – if there are a mix of uses, inc office uses – A accepts a change to TA would be a MCU. Won't asked Qs.</p> <p>Mr Sahota said it is a Student Hostel and everything else is ancillary. – we'll compare that to the proposed use.</p>	
Adjourn 11-11.5	
<p>P.49 – PoE – table –</p> <p>Re HoR column – having heard evidence – do you remain of view this is a fair summary of HoR use</p>	Yes
Are these characteristics typical of SA, or tied to UoR	Yes – general characteristics of all student HoR
Re use being sought 'TA' – turn to CDA1 – para 5 – app form said hostel. Was a dif between how uses described – turn to F2 – what did you base descry on	On covering letter
On 8 July – had email on p 7 – what happened in response	Was sent to tech support team and then tech support team confirmed descry changed without discussion from me.
What happened then? It changed again – p9	I raised with Mr S/his colleague that descry changed wo/ my agreement – wanted standard format, inc a simplified version removing part that was Mr S concern – re COU – so now just says use as TA
So removed a lot of the unnecessary text.	The wording about there being no MCU not inc in descry, butcause purpose is to determine if is lawful
So content with temp ho descry	Yes
So at time of app –you told about nature of use – p.3 –	Difficult to define – certainly 1 year tenancies doesn't sound temp to me – similar other agreements
Re TA – what range of stay could this cover	
Could it be a night	Yes night, week, moth etc
Type of people	Any

Would it cover a hotel	That is a form of TA`
And C3 units -	If used temporarily
HMO	If it is a hostel style HMO where place people for short period – could fall into TA
If descry had been a hostel – would that prescribe length of stay	No very broad and covers all sorts of hostel uses
Re type of people	No restriction if just a hostel on type of people
And if TA	Same
And who paying - would that be stipulated	No
Could a hostel in TA amount to an HMO	Yes
Is it possible to have C3 type units as part of a hostel in TA	Yes – could be v small units, operate similar to C3, but used as TA
If descry is TA/ or Hostel in TA – is there same issue re breadth of uses that may cover	Yes – as an LDC – there is no way of restricting anything, eg lengths of stay etc.
In OR – based on what you've been told about nature of use – may be more like HMO – now have evidence Mr Curtin – from what proposed by A – would they be HMO/C3/can't say	It would allow all sorts of configurations But drawings suggested they are stand alone resi units
Might the small size lead to being hostel v C3	Don't think size matters
Could there be additional units on GF PH -	Yes
Could there be double occupancy	Yes
[objection that Mr C didn't say would there be children in bunks]	
At app stage were told 1 yr tenancies – now Mr S says 3mth to 1 yr – and Miss Cooley said could be 1 night – typically 6 months Clearly a range about what occupancy would be When consider range, cf. typical student – materially different or not	That is materially different SA – cohort arrive at same time; would live together for next (probably) year – and common endeavour If have variety of stays – people come/go diff times of year – v different pattern; constant coming and going of people. V Different character.
Mr S said oc could be couples and families – clarified he meant couple. Taking occupancy by couples v TA – is that MCU	Yes – depends if 1 couple out of 200+ rooms – might not change whole site. But would not preclude this in all rooms and sign intensification
If children	Yes – that would be totally dif demo – and v different needs on facilities
Re likely ages of the homeless. UoR – said mature students were over 21. And Miss C gave stats on likely ages. Is this material?	Age on its own is not necessarily a determining factor – but can be indicative esp where not common endeavour at uni – where others at dif stages of life – can be indicative of MCU.
But age goes to common endeavour	Yes
A proposing/started reconfig. Accom internally – providing en suites; removal communal kitchens/bathrooms – indicative MCU	Shows going from shared living shared toilets/kitchen used by 12 resi together to very stand alone units of accom.

Reconfig put forward by A would result in uplift to 261 (inc principals house) – know may be double oc – but uplift in no. people – is that indicative MCU	Yes – if intensification would result in v diff off-site impacts; transport needs 200 v 261 rooms with 2 people in each – v diff to 200.
Re patterns of daily life – students v. temp accom homelss person – have you visited UoR campus recently	Yes
What facilities?	Lecture halls, main campus has shops/facilities/leisure/accom and v nice grounds.
Where would you expect centre of gravity of student to be	Main campus buildings
Use local facilities at all	No – they would top-up show locally; but their lives would centre around uni, cf. danebury av shops etc
Is availability of campus facilities and use indicative MCU	Yes – others would not have access to the facilities available to students Addl. Healthcare, library, employment, schools – indicates MCU.
Employment patterns? Need to consider	Yes.
Re student timetable – what likely empl pattersn	It would be PT to fit around studies
If not resi in holidays then what would happen to jobs?	Likely to be summer jobs/weekends Not career jobs
Effects on healthcare	G7 – p2 – re mental health probs/disability/dependency Shows v diff overall health picture to what I would expect as a student.
What services does UoR offer for phys/mental health	Counselling/GP
Amenity impact – C5 – does it support same/dif amenity impacts?	It says ...reads... far greater risk noise from SA to TA – so that suggests there is a clear difference in terms noise impact SA and TA
Re policy treatment –	LP28 – protects SA LP29 – protects shared facilities – Resist large scale purposes built, except – certain criteria.
So does separate policy treatment indicate materially different	Supports they are materially different
Do you remain of the view that proposed use reps a MCU, even if correct to focus solely on SA -	Yes
A ref. to FOI correspondence – F2 – Broad allegation is that planning team had assured housing team that PP would not be required – is that the case	Not seen anything to suggest that PP not required.

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Go to Uni	Ox Brookes – U o Sheffield
What courses	Cities, Env, Design and Dev; masters Conservation and regen
Area of focus	Planning and env
Dissertation	Regen
On leaving uni what do	A few jobs, then start working in planning
Join wands?	In 2019
What initial job	Senior PO
What team – how teams formed	In strat dev team – sits within planning dep; divided E and W – and Strat. And strat team deal with regen areas – Alton Estate is one.
So team focus on Alton?	Alton is one of the areas of focus
You cover every regen site in borough	The 3 mentioned
How did you end up in that team	A job advert.
Why not in wider planning team – why in strat team	Because there was a job there. It has sat separately to DM, but still in LPA
How decisions made	Same as rest of planning authority
One person/team	Depends on scheme – sometimes have several officers on one scheme – usually it is dealt with by one
Is this a major/minor scheme	Its not a planning app – so falls outside major/minor
Would it be allocated to one person	It was allocated to 1
For a big scheme like this	Yes – usually one officer; pull on expertise elsewhere if needs be
What other schemes are you working on	Battersea gardens/powerstation Scattered across
Who manages the team	Just changed – Mark Hunter was head; and now sit under the DM team from Monday
When this app submitted who managed team	Mark Hunter
Who do you report to	Janet Furgusson.
She is immediate manager	Yes
Are you based in room 57	Yes
Who else?	Dev Man group – Don't have set desks – people could come in from other depts.
Mr Hunter/Miss F both in 57	Yes
How often come to work	5 days, but in office usually 1 day per week
When first involved MC	Pre- app 2023.
Proof at 1.5 – says visited site several times – when	Don't have dates and times
Who with	Visited as first pre-app – with urban designer and cons officer. And then with manager (Janet F)
Twice is several times	Been since... I've dealt with other apps in area and visited for walkover. First time visiting was 2019, and then regular site visits to see area

You never visited site during 131 day process this app	Not during this app
Didn't enter buildings before 2 weeks ago	No
Didn't request to go in	No
Proof 3.3 – you didn't visit – most facts wrong – not a folly building, parking spaces wrong, it is a pre-meditated opinion. 3.5 was another pre-app but coincides with time Council looking at another pre-app for the site	Went on these dates – can't remember who with
In OR, no ref of CAB – it's blatantly obvious but not mentioned in OR. Any reason	It is taken on ifo at face value focussing on student accom. In retrospect could have been avenue to go by
Mentioned in proof/but were you not aware before	Took evidence submitted. Didn't give any weight to existence CAB in change of use consideration
When aware	Know email that says (F2 p 131) Says MC on market – then I'm referred to as the one to contact. All I was aware that Council were bidding/and if bid were unsuccessful
Janent F and Mark H – would have known did they not tell you	Not that a different part of the C were considering buying it
So you are admitted you are copied in to the FOI	Don't know names are redacted
I think your name is consistently redacted	She was planning manager at the time
Is J Ferg redacted -	I can't say that I am copied in. not something that someone at my level would be copied in
But you are aware C bid	I am now
In 2023 -	I don't recall that in 2023 I was aware of whether C ended up bidding on site or not. Think there was talk about discouraging it – that is in these emails. I was not aware of any details of the bid at that time.
For validation – how works	Goes tech support – forwarded to planning, goes through docs, checks valid and completes reg process. I'm involved from when allocated to officers to check docs
Who wrote descry. With word student	I did
Why	Because in covering letter and descry.
Show me where in cover letter	D1 – p3, final para – it says COU from student/hostel to TA would... says that current use is seen by applicant as TA.
We never described it as such	That was your description.

What about app form? Descry as hostel	Yes
You ignored that	No, I thought not specific enough and got info from covering letter
It was soon changed. Who advised on the change	What do you mean?
The descry.	Oliver at NTA asked for it to be changed, then tech support team changed it.
In the covering letter – says it falls within the permitted hostel use – it never should have been called SA	I think that SA is still an appropriate descry. Based on info now submitted, I think now should be a longer use, that should include offices.
So the app form says starts hostel, ends hostel.	Yes
You didn't seek any advice on change of descry.	No
You just did was asked	Nothing was asked other than here is an app, please validate. I don't recall consulting with anyone about the description.
Proof 4.2 is it clear what is applied for?	It says temp housing, but as discussed throughout inq, this is a very broad term
Did app form say starts/ends hostel	Yes
Did app letter say to house homeless people?	
Has to be clear	No it is such a broad term?
What is broad /complicated	I think for planning purposes they are very broad terms that include a wide range of uses. A hostel can be all sorts of things, - nurses, youth etc. very different uses, even though falling under umbrella of Hostel – means very little without further adjectives – student, youth, backpackers
Why not put homeless people in description?	It didn't come up. T Housing seemed appropriate at the time to keep it concise.
Fail to see what confusing – used phrase TA 22 times in the letter, what not understand?	Not a question of understanding, it is just thinking it is a broad term when coming to assess MCU
Its combined with word hostel – what is broad	The nature of the use is still broad, no matter how many times the phrase is used. It doesn't provide any more colour
How	TA could include a wide range of uses – bedsits, hostel, hotel,
Is this a hotel	We've tried to define the COU.
No in app form says hostel – where these other terms come in	They are examples of a broad range of different uses that could come under T housing
But TA isn't on its own – its combined with hostel throughout	Not saying it's a hotel – not sure what you are saying that it is combined
Is it clear we thought it was a hostel	It is consistent that you think it is
Clear from A1 that you understood it was for TA to house those on council's housing list	Yes
Existing/proposed use on app form – hostel	Yes

Covering letter – P2, para 5 – please read it is understood...	Reads...
Any evidence that is not true	The site has been used as offices/and also now by CAB
Apart from that? Anything not used like that sentence	Yes, MC has been used as an office building, not as SA Understand principals house never as SA; don't think PH was necessarily part of SA – not clear who dining hall served – students/lecturers/both etc.
P2 – read final para	It refers to KC opinion and ...reads...
Pretty clear what applied for	Shows one potential use of site, as a hostel Focus is on transient, which is not aligned with comment about 1 year tenancies – not particular transient
What physical changes applied for	And LDC for use wouldn't have any, its about the use
Physical alterations are irrelevant to this inquiry	Yes
F2, p9 – why change descry. ?	As per email, says descry was changed without our agreement – says too prescriptive – say exclude some words – to shorten and try not to reintroduce part of my original descry that I think was objectional – i.e. change from SA and assoc use to TA and it was the COU that was the problem – but concl that for T Housing would not constitute MCU – 'would not constitute an MCU' would not normally be included, as that is the purpose of the app.
But you changed it	Tech support changed it
You don't always see that	I was copied in but was done before I responded.
Seems odd that at one point it was too prescriptive, now you are saying its not prescriptive enough	Now saying TH covers a wide range of uses – that is not what I'm saying is too prescriptive – I'm saying it was the 'would not constitute MCU' was too prescriptive
You'd already decided to RF by then	Yes
Chose not to speak to applicants?	Correct
Unreasonable?	No It was based upon the info that had been submitted – was the decn came to. Its not always necessary to go and ask for info if that will not change info
Didn't ask to visit/get into buildings	Issue is not about that – wouldn't have led to approval – would have helped know about other uses – eg principals lodge/PH –

	wouldn't have clarified the other issues before inquiry -
Why take 131 days, not 56	Just a generally high caseload
Much dialogue with A	No
Respond to many/any emails	Can't recall. Had p app for site at same time – can't recall what I received from A about this app during that time
Can't remember responding to any emails from A	Can't remember
In decision process, what depts/people interact with?	Planning app – transport, but nothing on LDC
Not housing team	No
Transport	No
No senior people	Through most applications – officer would ussu go through docs and form an opinion and then discuss their view with senior in 121 or team meeting to check not going down the wrong avenue – or there is something not known put on table. But not to influence recom, but to ensure reports don't arrive out of blue on managers desk
Who were you reporting process to	Line manager/Janet F
And Mark Hunter	He might have been at some meetings, but not 121s.
How do you typically report your progress – weekly meeting?	As and when needed. If have a query, will raise it/collect queries/or bring to a team meeting – informal
Were you aware of discussions with housing team	No
When	In FOI requests
What do you think about Mr H saying to Mr S that decision was being taking above him	I wasn't aware
Mr S was clear, and Mr H was aware. Mr H must have been taking instruction, so must you	I was not taking any instructions. Absolutely no instruction to decide one way or another. Esp from ho team. Would be v unusual for other depts to be aware of LDC app.
On SoC drafts – why Mr H name on drafts	Because as head of service, he would normally sign that sort of doc. But he was on leave that week, so, we changed it to Janet F.
Aware that tried to have it called to committee	Don't recall LDC being called to cttee. Don't think that might be possible in scheme of delegation.

	Think there was a request on the planning app; not the LDC.
We asked for everything to go to cttee.	I was not instructed to RF the app?
You say you weren't instructed to RF	
You were left to your own devices	Yes that can be left to a senior officer
Not aware anything strange going on?	No
And really takes over 56 days	Yes – it happens
Did you come up with sheltered accom notions with transport planner	We discussed – then I spoke to Mr M as part of the appeal because trans statement submitted with appeal There hadn't been any substantial trans info in the LDC app – there had been nothing to coment on
What facts were you relying on?	Info with app
Not consult anyone – trans/housing	That wouldn't help – they are not planners, and the issue here is whether MCU, not whether housing might want to house people here. They don't have planning expertise
They know how homeless people behave	Don't know that they have detailed transport data Issue was how use defined – that is a planning matter – not resolved by speaking to ho at that point.
They run units, would have been best people to consult	Not my opinion that it is necessary to consult them
And trans – so decision based on 0 evidence	There was no trans info in app to assess. So I used reasonable comments that he made on planning app at same time, which was temp COU to TH.
Seems v strange you just work on your own on a big application like this	Couldn't say. I wasn't aware, its always a chance, but didn't have any forewarning
Knew RF was likely to be appealed	
Who came up with the RFR	I did, and then agreed by manager.
Doc B2 – Why relying on GPDO?	Ref is standard wording used when assessing LDC app. First step is – is there anywhere in GPDO that allows this – says not dev If not, then ask if MCU
But this app has nothing to do with GPDO	Disagree – it's the first check in any LDC app.
It has nothing to do with the GPDO.	No, and decision doesn't rely on it either.
Did we ever suggest a reliance on it?	It relies on is it PD, no, then is it MCU – I say it is.
Shows a misunderstanding of legislation	Those are the app docs?

Re background docs – do you agree it incorporates these	
Incl app letter	Yes, but as set out in report – suggests quite a broad range of use.
When decided that you would lead the appeal?	When we received it
Not somebody more senior	No, I was the CO. That's normal.
Who wrote your PoE	Me – it's mine
On your own	Reviewed by colleagues
So not written on your own	No its my proof – advisors cannot write proofs for us.
Lunch 12.45-13.30	
History of Alton Estate	Searched online planning archives for MC. Also colleague went to London Archive that are in my SoC Appendix
Have you sought evidence, reviewed archive, or just relied on our evidence re history of Alton Estate	Also went to archives in Kew, but found nothing there.
What colleague – you said you worked on your own	I said I wrote the documents
So who was working on this application	I worked on it, for the appeal, I called on assistance from colleague – Davey Norburg – was an apprentice and took a day out to go there – took photos in appendix 1 SoC; and then as part of background, worked Jony Vameras and appeal team.
What docs are there from Alton Estate	I only looked at MC
Not checked planning archive for Alton Estate	no
Mr S has checked, and said it was deemed consent. 3p said the same	I didn't check
You should know alton estate inside out – one of only 3 sites you deal with	I know it as part of the apps I've dealt with. I've looked at history in context of GII* listings. Touches on history; and also the park/garden. But not looked specifically at planning process and how came to being
Know when built	Believe 1950s
Once biggest council estate in Europe big part of your team, but you don't know how it got planning	Not had to look at this
You say LCC built it	Yes, I think they did
You think LCC owned the land and built the estate	I think it is generally accepted it is an LCC project
LCC were a local authority at the time	Yes – and Wands within it.
Nobody can find a pp – accept built on deemed consent	No – jumps to conclusions – I've not looked into the history of the permissions. I've not had to.
Re MC – has the MC site got planning – from 1950/60	It would be fair to assume not built w/o pp. That would be v unusual to develop a college without a PP in place; that doesn't change just because I haven't seen the DN

How would it have got PP	Could well have been under deemed consent
OR – top p 16 – what conjecture mean in first para	That they were not directly related to planning – it was more about funding; I don't think you can equate them with there being no conditions – that is what this section of report is about. Docs do not show that there would be no conditions.
You are ref. to non-planning docs	Yes, because that is what A referred to in making their submissions
So at 1960 LCC owned MC	I've not seen any evidence. It's talked about as an LCC scheme – not seen any ownership records
Been through evidence and 3P docs about history of Whiteland's college	No
Sign diff in paper trail for Whitelands (hostel app) v Mt Clare – one owned Church, one by Gov dep	Don't know about ownership history
In your evidence you say MC CPO by LCC.	If I said that, I must have understood it from somewhere. Proof 5.5 Without doc, I can't draw a conclusion. This is A submission.
C10 – p27 – refers to capital and running costs – split between housing and education – correct?	Seems to
Also DH/MC separate	Talks about the scheme, then different buildings
Shows 2 sites; 2 figures	Disagree – talks about the scheme and different aspects.
So 6 (a) – buildings separately listed (b) DH separate to MC	Yes – it's split into the sites, but at the start of para 6 – it is the 'The Scheme' – one site can be separate parcels
For MC – what planning docs exist	There is recent history
No – back from the 50s/60s	Various reports, but don't seem to be any final documents
What planning docs exist	There is a TP cttee report – then other docs – useful background, but wouldn't call them planning docs
2 docs on the planning portal – one dwg 3020, another a planning cttee report	Yes
They are the only 2 docs	Available on the planning archives, yes – can't say whether there are docs available. But these are the only ones I'm aware of
In OR – you say little planning history available – do you agree there is a little bit – these 2 docs	Yes – but it is little
In SOC – it is little – but we have these 2 docs to base decision on	Don't think they are sufficient on their own – but they do provide some background info. One piece of puzzle
But nothing to contrary	No and they are consistent with the other docs from other cttees –

	See appendix 2a to SoC- erection of college and ancillary buildings – is consistent
Wands SoC 2.5 -- accept MC dev by LCC	No I say the records indicate this
Not accepting was?	No evidence to say conclusively was developed by LCC, but the records do indicate that
On Balance Prob – did LCC develop	Seems probable. They are on the historic docs as the instigator.
In SoCG27 – letter LCC to GC – F2108 – says when ready. Do you agree that GC are just an occupier	I don't know we can say that – We don't know who the governing college would have been. Talks about not all buildings completed on time – Talks of college premises as a whole; looks at the outstanding work; then looking at MC site – study beds and dining block; teaching at DH
So unless GC were occupier, why would LCC write in this way	Don't know
Sort of letter write to future tenant	Don't know what you would say to future ten. But it doesn't clarify anything for sure.
Balance of prob – reasonable assumption – letter from dev to potential occupier	It could – could also be to the body governing the funding of the new college
Doesn't mention funding at all On balance prob – is it a letter from dev to tenant,. Mentions term time	Says September 1962, then teaching block in Jan. But I don't want to guess who the governing body might be.
SoC 2.6 – Ref minutes of meeting – this is only one of 2 docs available. Do you accept this is only one of only 2 planning documents	I think I have 3 documents – Appendix 2b – further education sub-cttee report, headed TCPA, but goes to educ – difficult to say what is/isn't a planning doc – DN, or a stamped drawing – but decision from TP ctee on whether to raise an objection. I would call it planning – so its from a planning meeting
A decision?	It's a recommendation. More similar to a v short committee report A cttee report would be a planning doc
Go to C11 – 2b – is this a planning doc? We've amended dwgs so no need for any conditions	Can't conclude no conditions just because drawings revised.
No other conditions are ever raised – have you seen any conditions raised anywhere There was one condition – and the dwgs were re-drawn on the back of that – says we've addressed objection.	To draw that concl. Would have to assume that conditions would only come from Wandsworth. But it appears that Wands were consulted, raised comments.

Is it not reasonable to assume no conditions	To say no conditions at all – suggests LCC wouldn't want any conditions for other reasons. They might have. You are only looking at Wandsworth's interests – mostly about boundary/periphery
Suggesting LCC might have imposed conditions on themselves	I've said that there is nothing to say that there would be no conditions
Where would conditions have come from?	I'm not an expert in historic planning decisions, but now if you make a decision, they are on the consent
The local authority has spoken and they have no conditions	Doesn't mean LCC couldn't have included conditions. Need to look at different interests – Wandsworth looking at effect on wider estate. But LCC are providing a college, why wouldn't you want to impose conditions on that?
Far fetched that LCC would impose conditions on their own case. 2.11 – where is evidence that education/training centre – why has this been introduced? I've not seen any evidence that MC used as educ/training	I think GC is educ/training. In para 2.11 – in para 2.10 – first bullet point is descry for 1999 app (WD) describes MC as an education . So I was simply clarifying where that came from. Reason – to include the history of the site, but useful that 26 years ago – they were much closer then to knowing what the site was used for – i.e. training centre
As explored earlier- C can misname things; app was WD – little relevance	Think it is useful context
4.37 (SoC) – C considers more likely than not that was education based on docs. Where are we getting this?	I consider original use is training col. Also docus talk about needing to appropriate the land from ho to educ, which suggests it was in educ
What does appropriation mean	Re-zoning
No it means re-allocation of one asset from one gov dept to another [does it]	It could be – not looked at it in that detail. I've just seen it as change from housing to education – Mr G def but that gives more meat to argument that it was a college facility.
Soc 4.24/5 – is stance now that this is edc or Sui Gen?	Difficult to put current use classes onto 70 yr old consent, esp with limited info. But I'm looking at a training col that incl resi – that could be a residential college in C2, but that didn't exist back then; When I said Sui Gen – that is as student accom as per original applications – not modern classification of student accom

How can MC site be classified as education (at any time)	<p>It was originally part of a bigger site that was educ, with additional facilities.</p> <p>Had college buildings – DH and MC – with different uses on different parts of the site. Would be v much educ as 1 v closely interlinked scheme.</p>
How interlinked? Same tenant	No because describ. As college – happens to include spaces for people to stay. As part of col. Setup.
V clear col goes to one location; accom to dif location – dif zoning	Not sure about land use zoning being different
SoC 4.35 – mention worked on your own – disagree with KC opinion, Town Legal, Mr Sahota, Miss Cooley - .	By refusing, is clear there was a disagreement (didn't have town legal at the time) But nothing submitted with appeal docs to change that view.
You agree that dev was agreed in the 1960s	Seems to be
Agree owned LCC	Appears to
Developed by LCC	Indicated, but can't say for sure – more likely than not.
Under deemed consent	Most likely was consent, but can't say under what structure
No evidence of planning permission	Not seen one.
Go to SoC 3.1 – C agrees falls outside use classes, so Sui Gen – can agree it's not educational	If want to call SA educ use can be sui gen –
Agree not C3-	Principals house might have been – but all part of one planning unit with a mix of use – so sui gen use of the site.
Dwg 3020 – how many buildings shown on the plan	19 on the top one – ones underneath have garages
15 are student blocks	Yes
Pure hostel?	No can't separate as part of one college
What are those 15 buildings	Ancillary SA originally.
What annotated as	Hostel blocks/hostel units
Not reasonable to say 15 hostel blocks/units	No describ. On front – on title – says 'job – GC – shows it is all part of the college – plan sets out where the college uses are, doesn't say what PH is
What are the 15 units	<p>It says they are hostel units</p> <p>But I disagree pure hostel – they are buildings that are part of the college – linked to GC. Happened to be in use for students to live in.</p>
From 1960 – what use was MC -	Don't have any evidence – but docs indicate was intended to provide communal facilities/common rooms.
PH – how is that described?	Usually as staff/dining block.
Communal facilities on GF	Doesn't say that – just says staff/dining block

Do we agree that based on majority of buildings, its hostel accom	No I don't think the hostel descry is helpful in narrowing uses on the site.
In OR (2 nd para) – says MC descry as providing hostel blocks/staff/dining facilities	Yes as HoR
Does word 'use by' create a planning condition	Could have been a personal consent – but it is relevant to say it didn't say we are providing a college as speculative dev, it was spec for GC. We just don't know
Have you seen any evidence of a personal consent	Haven't seen any evidence either way – but clearly intended for GC
No evidence personal	No
OR – p 15– states if LDC to be granted – here you are ignoring all evidence – dw.3020 and planning minutes Not adopted balance of prob of evidence before you	I apply balance prob and come to different concl. That probate conditions attached and I haven't received enough info to say the contrary. Have considered KC opinion and available doc; and also not received info about how site operated. I was looking at evidence provided as a whole and concl that didn't have enough info to demon no conditions and that proposal not materially different.
Does planning info – 3020 and minutes not indicate deemed consent with no conditions	No indicate wands consulted on a scheme. Doesn't prove anything more or less than that.
SoC 3.12 – have you ever done a hostel application	Planning app was the first temp housing app I had done. This is the second
Do you understand how they operate	Think it is a very broad term. And broad uses
Miss Cooley explained how it would operate – but having visited, you can't understand how the GF as PH/MC can't operate as communal rooms and that this could be a hostel since 1960	Not a question about how site could have been used, its about not having enough info to draw conclusion that use are similar Info I do have seems to show there has been a change since 1963 – and since 2001 a new chapter in planning history is significant.
Don't see how all buildings intertwined and function collectively	Can see how all function as a planning unit, but not how all the buildings are all operating as one once did as part of college
How long CAB -enough to be lawful	6 years CAB not long enough to establish lawful use, but if changes unlawfully, can't change back without EN.
Think reasonable for hostel this size to have dining facilities	May be – depends how units laid out
Reasonable to have staff facilities	Yes
Could principal be regarded as member of staff	Don't think you need a principal
Would a principal be a member of staff	Of a college – yes

<p>5.43- PoE – reasonable to assume whole site performing as a hoste – what part is alien to a hostel</p>	<p>It descry the building occupied by college – talks about the college – that's the main purpose of the visit – to look at the college</p> <p>Talks about resi buildings and hostel units are a part of those. But, principals house would be part of the college.</p> <p>Also not a planning document.</p> <p>Talks about having students in the hostel units – ties students to the hostel</p>
<p>We accept students living in the hostel Are any of the buildings alien to a hostel Staff, dining, common rooms</p>	<p>Principals house is alien to non-student hostel – don't think it is part of a student hostel actually. And wouldn't belong to any other hostel use I can think of.</p>
<p>Just because called principal</p>	<p>Yes</p>
<p>Ref sites as 2 sites SoC 2.3 – DH – apart from sharing common tenant – what is relationship</p>	<p>I go into this in the proof – see it that MC was one dev site to provide a college. That is the link.</p>
<p>Have you ever come across a planning situation where 2 sites are deemed to be the same planning unit</p>	<p>I've dealt with sites where 2 red separate red lines separated by open space within Alton Estate – that was 1 application. In general, this is clearly a college spread across 2 sites.</p> <p>Presumably separate because was the available land deemed suitable.</p> <p>Its not unheard of.</p>
<p>In your eg – what is distance</p>	<p>Prob couple 100 m</p>
<p>But never come across a scheme where half mile apart</p>	<p>No – there might be bits with some separate things, and now usually a single red line with access roads</p> <p>But Battersea powerstation has separate pockets</p>
<p>C owns a lot of buildings – is starting point that all council buildings one planning unit</p>	<p>No</p>
<p>If LCC owned MC, DH, whole alton estate, why isn't everything one planning unit?</p>	<p>Don't think that is how PU would be defined.</p> <p>I can't speculate on PU for the whole Alton Estate</p>
<p>Your proof 5.12 – MC consistently ref separately to DH – because one is resi and one is educ – is that not correct</p>	<p>That's too simplistic</p> <p>Simple explanation is that it describes 2 islands and makes most sense to describe them based on the historic buildings on them. Could otherwise call them block A and B – the docs v clearly ref to a training college, college with HoR etc</p>
<p>C10 – p28 – Clear DH in contravention Zoning; MC in compliance – Clear sites have totally different uses?</p>	<p>I don't know what the zoning structure was like; but doesn't take away from it all being one scheme.</p>

Not clearly say in para 7- conclusive MC is compliant with zoning?	Could suggest that OK as would be using that piece of land for resi – but doesn't change that it was all linked as one college?
It says only one site in breach of zoning	Yes
F2. P79 Agree sites identified A and B as 2 separate sites?	Makes sense to talk about 2, but still talks about the college – don't know the size of college and, even separate parcels of land already being looked at as one scheme
2 sites described separately	Yes
F2 p 105 – At DH... proposed use – is describ as 2 sites	I know that at PoE 5.38 – I commented that this doc talks of HoR/principals Talks about MC and DH
F2 p 108 – 2 separate sites? Correct?	It describes them separately
SoCG 29 – F2 p 114. Section 3, para 2 – Mentions sign dist college and hostels – id 2 sites – agree?	2 blocks, but visiting GC.
[I think the point is that often ref. to as 2 sites, but ST thinks they are one college dev]	OK
PoE 5.21 – where is the educ use? Is there one at MC?	Would serve an education purpose, but also to do with describ of GC. Just because we haven't seen equip plan of DH, can't say these are not educ uses in this context.
Adjourn 3.00-3.15	
Planning conditions Does the class of occupier impose a condition – what role did GC have?	Docs suggest they occupied the site
So if I have a new apartment and I rent it to nurses/students does that make it nurses/student accom	Not a flat on its own
Doesn't change C3 to sui gen	If you are letting a C3 dwelling to someone else then profession would not come into it
On balance of prob in 1960, this was an unrestricted hostel	I clearly disagree and maintain it was a training col with HOR
C10, p5, para 3 – clearly not a resi college Says 400 plaes, accom for 240 – clearly not resi college	Actually says MoE haven't determined – but says unlikely to exceed. Doesn't give any real evidence for what the numbers were.
Doesn't read like it's a resi college?	Suggests some people wouldn't stay there, but not saying not HoR for a college
But not a resi college	Boarding school (eg) often have day students too It doesn't have to exclude people attending on a day basis to be a resi college
Proof 5.39 – you rely on non-planning docs when you want to	some we found in the archives, but often matched extracts already seen
All these docs supplied by us –	In each doc I've tried to say who provided it.

GC are not the applicant	We don't have any docs that say who the applicant/developer is -but clearly named as the user of the site.
You said LCC were the land owner and the developer – on balance prob	Yes
So aware what type of college GC was	Teacher training -
Needed to be over 25 – not term time - [all year round?]	Not so certain as that Talks FT students – but most degree courses are FT, FT undergrad tends to be sept to May, masters might be 12 months. Was ref to summer courses, suggesting dif. Lengths – but no detail of specific courses.
[17]	Way has been described is sept to may – then other students in summer – seems consistent with GC, ut it would still have same characteristics – courses starting at same time; clear starts and finishes, not ad hoc. Not that different, Not like 1 at a time.
F2 – p114 – para 5 -	Yes mainly 1 year FT – could be 12 months, could also be 1 year less than 12 months. Doesn't give that detail.
Elsewhere there is ref to this	Prev page talks about staffing ratio Not sure that would be poss if the students were some on 12 months – more likely to be able to have summer courses if sept to May, then summer But its not clear
Eg Fw 113 – burden heavy in summer when summer and FT courses in operation. (no question)	
Re HMO – we are perplexed – what is an HMO in this context in planning/planning definition.	Not the use class def, but a Sui Gen HMO is 7+ residents as a single household Relevant because if look at COU to TA – they would appear to share common facilities as 12 bed HMOs – as one household.
So, 15 HMOs here? Is that what we have	That is how considered. With PH layout – means not all Sui gen – but still licenced as such Student blocks, with 12 rooms – would be sui gen HMOs That is what it assembled the most.
Why has it gone Hostel to HMO	Because how described.

	<p>P12 OR – sets why considered it appears to be an HMO – due to accom in blocks, would be sui gen due to no resi's.</p> <p>Also described dif types of HMO, but now looking at it – looks more similar to standard HMO with 1 yr tenancies.</p> <p>That is different to a hostel – suggest more short term turn over.</p> <p>But being LDC – patterns.</p>
[AM I being asked to consider if HMO is lawful]	<p>Seems to be more C3 residential – stand alone dwellings;</p> <p>For temp housing, need to consider full range of terms that could be occupied on.</p>
[are you saying TA could be Hostel, HMO, C3]	Yes
[make a diff to my consideration?]	To be able to ascertain impact – if take out other uses – if changing from student accom to another form of resi – but here, we have other uses on site so clearly different and might not be necessary to find use like that.
What is a hostel?	A v broad term
Is what was built in 1960 a hostel	It was a training college with HoR
Are the physical buildings a hostel	No, they are part of a college that inc dif facilities
Just the buildings at MC	
What is a hostel	<p>V broad – all sorts of institutions – youth, nurses, student,</p> <p>In terms of homelessness – whether a hostel it is a matter of J</p>
What characteristics must it have Bedroosm?	Yes, but not clear if need to be private/shared/
Could they have en suite	Potentially
Kitchenette	<p>Depends which def. look at</p> <p>Ho act that Miss C relied on – incl that can't be separate self contained premises and need to provide facilities for food.</p> <p>If you have a unit with en suite and kitchenette – sounds like separate self contained premise</p>
What turns it to SC	You can meet all your needs – cook/wash within your resi unit
Where wash clothes, full dining facilities	<p>Laundry perhaps?</p> <p>I can't say size as a hostel. But in PI terms, need to have certain standards, and generally have enough space for relaxing/sleeping</p>

Historically had shared facilities – is that a hostel	PH seemed to have self contained flats; don't know what ref. was used for – eg dining hall, don't know if used by the students to avoid need of kitchen, or if staff only. Also seems no communal facilities in MC after a certain point. So during UoR, use by students seemed to be v much in each block.
Is statement that would need an HMO licence wrong?	At 6.20 – that summarise when licence is needed; that is not wrong. I also maintain that at 6.21 – info at time of writing, before Mr C evidence; this was accurate.
Mr C has never suggested self contained units	OK, on plan, they look self contained.
E2 – p 14 – FF PH share opinion most are hostel units?	They look like separate flats
One in corner has 4 rooms (on RHS) next doesn't have kitchen/has 2 bathrooms and 8 equal rooms. Next one over has maybe a kitchen, 2 bathrooms etc	Most have more than 1 bed. Have kitchens and bathrooms – would be a dwelling to me.
Mr Curtin p 15 – 2 commercial kitchens, bin room, laundry, common room, office, plant room. Are these communal facilities for the whole dev	Can't tell what units these serve from the plan; but regularly there are blocks of flats with shared facilities – bar/kitchen/dog grooming room. Doesn't mean that suddenly whole use of building is shared. Just that they have additional facilities to those provided in own dwellings.
Mr C has indicated a scheme where not S/C units – pages 17/18	Look like small self contained
But no evidence that anyone has ever put these forward as C3	No
So if self contained, would be BPC, and enforcement	Only if a material difference.
What is use class this appn?	Outside use classes
So nobody has suggested C3, not drawn C3	No its not been specified as such.
Miss C was clear it was exempt from HMO	Believe she said that
We are also clear, this is sui gen – we've not applied C1, C2, C3 etc	The app is for Temp Ho, but spec nature has been difficult to pin down. Not clear what can be ruled out
As DN had applicant's letter attached – clear hostel – you were clear that is what applied for. You are not clear now	I never said I was clear on the nature of the use at the time.
Earlier you said you were clear what was applied for	Not sure I did.
Re SV – said you saw no evidence of communal uses on site	In the blocks that not remodelled – there are communal kitchens and bathrooms
In PH – any communal facilities	No

Laundry room?	Saw an empty room, with sign, not sure when that ceased
Didn't see common room?	Yes – is common room when came in, but full of boxes – used as storage, don't know how long
Did it give you impression with hanging TVs (flat screen) that used as common room	Didn't pay much attention to the TVs, but seems to be used as storage now.
Does using vacant building for starge change planning classification	Could suggest it is storage used for another use could stop it being ancillary to SA, eg could be ancillary to general use by UoR
How long would that period of time need to be	10 years, to be lawful – but a COU can occur, even if not lawful. If change use, can't simply change it back and that be lawful.
Then mention some things used for storage, eg covid paraphernalia- when do you think they are there	Within last 5 years
When covid end?	Can't say whether there from start or end?
CAB use – not 10 years to establish use	If started 2019, its not long enough to be lawful.
Access UoG effectively owned until 1999 – your appendix C?	That was transfer to churches...
Uor started 2001	That seems to be agreed by everyone
No evidence of abandonment	Not sure how that would be evidenced in the docs
Went from one owner (effectively GC) to another unit – we say was hostel under GC, remained hostel under UoR – without 10 year gap in middle, would maintain its lawful use – believe commenced as a hostel	Disagree – started as a college; operated until seems 1987 by UoG history website – 1987-99 – know very little, other than it was transferred to churches – be then UoR started to refurb 2001. K
But no evidence that the buildings were unused/abandoned after UoG – that's an assumption	I've not assumed they were empty, but also can't assume if occupied or how.
If stands empty – change its planning classficiaiton?	Not necessarily. Can be empty
[I don't think abandonment has anything to do with this case. Move on]	
Can you live in a bare hostel?	Not sure what that is. I think a hostel without a description means very little. Eg a home can be a care home or a dwellinghouse. Need clarification.
Evidence consistently relies on superseded info from UoR, when they wrote march letter asking them to use their revised info. But in all your info, you ignore their latest evidence. You rely on 2024 letter – that's misleading	I don't think they ever say that the info provided in August letter was inaccurate. There is no reason for C/Inspector to pretend it doesn't exist.
Lets go to D2	They withdraw as R6 party, that is as far as it goes.
They withdrew objection wanted to support. They also wrote you an email	Yes they did, I didn't respond.

What did the email say. [not in evidence?]	No, may have been sent to PINS too Don't think letter D2 invalidates D1. – no objection, but no mistakes
[Now found – what did it say] Confirm opinion – and wish to revise position – copied to us. Point is that ST has only relied on previous one.	There was then a point.
[I said you could make submissions on that. do you want to ask about the new letter?] Later When was proof written	Can't remember deadline. Prob 22 April.
So 5 weeks after UoR Go to proof 5.57 say its not simply as hostel. What based on, because UoR say no difference	Tye are allowed a different opinion. I've drawn my opinion on the info presented, partly by UoR in first statement and partly by info submitted re office use; photos in appendix
If we go to street view images – one incl a sign – none of other years I think you are trying to est lawful use as an office	SV showed empty office building.
How?	Had layout of office – had sockets in floor like a floor – kitchenette; M/F toilets. Looked set up as office. Consistent with other evidence eg Mr Mills.
Sockets are in floor because grade 1 listed Toilets could have been common room. There is nothing that indicates that is an office	We have to disagree with that. Also note UoR D1 letter – said never common room facilities provided in MC.
Also gave a letter that superseded that chosen not to use Go to 6.1 – you've ignored UoR letter 6.32 – how can you say it is clear that lawful use does not comprise a bare hostel... etc. Ignoring everything written in 2025 letter. Lets go through it: 1. Site used year round 2. People econ deprived/minorities 3. GC operated non-standard term times; indiv's over 25	I've not seen the book ref'd at point 3
4. Managed single entity – on site, 0 tollerance 5. People integrated in community (mr Lewis said travel to campus is longer than lower; and satellite survgery on site) 6. Transport similar 7. Ceased in 2021, because surplus.	

8. Says no facilities So UoR letter totally diff to the table in your proof.	
[anything based on the letter – that leads you to change view on your column 2 , p 49]	Says about accom – I've said periods of vacancies. Here it says typically 39-51 weeks, might be other purposes in summer. But nothing in the table is contradicted. Social groups/ethnicity is not in the table at all. Doesn't change the table.
[Mr G – anything you would like to suggest conflicts with the table and what?] Length of stay	I lack potential difference in length of stay. But doesn't say anything about how common, but say max indiv period is 51 weeks; and students could return. But no info on how common that is
Common endeavour doesn't exist – not just accom for UoR – ref para 7 – last sentence	Says has been available, but again no info about that – if regular, or a particular collaboration where spaces made available. Nothing to go on.
Also point 2d -re PT work	Again, doesn't say what this is in the eyes of UoR – but spec says PT work, diff to FT work – and doesn't say majority – says sign proportion
Access to wider facilities UoR letter clear And 2 nd last para – but problem is letter was ignored.	Yes and table ack that too. – this reduces the burden on local facilities
[Is there anything in the letter about the way that UoR used MCH and PH?]	No – was just looking for detail MCH. Ref's to MC as the site, not the house. Or PH. But point 8 – uses in addition, but little info about this.
OR – found CLG doc – 32% jobs, but Mr S told by housing team that 60% would have jobs – yours is generalist info.	This wasn't general info -it was gov tables – national and council – based on figures for Wandsworth. Don't know what figures C colleagues gave to A. These are available on line
They would include classes of people that we've said are not suitable for this facility – eg disabled.	This is based on people in need. So assumes all of those. But as this is LDC the LDC wouldn't rule out these people being housed here. Can't filter out people based on suitability. This is most impartial evidence available
Why didn't you go to housing team and get proper info	I did ask the Ho team for info as part of this – said they had no info to give me.
You said you didn't consult anyone	Not as part of appn. They didn't have any info – it was just a quick question.

They didn't mention that they are speaking to me	No
Re Transport – agree Mr Lewis' info was well thought out.	Can't comment on that – not a transport expert. I will refer to Mr M evidence.
You composed his evidence with him	No, I'm not a transport planner. We had some discussions about what was most appropriate use to compare to to ensure some consistency.
Would you have given him the sheltered house use class?	Can't recall who suggested it. Because such broad appn – he was struggling to find comparisons.
PoE – 6.15 – appear to ignore Miss Cooley –[didn't have it] Do you disagree with her – that hostel is to be determined on fact/degree basis	Yes agree
She was clear it was a hostel; what type it was; shared; not self contained – had been inside, visited, analysed occupants, analysed previous use and came to conclusion that everyone came to – all found that this is a bare hostel	She also said she was not a planner, she would refer to the planning definition of a hostel, so her defn might be different to mine.
What is planning def. of hostel	It says – not a term of art and many different types of hostel. Need to look at specifics
So no planning definition of a hostel	Not a short/precise one.
6.33 – consider extg lawful use – cannot be bare hostel What is this based on – UoR/Miss Cooley don't think it's a COU.	I argue that can be MCU, because if character of uses is different then I conclude it is different.
What is different	Based on review of previous and original. And info available.
If MC was a site on its own, then UoR became tenant – how does that change the use.	It effectively severed the sites. And therefore was MCU from the permitted use.
If it was a site on its own, 2021 happened, how MCU?	I don't think it was on its own.
Hypothetically – assume it was. Was there MCU	Yes, at MCH – substantial part re floor space, being used as stand alone office building; and CAB – stand alone use – that is very different to if you have theoretical MC on its own 70 years ago
Back to 2001 – UoR moved in – how MCU – there was evidence in PH – Lets assume that was communal – reasonable?	There were signs but difficult to see what use was aside from storage. Don't know when any uses stopped. Would have been useful to ask UoR, but not enough to draw those conclusions.
Is there anything to suggest that there is MCU	Before, uses were ancillary; if was common room could have been ancillary to staff or student accom. But then, CAB is clear

	<p>change, as is change from MCH to provide stand alone office space.</p> <p>UoR said it never provided communal facilities.</p>
Hypothetically – UoR move in, is there a change of use	Depends on how they occupied it at the beginning. But they said never used MCH for communal facilities – so change of use of that building at least
Even though there is no evidence of that Of MCH not being used ancillary –	Photos are clear – facilities.
But going back to 2001 – any evidence then	No info, apart from ref to student blocks becoming available.
Go to pics. Photo from 2014 – (totem sign) Go to appendix B – what date	April 2018, July 2019
No totem sign	No. Can't say why sign didn't go wrong. Might have been issue with prominence re G1 LB, plenty of reasons why sign might have gone without changing use of the building
Could Mr C plans be implemented for SA as well as homeless?.	Disagree – it's not just layout, it's character of use.
But could be used by students – it doesn't rely on one or other	Under current uses – potential to remodel student blocks. – but that's not only factor.
Adjourn 16.55-17.10	
Proof 6.56 – despite having officers that could have advised – you used info over 10 years old - - Mr Sahota did contemporary review Do you accept your assessment was flawed?	<p>No – I used available info; incl. info from UoR – I think it is appropriate.</p> <p>When material impact, as in some needs met by those living in MC; that could be a material impact.</p> <p>That doesn't come into play – I consider it is materially different as to whether that is <u>acceptable</u> – so I haven't contacted GP surgery and don't think it was clear in Mr S evidence what capacity was available – don't know numbers – think Q was – is there capacity. That's not relevant for the certificate</p>
Your evidence 10 years old, Mr S was 2025	Re GP?
HIA is 2017	Don't disagree
Mr S gave extensive list of local facilities – agree this is extensive (Doc E3) Is this a substantial list	Seems to be, can't see if exhaustive, but given facilities available seems a good list
PoE 7.32 attempt to avoid costs? [that's the test – for me] But Ms T doesn't understand the balance of probs, has ignored info; lots of non-transparent behavior. Ignored UoR letter in evidence – despite letter saying use latest	<p>I didn't ignore the letter, but I chose to consider the first letter to be relevant.</p> <p>That didn't say info provided is untrue; just provided additional information.</p> <p>The email – (12 May) was after the proof.</p>

7.3 – you decided this app on your own, where are the experts? Where is the evidence? Not done any research – no evidence from experts on your side – you've just employed a barrister/lawyer	Will Marshall is the other Witness.
Has been eluded that LDC is a golden ticket to do whatever you want – is that your understanding	Its not a golden ticket – but it meansthat you grant the use listed on the descry. There is not scope to impose conditions – can't put weight on if acceptable. Just have to consider the range that could be considered with that use
So your prob is that there are no conditions	No – its just an incredibly broad use to consider.
How it is it broad? Can I operate a hotel	Like I said TA is broad
What use class sought	Says sui gen – but if hostel is fact/degree – need tonsider what else could exist if approved; might include intensification
Could I use it as C1, C2, C3, Supported housing or is that a breach of housing	Depends on the nature of the use – to be assessed Cas by Case – if it says open hostel – that would be materially dif to Temp Ho, potentially.
That's not we've applied for – this is a sui gen hostel – hostel everywhere – so I can't use it as C3; cant have micro flats sold separately	That would be materially different
You operated on your own Read all app form Covering letter Pulled out SA; ignored hostel, then Rf after 131 days	No, I didn't ignore TA – the descry on DN is Temp Housing (but TH/TA interchangeable – but yes I did assess/determine without direction of how to decide.
Our opinion is different. Treated dreadfully; and cost a fortune.	

IQ

[7]	No, don't think so. I was surprised to see that in such a poor condition.
[can we discount that]	If accept no MCU, that could still be a principals residence - .
33	It can do; whether significant or not – there is an area where hard to tell – it can indicate MCU
Is it the test	Test is about change in character; that could include patterns and behaviours. Behaviours could also lead to different travel patterns and off-site impacts
43	Suggests a long term plan to leave MC vacant. But can't take the use away.

	<p>Would need to apply to PH too. As MCU of that to TA given what it is at the moment</p> <p>If limited to the SA blocks, then would need to look at different characteristics I have described.</p>
47	<p>Anything that would remove SA would consider LP 28 – because loss of accom – There is an ID need for affordable and thousands of people on list – but LP29 focusses on putting those facilities on the right place.</p> <p>But this identifies that different needs for different types of accom under a broad resi category.</p>
49	<p>For a mixed use resi dev – pol RO2 – says mixed use dev with resi uses.</p> <p>Focusses on</p> <p>Any proposals must provide scheme for the temple – but doesn't guide uses. must include residential</p>
C3 or unspecified?	Does not specify that. Not sure if defined in policy definitions, but it's not in the allocation itself.

RX

Were asked about policy – please turn to C13 – pp ref for failure to meet LP28/29 – can see that proposal was CoU Student to TH – was that decision appealed?	No
Re scheme under site allocation – would you expect that to be just for COU, or inc operational dev	Would expect op dev; but it doesn't necessarily have to. Mixed use resi of some sort
If MC house was a null use – can you look at accom blocks – and look at characteristics	Yes
Does para 6.45 remain your view	
Was that the view of the appellant when it made planning app	Yes, otherwise don't think would have applied
Did Mr C say this too	I think so
IN EiC – and XX – Mr Curtin's scheme – Is one way to skin a cat – you said wouldn't expect LDC to inc details of reconfig.	Yes
You accepted that if lawful use remained, could be an internal reconfig	Yes
In lawful use, is it likely that they would be reconfig for double occupancy?	No – I don't think so
By families?	Unlikely - uni website says they don't cater for couples – assumes not families
Likely reconfig to allow self contained units	Unlikely That's not generally what SA is

Can you remember how beds currently on site	I think 208 (6.7 ST proof, cites A SoC)
Proposal is 257 – think that is w/o principals house Taking current lawful use, is it likely that buildings in resi use could provide 257 use	Yes, I think so
Just the 15 student blocks; and top floor PH – could you reconfigure that to provide them	If blocks A-E 12 to 15 rooms; then PH 28/32 – it could get you to 257
To do that, remove communal kitchens/bathrooms	Yes
You were asked whether MC site had pp and how got it – said could have been deemed consent. If it were, is it your opinion would have been a decision doc	Yes, I think there would have been some sort of final approval – what it would look like and any conditions
See F2 – p80 – resolution ... in your PoE 5.23 – you say the doc broadly indicates that app to be made to Minister; could also have been deemed permission. Which is more likely?	This is very clear what would happen next – i.e make an app to the ministry.
On the deemed permission – A says that was due to funding decision by Minister of Ed – have you seen a funding decision?	No, I've seen report that talk about funding, but not a decision.
5.43 – PoE- visitation report Were taken to certain parts – Go to part you've quoted – re historic house. Is it poss to say that MCH simply common rooms for students, or more broadly for anyone attending the college	No – social centre suggests something bigger- if there are day students, maybe they would use it – akin to a student's union but no detail.
Planning unit – 6.25 – some Qs about LCC being owner MC, DH, Alt Est – why not whole thing a planning unit. Go to Burdle tests – re purpose of the single main <i>occupier</i> – may be apt to consider unit with a variety of uses Who was occupier DH/MC	GC
See C10 – p28 – was put that demo one site resi/one educ.	I think as here – SA is clearly educational
Can a resi use also be an educ use	
Bottom of page – recom – s/t nec approvals – what do you say about 1 site resi/1 site training or not	I think it says all one college
Back to F2, Qs about whether GC term time etc. See page 113 – para re staff and summer term burden – ref to terms – suggest year round; or ac term times/ or not?	Suggests that there were terms – then talks about 1 year courses, and in summer. Does suggest terms.
You said that most likely use is UoR occupying site in Mixed use. Can go back to Burdle if nec, but does each use have to be in same use/fluctuate	Understand it can fluctuate within the site.

There will be legal submissions about whether can change use and change back. Let's say it was 10 years that each use had to be there – and then principle use could be resumed	A
Who is burden of proof on	
Have you seen any evidence from A that either PH/MCH has been ancillary to SA	No
Re office use – everyone agrees currently on site, and been then since 2019 (title says) Mr Mills reports office use 2009 Your 2014 photo. We haven't gone to C3 – town legal – para 1.2- impression of A solicitors at that time was what	Office
[do you know what TL would have based that on?]	No
We have asked for instructions provided In terms of CAB – 2019 2025 Office use 2009 (Mr Mills) Your photo 2014 Town Legal Your observations/mr Curtin suggested last use office Has A demo that an office use has not been persistent for 10 years.	No
Similarly PH – observed a storage use – you mentioned some covid paraphernalia; was everything related to covid?	No some things that might have been stored as part of the refurb – and then old files too.
Can we say how long the storage use has persisted at the site	No
Has A shown that use hasn't persisted for 10 years	No
Workshop – say how long	No, but when we went in – was described as metal workshop – but seemed to be wood workshop/timber Smelled like it was used/recently used – coming from family of wood workers.
Has A presented evidence not been in use for 10 years	No
Siad you ignored UoR second letter Please go to 6.31 PoE – you ack WD of objection and letter – C response - see docs in C14 – table at 3.2 is that right	Yes
Discharged	

The UU

S106 did not exist at the time the LDC application was made and so makes no difference to the question you have to answer, which is - if instigated or begin at the time the LDC application was made, would it have been lawful . what happens after the date the LDC application was made is of no relevance to your decision

How any bearing

We say it allays manufactured conclusion that it is not a hostel. Could be C1, C2, Hotel, sheltered housing – this makes it clear we are using it as TA. As a hostel.

Don't think it adds anything, but does give a doc that can be attached to the consent. But A1 can also be attached – just like it was attached to the DN. But no clearer than A1/application form.

Have taken instructions – don't think it should be accepted. It would add wasted costs addressing me on the relevance.

Even if Amends made and it became legally enforceable.

Overnight it would prevent the CAB use; workshop; storage. Difficult to see how I can have regard to it. If that's right, then it has planning consequences, that would be immaterial to this decision, but danger that it is seen as endorsing amendment to what is going on on site.

Difficult territory.

It will just lead to wasted costs.

Rejected

Requests for Closing

You will, no doubt, be addressing me on what might have been permitted for GC. In doing so, it might be helpful to explain what you think a definition of a hostel might be – and where you are getting that definition from. Please consider whether there is actually such a thing as a bare hostel (whether or not one exists here).

You will also, no doubt be telling me about how that has or hasn't changed over the years to paint a picture of what the existing lawful use of the site is, and whether that should be based on the original permission – deemed or otherwise – or what has happened since.

There is very little information about what happened between GC and UoR occupation, but on what we know is there more likely than not to have been any deviation from the GC use? I don't think there is anything to suggest that either the use did not simply continue, or there was simply no use at this time though – but as I said earlier – that latter scenario would not come anywhere near equating to abandonment – that's a red-herring.

We know more about UoR. I am particularly interested in your submissions on what the UoR have been doing at the site and whether that has resulted in a MCU of the planning unit. (I think Mr Sahota and Ms Thafvelin are agreed that the whole of the red line site is a single PU).

So the question must follow from that as to whether it is in a single primary use with some incidental uses, or whether it is in a mixed use. What is that use/what are those uses?

If it has moved away from a single use, was that change material? If it was, can it lawfully go back to a single use?

And then, the final question will be whether what is proposed, TA – is materially different to what has gone before. The description applied for is that, TA – agreed on day 1. But can the application forms and covering letter legitimately add colour to the use?

Conclusion

Closing to be given in writing:

C closings – by 09.00 on Tues 1 July. CC to appellant.

A closing – 12.00 Tuesday 1 July CC Council.

Costs – both sides.

Costs alongside closings –

5 days to review and respond – by 8th – 5pm

Fcs – by 10th

Allows MT to be met for the appeal.

Appendix E

Proof of Evidence – Siri Thafvelin – 22 April 2025



LONDON BOROUGH OF WANDSWORTH

Town and Country Planning Act 1990 (as amended)

Planning and Compulsory Purchase Act 2004

**The Town and Country Planning (Inquiries Procedure)
(England) Rules 2000 (as amended)**

PROOF OF EVIDENCE
Ms Siri Thafvelin, BA MA AssocRTPI
on behalf of London Borough of Wandsworth

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

Planning Inspectorate reference: APP/H5960/X/25/3358768

LPA Reference: 2024/2089

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i. Note on Cross Referencing of Appeal Submissions

To assist with review of this Proof of Evidence and cross-references to key submissions in the Appeal, we set the cross referencing convention below, including a list of the relevant documents.

Document Descriptor	Appeal Document
AD/1	Appeal Form
AD/2	Appellant's Original Statement of Case – January 2025
AD/3	Appellant's Revised Statement of Case – 28 February 2025
AD/4	LBW's Statement of Case – 28 February 2025
AD/5	Letter of withdrawal from University of Roehampton – 13 March 2025
AD/6	LBW's Response to Appellant's Revised Statement of Case and Letter from University of Roehampton – 21 March 2025
AD/7	Appellant's response to LBW's Statement of Case – 24 March 2025
AD/8	Statement of Common Ground
AD/9	Transport Statement of Common Ground
AD/10	Proof of Evidence of Will Marshall

Please note, in relation to the original application documents and historic documents at Appendix 1 to the Statement of Common Ground, this Proof of Evidence follows the agreed cross referencing convention, i.e. index item 1 of Appendix 1 is referenced as “**SOCG/1**” and index item 2 is “**SoCG/2**”, etc.

ii. Appendices

Appendix	Document
A	London Parks and Gardens website photo dated 2014
B	Google Streetview photos dated 2018 and 2019
C	Title documents
D	Planning history record in chronological order
E	Centre for Homelessness Impact “What is a Hostel in 21st Century Britain?” dated October 2024
F	Alton Estate Health Impact Assessment (HIA)
G	“Masterplan” dated April 2013 submitted with planning application ref. 2013/1857

1. QUALIFICATIONS AND EXPERIENCE

- 1.1. I am Siri Thafvelin, a Principal Planning Officer in the Strategic Development team within the local planning authority at the London Borough of Wandsworth.
- 1.2. I hold a BA Cities – Environment, Design and Development and MA Conservation and Regeneration and I am an associate member of the Royal Town Planning Institute (RTPI).
- 1.3. I have over nine years town planning experience within the public sector, having been initially employed by Spelthorne Borough Council as a Planning Technician between June 2015 and November 2016 and Planning Officer between November 2016 and September 2019, as Senior Planning Officer at the London Borough of Wandsworth between September 2019 and February 2024, and I have been in my current role as Principal Planning Officer in the Strategic Development team at the London Borough of Wandsworth since February 2024.
- 1.4. Throughout my professional career I have processed and determined a range of planning applications including a number of high profile, major redevelopment schemes for residential, commercial, industrial and mixed use developments, and lawful development certificate applications.
- 1.5. I am familiar with the appeal site and the surrounding area and I have visited it several times throughout the pre-application and application process and in the course of preparing for this inquiry.
- 1.6. The evidence I have prepared is given in accordance with the 'Code of Professional Conduct' guidance produced by the RTPI. I confirm that the opinions expressed are my true professional opinions.

2. INTRODUCTION

- 2.1 This Proof of Evidence (PoE) has been prepared on behalf of the London Borough of Wandsworth ("the Council") relating to the planning appeal submitted pursuant to Section 195 of the Town and Country Planning Act 1990 for Mount Clare Campus, Minstead Gardens, Roehampton Gate, London, SW15 4EE ("the Site").
- 2.2 The application was refused under delegated powers on 22nd October 2024 (**Document SoCG/4**). The reason for refusal is outlined below:

'The proposal constitutes development under the Town and Country Planning Act 1990 and the local planning authority is not satisfied that, based on the documents and drawings submitted as part of the application, this proposal falls within any class of 'permitted development' specified within the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), and that the proposal constitutes a material change of use and requires planning permission.'

- 2.3 As set out under Section 6, this PoE will consider whether the reason for refusal was 'well founded'.
- 2.4 My evidence will focus on the reason for refusal and explain why I am of the view that the Appellant has not demonstrated, on the balance of probabilities, that its proposal does not result in a material change of use, for which planning permission is required.
- 2.5 My evidence should be read alongside the other Proof of Evidence that has been prepared on behalf of the Council by Mr Will Marshall, Principal Transport Planner.

- 2.6 My evidence should also be read in conjunction with the agreed Statement of Common Ground (**Document AD/8**) submitted in respect of the appeal and the Council's Statement of Case (**Document AD/4**).
- 2.7 At the outset, I acknowledge that the issues in this appeal are mixtures of fact and law. Therefore, I have endeavoured in this proof of evidence to address matters of fact. Legal submissions will be made by the Council's advocate at the inquiry.

3. THE APPEAL SITE AND SURROUNDINGS

3.1. The site comprises Mount Clare campus, which is situated towards the southwestern part of the Alton West Estate, close to the boundary with Richmond Park. The Site is in the Alton Conservation Area and contains two Listed Buildings: Mount Clare House (Grade I) and the Temple (Grade II*). Most of the site is also situated within the Landscaping to Alton West Estate Registered Park and Garden which was designated by Historic England in 2020 at Grade II.

3.2. Figure 1 shows the site outlined in red which has been lifted from drawing no. 23047-X1-100 rev. B (Existing Site location plan) submitted with the application subject to this appeal:



Figure 1 Site location

3.3. The site is occupied by the following buildings:

- **Mount Clare:** Grade I listed two-storey building constructed in 1770-72 as a country residence, originally set within an open landscape setting, designed by Capability Brown. My understanding is that the most recent use of Mount Clare House was as offices by the University of Roehampton.
- **Temple in the Grounds of Mount Clare:** Grade II* listed temple building with decorative features internally and externally, built 1762-1769, and currently on Historic England's 'At Risk' register. My understanding is that this is a folly building.
- **Picasso House/Hall:** A two-storey 1960s building originally built to provide a dining hall and facilities at ground floor and 28 bedrooms at first floor level. I understand the last known use of Picasso House was as offices and as residential units for visiting lecturers and others associated with the University of Roehampton. A branch of Citizens Advice Bureau seems to have been operating from Picasso House since 2019, however I have no evidence of how much of the building is being occupied in this manner.
- **Blocks A-E:** Fifteen 1960s student accommodation blocks, clustered into five groups of three. These are all two-storey buildings containing twelve student bedrooms, with one shared kitchen and two shared bathrooms in each. There are a total of 180 bedrooms. The buildings are named individually, in clusters A-E: Albers, Andre, Appell, Balla, Bellini, Blake, Calder, Catlin, Cornell, Dali, Degas, and Duffy, Eakins, Epstein and Etty. The last known use of these buildings is as student accommodation, as mentioned by the University of Roehampton in their 12 August 2024 letter (**Document SoCG/8**).
- **The Lodge:** A brick building adjacent to the Temple which was originally built to be used as a house for the principal of Garnett College as shown in Drawing number 3020 P6/1A (**Document SoCG/17**). No evidence has been provided of its current or last known use.

- **Garage:** A small building adjacent to the Lodge originally built as garages to the principal's house. I have no evidence of its current or last known use.

3.4. Blocks A-E are student accommodation buildings that were most recently used by the University of Roehampton, who I understand also have a lease for Picasso House and Mount Clare House until 31 July 2026, as mentioned by the University of Roehampton in their August 2024 letter.

3.5. My understanding is that Mount Clare House was last in use for administrative purposes by the University of Roehampton. A photo dated 2014 from the London Parks and Gardens website (**Appendix A**), last accessed: 22 April 2025) shows a totem placed to the front of Mount Clare House identifying its occupation by the University of Roehampton Department of Property and Facilities Management. This included the accommodation office, finance department, projects team, domestic services and grounds and waste management team. I have no evidence of when Mount Clare House started and ceased to be used for administrative purposes but note that when I visited the site on 20 November 2023 and 28 January 2025 the building appeared to be vacant.

3.6. Picasso House is understood to have been built as staff accommodation and a dining hall but that it has more recently been used to house visiting lecturers and other people associated with the University of Roehampton (**Document SoCG/8**). It appears from photos from Google Streetview dated 2018 and 2019 (**Appendix B**) and title number TGL314324 (**Appendix C**) that since 2019 part of the building has been occupied by a branch of the Citizens Advice Bureau, however, I have no further evidence on this occupation or the extent of it.

3.7. The surrounding area is predominantly residential comprising a mix of bungalows and tower blocks constructed by London County Council in the 1960s as part of the Alton West Estate. The staggered terraces of

bungalows to the east of the site at nos. 1-13 and nos.15-33 Minstead Gardens are Grade II listed. The site is allocated for redevelopment within the Wandsworth Local Plan.

4. THE APPEAL PROPOSAL

- 4.1. The certificate of lawfulness application (ref. 2024/2089), which is now subject to this appeal, was validated on 13 June 2024. The covering letter submitted with the application, dated 11 June 2024, refers to the application as seeking "*to confirm that a change from the existing use of the Site for accommodation, to temporary housing, would not require planning permission on the basis that such a change would not constitute a material change of use.*" The covering letter states that the application seeks to determine if the current use of site as 'hostel accommodation' (sui generis) to 'temporary housing' (sui generis) would be lawful on the date that the application was made.
- 4.2. Following various amendments (**Documents SoCG/2 and SoCG/3**), and prior to issue of the decision notice on 22 October 2024 (**Document SoCG/4**), the application description was changed to:

Certificate of lawfulness for use as temporary housing (Use Class sui generis).
- 4.3. It is noticeable that the description of development does not make reference to number of bedrooms, length of stay nor does it define the nature of the proposed 'temporary housing'. As set out below, the Council remains concerned about the description of the proposed development and whether this truly encapsulates the description of the use which is relied upon by the Appellant in its application and appeal documents.
- 4.4. The burden of proof under the consideration of a lawful development certificate application rests upon the Appellant.
- 4.5. For completeness, as part of the application subject to this appeal, I assessed the proposal as both temporary housing and as houses in multiple occupation (HMO) as presented in my delegated officer's report

(Document SoCG/5). In both cases, my assessment concluded that a lawful development certificate for a proposed use or development in the terms sought could not be granted, as the proposal amounts to a material change of use.

5. PLANNING HISTORY

- 5.1. Given the fact that what was historically consented in the 1960s is a main issue in dispute, I present evidence about the planning history in two sections:
 - a) The time period in and around 1960 and up to 1963, which is when the evidence shows that permission would have been granted for use by Garnett College;
 - b) Post 1963 until today.
- 5.2. The planning history, as it was understood by the Council at the time of the decision to refuse the certificate, is summarised in both Section 3 of the delegated officer's report (**Document SoCG/5**) and also within the Council's Statement of Case (**Document AD/4, Section 2, paras 2.4 – 2.11**).
- 5.3. I would like to bring to the Inspector's attention the delays regarding the information referenced by the Appellant, the last batch of information provided on 9 April 2025. There remain facts stated within the Appellant's case which have not been evidenced, for example, matters such as changes of site ownership and use. For ease, **Appendix D** presents a table with the information referenced by both parties in chronological order, and I present a summary of the most relevant points of the planning history taken from the historic document extracts which are now available to the Council in the following section.

Time period in and around 1960 and up to 1963

- 5.4. In this section I consider the historical documentation available, some of which has been provided by Appellant and others which has been provided by the Council. I will make reference to which party provided the information, for clarity and ease.

5.5. It appears Mount Clare was subject to a compulsory purchase on 10 February 1948 (referred to by the Appellant in **Document SoCG/6**) however the Appellant has not provided a copy of this document.

5.6. **Document SoCG/9** provided by the Appellant shows correspondence dated 7 January 1955 between London County Council (LCC) and the Ministry of Works regarding Mount Clare, it mentions that the future of the site was "*not settled but they [LCC] hoped to let it and its grounds for private use*".

5.7. **Document SoCG/10** provided by the Appellant is dated 11 October 1957 and is a joint report by the LCC Architect, Valuer, and Education officer referring to Mount Clare as being a suitable location for a new college. Point 8 of this document indicates that the consent of the Ministry of Housing and Local Government would be required to release the undertaking to preserve Mount Clare as a scheduled building. Due to the closeness of Mount Clare to Richmond Park, consent from the Ministry of Works was also advised as being required.

5.8. The Appellant refers to a document dated 16 October 1957 which has not been provided by the Appellant. However, **Document SoCG/14** makes reference to this date, indicating that the Education (Higher Education) Sub-Committee approved on that date, the relocation of Garnett College "*to this site, retaining Mount Clare as restored and erecting a new block within the grounds. The Ministry of Education have lately expressed the view that this project does not offer sufficient scope for later extension of Garnett Training College and a suggestion has been made to use this site jointly with that of Downshire House, the executive portion of the whole being located on Mount Clare site*".

5.9. **Document SoCG/11** provided by the Appellant is dated 14 February 1958 and is a Hansard extract which refers to the proposed relocation of Garnett College to Mount Clare and Downshire House. However, I consider this

document has little relevance to the appeal and that it serves as contextual information only.

- 5.10. **Document SoCG/12** provided by the Appellant seems to be a memo from the Ministry of Work regarding LCC's Housing Sites 1 and 2. It is not clear what these 'Housing Sites' are. It states that LCC are: "*considering the placing of single and two storey hostel buildings in the ground of Mount Clare abutting the Park boundary*". It refers to the A.C.A "comments overleaf" however, I have no knowledge of what A.C.A stands for and the "comments overleaf" have not been provided by the Appellant. There appears to be no context provided for this memo and it is not accompanied by supporting papers.
- 5.11. **Document SoCG/13** provided by the Appellant is the formal response from the Ministry of Works to the LCC Architect dated 4 June 1958. It states: "*Proposed rebuilding of Garnett College at Mount Clare*". The response raised concerns about the proposed buildings being too close to the boundary with Richmond Park.
- 5.12. **Document SoCG/15** provided by the Appellant is dated 19 February 1959. It is a report from the LCC Architect to the Education (Further Education) Sub-Committee and the Town Planning (Architectural and Historic Buildings, etc) Sub-Committee indicating a proposal for "*the development of Mount Clare and Downshire House for training college and hostel purposes to replace Garnett College*" was discussed with the relevant offices and Ministries and that, at that stage, firmer plans could be drawn. The report reads:

"Plan A - Downshire House proposed for training college development and at present in the possession of the Housing Committee".

"Plan B - Mount Clare also in the possession of the Housing Committee now proposed for the provision of hostel accommodation for training college students"

“Proposals are not likely to exceed 400 places in the college and accommodation for 240 students in the halls of residence...”.

“It will now be necessary, subject to the concurrence of the Town Planning Committee, to submit a formal application to the Minister of Housing and Local Government”.

5.13. Both **Documents SoCG/14 and SoCG/15** clearly identify Downshire House and Mount Clare as being progressed in conjunction to provide the required areas to relocate Garnett College. It is also worth noting that the proposal mentions *“hostel accommodation for training college students”* and *“accommodation for 240 students in the halls of residence”*.

5.14. It is also worth noting that the document clearly indicates that a formal application was to be submitted to the Minister of Housing and Local Government.

5.15. **Appendix 1A of Document AD/4** is dated 25 February 1959. It is an agenda paper for London County Council (Further Education) Sub-Committee. It reads:

“Mount Clare and Downshire House – Proposed Use. Asking the Committee to inform them in January 1959 of the position as regards the proposed use for further education purposes of Mount Clare and Downshire House, Wandsworth”

5.16. The above document is consistent with previous evidence, which treats Downshire House and Mount Clare as a single development, for *“further education purposes”*.

5.17. **Appendix 1D of Document AD/4** is dated 3 March 1959 and is an agenda paper for the LCC Planning (Architectural and Historic Buildings) Sub-

Committee meeting on 3 March 1959 asking the Sub-Committee to concur in the decision of the Education (Further Education) Sub-Committee of 25 February 1959 to approve the proposals.

- 5.18. **Document SoCG/16** provided by the Appellant is a report dated 9 March 1959 from LLC to the Town Planning (Architectural and Historic Buildings) Sub-Committee. The Sub-Committee approved in principle the proposals "*for the development of Downshire House and Mount Clare, Wandsworth, as indicated in the drawings G.3020. P4/1 and P4/2 for training college and students' hostel purposes to replace the existing Garnett Training College*".
- 5.19. **Document SoCG/17** provided by the Appellant contains a plan for Garnett College, Mount Clare titled 'Site Plan' ref. 3020 P5/1A. The Appellant mentions this plan is dated 29 September 1959 although this is not clear from the document. The plan shows the Mount Clare site outlined in a dashed line which includes, from east to west: The Temple, The Principal's House, Garages, Hostel units, Staff and dining area, Mount Clare House and Hostel units.
- 5.20. It is unclear whether the Appellant has available a plan of the Downshire House element of the proposals for Garnett College. However, given the proposals appeared to be 'one' it is likely that there would have been at least a further plan.
- 5.21. **Document SoCG/17** provided by the Appellant shows the Mount Clare site as comprising a number of buildings, all with different but related purposes and there does not appear to be any physical measures to separate the buildings. I am of the view that, when looking at this plan as a whole, this does not support the view that the site was proposed as a bare hostel use (i.e. unrelated to the educational use), as the plan refers to the occupation of the overall site by Garnett College, contains buildings that all serve an educational purpose, and would be considered either a single unit on its

own, or, as part of a single unit together with the Downshire House Site (see discussion below).

5.22. **Document SoCG/18** provided by the Appellant is dated 30 September 1959 and is a report from LCC Education (Further Education) Sub-Committee. The report mentions:

“6. If the Sub-Committee accept the proposals, they will wish to seek the concurrence of the Housing Committee in approving in principle the appropriation of Downshire House and Mount Clare from housing to education purposes. A report will be submitted on the transfer values of the properties in due course.

RECOMMENDING -

- (a) *That the development of Downshire House and Mount Clare as indicated on the drawings G.3020.P4/1 and P4/2 for training college and students' hostel purposes to replace the existing Garnett Training College be approved in principle.*
- (b) *That, subject to the approval of the Town Planning Committee, an application be made to the Ministry of Housing and Local Government for his consent to the development of Downshire House and Mount Clare on the lines of the outline scheme submitted.*
- (c) *That the officer be instructed to report further on alternative arrangements for the provision of community centre and health centre facilities in the area.*
- (d) *That, subject to the concurrence of the Finance and Housing Committees, the appropriation of Downshire House and Mount Clare from housing to education purposes be approved in principle and that the Valuer be instructed to report on the transfer value involved in the appropriation.*
- (e) *That the Health and Housing Committees be informed in the relevant terms in the foregoing report.”*

5.23. The above document explicitly states that an “*appropriation of Downshire House and Mount Clare from housing to education purposes*” was required. It further adds that the proposal was for a “*training college and students’ hostel purposes to replace the existing Garnett Training College*”. In my view, this is consistent with the rest of the evidence presented so far and is contrary to the Appellant’s assertion that any planning permission would have been for a bare hostel use. Further, the document clearly indicates that a planning application was to be made to the Ministry of Housing and Local Government.

5.24. The Appellant then makes reference to a document dated 20 October 1959 in which the appropriation from Housing to Education was approved, however the Council has not received or seen this document.

5.25. On 24 March 1960 a letter from the Ministry of Works (**Document SoCG/19** provided by the Appellant) mentions: “*We are now asked to consider the effect of the L.C.C proposals for Garnett College (as linked with Mount Clare) will have on the amenities of Richmond Park.*

“Mount Clare as you know is on the boundary of Richmond Park and it is proposed that hostel units on two floors and having a height of 18’ or thereabouts will be erected within its grounds; also a staff and Dining block of a little over 20’ high and a Principal’s residence. These proposals are shown on drawings No. P.5/1/2/3/9/10/11 accompanying these papers...”

5.26. The letter then raises concerns regarding the closeness of the proposed buildings to Richmond Park and the implications to the park. No copies of the accompanying papers mentioned in the letter have been provided by the Appellant. I note that the letter refers to “*Garnett College (as linked with Mount Clare)*”. There is reference to “*hostel units*” in the letter and this is mentioned in the context of the rest of the buildings proposed on site (“*...also a staff and Dining block of a little over 20’ high and a Principal’s residence*”).

5.27. **Document SoCG/20** provided by the Appellant is dated 28 March 1960 and is a memo from the Ministry of Works to LLC indicating that the Ministry was not able to grant “any special privileges to the L.C.C” and that they were “unable to agree to their proposals as they were present”. As such, the Ministry recommended amended proposals were prepared and submitted for further consideration. Again, this appears to support the view that a positive planning application would have been made for the development.

5.28. **Appendices 1F - 1H Document AD/4** are an agenda paper from LCC (Further Education) Sub-Committee dated 4 May 1960. Item 4 refers to Garnett College and it reads:

"Architect and education officer and concurrent report by the comptroller of the Council - As to the development of Mount Clare and Downshire House for the provision of teaching and hostel accommodation for Garnett College"

5. In addition to the adaptation of the existing properties the scheme provides for the following accommodation:

Mount Clare – Connected visually to the house itself by a sunken court, it is proposed to erect a two-storey building containing kitchen and dining room on the ground floor and resident staff accommodation above. Grouped on either side of the house, sited so as to preserve the many beautiful trees which exist and to allow an uninterrupted view from the house over Richmond Park will be two informal wings containing six and nine two-storey study-bedroom units respectively all arranged in groups of three. These will be constructed of brick painted to harmonise with the painted stucco of the house.

The principal's house, placed at the southern tip of the site, will be positioned partly over the site of an existing pond, the preservation of which is also included in the Council's undertaking to the Minister.... The principal's house will be provided with a garage and there will also be three garages for staff use nearby.

Recommendation –

(a) That, subject to the necessary approvals, the scheme as shown on drawings Nos G/3157/P6/16, G/3020/P6/1-7, G/3324/P1-5 and G/3325/P1 and P2 for the development of the sites of Mount Clare and Downshire House, Wandsworth, for use by Garnett College as a training college and hall of residence be approved and, subject to the concurrence of the General Purposes Committee, the Architect be authorised to prepare working drawings..."

- 5.29. I note that the plans numbered in this document are G/3020/P6/1-7 whereas the main plan relied upon by the Appellant is a previous version (G/3020/P5/1A). **Appendix 9 of Document AD/2** (i.e. the Appellant's original Statement of Case) contains a copy of drawing G/3020/P6/1 showing the main difference being the location of the garages and the principal's residence further into the site.
- 5.30. **Document SoCG/21** provided by the Appellant is dated 13 May 1960 is a memo for the Town Planning (Architectural and Historical Building Etc) Sub Committee. It refers to the approval on 4 May 1960 of the proposals by the Education (Further Education) Sub Committee. The recommendation is the same as that quoted at **Appendices 1F - 1H of Document AD/4**.
- 5.31. **Document SoCG/22** provided by the Appellant is a copy of Document 21 however it is dated 16 May 1960.

5.32. **Document SoCG/23** provided by the Appellant, is a meeting paper from the Governors of Garnett College. Item 5 related to Mount Clare and Downshire House and indicates the Ministry of Education approved the block plans and schedule of accommodation with the view of preparing working plans.

5.33. **Document SoCG/24** provided by the Appellant is an 'Extract from Town Planning Committee – 8th July 1960' and refers to Mount Clare House and Downshire House. The development reads: "*Erection of a college and ancillary buildings*".

5.34. Within this record, it states that the borough council's observations (namely, the observations from Wandsworth Borough Council to London County Council) have been requested for the erection of a college and ancillary buildings. The document describes the scheme as including a two-storey staff and dining block on the eastern side of Mount Clare House and fifteen two-storey hostel buildings in the rear grounds to the eastern and western sides. Mount Clare House was to be converted to provide students' common rooms. A principal's residence and two garages were also proposed to the south-eastern corner of the site, near the Temple.

5.35. **Document SoCG/25** dated 5 October 1960 provided by the Appellant shows that the town planning committee was recommended to raise no objection to the proposal, provided that an existing 2ft 'safety strip' along the eastern boundary of Mount Clare was widened to provide a 6ft footpath and that any new footway crossings were constructed to the satisfaction of the borough council.

5.36. **Documents SoCG/24 and SoCG/25** are consistent with all evidence available.

5.37. **Document SoCG/26** provided by the Appellant includes an extract from an Education Committee Report dated 11 October 1960 which states that:

"Redevelopment of the site at these premises for use as a training college with halls of residence for students, to house Garnett College (Southwark)

... With the agreement from the Town Planning Committee we have approved a scheme for the provision of halls of residence and a house for the principal of Garnett College on the site of Mount Clare and for the original residence to be adapted for use as students' common-rooms...

The new buildings for the college on this site will comprise a two-storey building, containing a kitchen and dining-rooms on the ground floor, with accommodation for resident staff above, sited close to the existing house with access to it across a sunken court and fifteen two-storey halls of residence, each containing twelve study-bedrooms, sited in groups of three on either side of the house so as to preserve the many trees on the site... The principal's house will be sited at the southern tip of the grounds. It is necessary to preserve an ornamental temple and pond on this part of the site and the siting of the principal's house will involve the provision of a shallow pool to replace the pond."

- 5.38. **Document SoCG/26** provided by the Appellant appears to be the last record of discussions of the proposals for Downshire House and Mount Clare available at the time of writing my Proof of Evidence and, as summarised above, contains detailed descriptions of the scheme. From this, I note clear references to "*halls of residence*", "*principal's house*" and "*students' common rooms*". There is no reference in Document 26 to "*hostel units*" which is contrary to the Appellant's position.
- 5.39. It appears to me that the terms "*hostel accommodation*" and "*halls of residence*" are used interchangeably in different reports but are always seen in the context of its primary use by Garnett College as a training college, which is contrary to the Appellants' position that the development was for a bare hostel use.

5.40. **Document SoCG/27** provided by the Appellant is dated 6 November 1961 and is a letter from LCC Education to the Garnett College Governing Body providing an update on the works. It mentions: "*3. Thus, while the study bedrooms, common rooms, etc., may well be ready by September 1962, the dining and staff accommodation clearly will not. On the other hand, the teaching block should now be ready for January 1963, so that, if occupation is deferred until that date, all the college buildings could be taken over at one time.*"

5.41. This document appears to evidence that work commenced on site at some point between October 1960 and November 1961 which likely indicates permission would have been achieved prior to this time. It is notable that there is no reference to hostel units being provided but instead the report refers to "*study bedrooms, common rooms...*" which again is contrary to the Appellant's position that the permitted development would have been for a bare hostel use.

5.42. **Document SoCG/28** provided by the Appellant is a Hansard extract which does not appear to contain any relevant information.

5.43. **Document SoCG/29** provided by the Appellant is dated 4 December 1963. It is a Visitation report by the University of London Institute of Education dated 4 December 1963". It reads:

"3. Buildings and Equipment

On previous occasions Visitors have been critical of the buildings occupied by the College. It is therefore a particular pleasure to record that on this visit they were greatly improved with the teaching and residential accommodation. Although the College has exchanged a central site in London for one on the western outskirts, this move is amply compensated for by the excellent buildings and gracious sitting in which the College now carries out its work...

The modern teaching block blend happily with the adjacent Downshire House, a historic building which has been successfully restored and adapted as an administrative centre for the College. The disadvantages arising from the siting of the residential buildings at some distance from the teaching and administrative blocks are offset by the excellence of the accommodation provided. Fifteen well-designed hostel units housing twelve students in each unit, dining rooms, kitchens, accommodation for resident wardens and domestic staff, as well as the Principal's house, are grouped around Mount Clare House. This historic house is of considerable architectural merit and has been restored, decorated and furnished to provide a social centre for the College of great elegance and charm..."

5.44. I am of the view that this document, which is not a planning document and appears to post-date any permission (deemed or otherwise), shows the links between Downshire House and Mount Clare, with Downshire House providing “teaching and administrative blocks” and Mount Clare accommodating “Fifteen well-designed hostel units housing twelve students in each unit, dining rooms, kitchens, accommodation for resident wardens and domestic staff, as well as the Principal's house”. Even taking a narrow view regarding the “hostel units” these are described as housing “twelve students in each unit” which is contrary to the Appellant's assertion that this site benefits from a lawful bare hostel use.

Post 1963 until today

5.45. It appears that Garnett College operated from Downshire House and Mount Clare from 1963 until its merger with the Thames Polytechnic (now University of Greenwich) in 1987¹.

5.46. A review of the title deed and title plan for the site (**Appendix C**) reveals that University of Greenwich owned Mount Clare until at least March 1999 when it was transferred to Green Acre Homes (South East) Limited and the Battersea Churches and Chelsea Housing Trust.

5.47. In June 2001, Mount Clare House was acquired by the Trustees for Methodist Church Purposes. The Trustees act as custodian of all property held on Model Trusts of the Methodist Church Act 1976. A review of the University of Roehampton digital records²state that: "*In 2001, the Trustees of Southlands College acquired the Mount Clare site on behalf of the University*". The same document identifies the links between Southlands College and the Methodist Church.

5.48. By at least 2001 the Downshire House and Mount Clare sites had split in their ownership and occupation. Thus, if the original permission was as a comprehensive planning unit, which the documents above indicate is the case, then the division of the ownership and use of the site is likely to have created a new planning unit.

5.49. If this is the case, it is therefore necessary to consider what the lawful use of the site would be, apart from the terms of any planning permission granted in the 1960s.

¹ 'History of the University'. University of Greenwich. Accessed 22 April 2025. <https://www.gre.ac.uk/about-us/history-of-the-university>

² 'Southlands History'. University of Roehampton. Accessed 22 April 2025. <https://www.roehampton.ac.uk/student-life/colleges/southlands-college/history/>

5.50. In my view it is clear that the Site has, since 2001 been in the following continuous uses by the UoR: student halls of residence, staff accommodation, offices and a separate dwellinghouse (possibly as a principal's residence).

5.51. The Council records indicate that in April 2002 application ref. 2001/4576 for Mount Clare campus was granted for the "*Demolition of existing student accommodation blocks, lodge and dining block. Erection of 15 two, three and four-storey student residential blocks comprising 282 student bedrooms. Erection of a two-storey academic administrative/social block adjacent to Mount Clare. Provision of associated landscaping and parking*". This permission was not implemented. An extract of the Committee report for this application is presented in Figure 2.

Within the grounds are 15, two-storey student accommodation blocks together with a two-storey lodge and a Grade II listed Temple in the south-eastern corner. The site contains numerous trees, particularly along the western boundary with the Richmond Park golf course (a Grade 1 Historic Park and MOL). Many of the trees are protected by a Tree Preservation Order. The site slopes steeply downwards from the main house down to the boundary with Richmond Park.

To the north and north-east are a number of eleven/twelve-storey tower blocks centred around Tunworth Crescent with Roehampton Gate Primary School further to the north. To the east and south-east are single-storey residential units fronting onto Minstead Gardens with the recently completed two-storey residential development of the former Danebury School site behind. Focus Hall (a two-storey community building) adjoins the south-east corner of the site beyond which there are flats and houses. Within the Alton Conservation Area.

The main house and grounds have been in use as student hostel accommodation (providing 180 units) together with ancillary educational use in the Mount Clare building itself since the 1960's. The University of Greenwich last occupied the site in 1998.

Southlands College (part of the University of Surrey – Roehampton) purchased the site in June last year and has recently refurbished the existing student residences, which are now fully occupied.

HISTORY: A number of permissions and listed building consents have been issued over the years in connection with the former educational uses.

5.52. In 2002 the assessment of this application was made on the basis that the use of the site included "*student hostel accommodation (providing 180 units) together with ancillary educational use*".

5.53. Other applications for the site relate to works to trees. The only relevant planning history for this appeal relates to the expired permission referred above (ref. 2001/4576).

5.54. An application for Downshire House (ref. 2013/1857) was approved in August 2013. Included as part of the approved documents, there is a Masterplan for student accommodation for the four colleges which form University of Roehampton: Froebel College, Digby Stuart College, Southlands College and Whitelands College (Appendix G). The document is dated 2013. It shows the following image:



5.55. Mount Clare can be seen at the bottom left, with Mount Clare House and Picasso House shown as “Academic & academic support space” and “residential space”.

5.56. As such, it appears the use and occupation of Mount Clare has remained consistently ‘academic’ even after 2001.

5.57. Based on the evidence above, I am of the view that, whether or not the lawful use derives from a permission granted in the 1960s or from the established use and occupation of the site by University of Roehampton for over 20 years, the evidence is substantial in that the use of the site is not simply as hostel.

5.58. On this basis, I consider that the Appellant has not demonstrated, on the balance of probabilities, that the permitted or otherwise lawful use of the site is as bare hostel use.

5.59. I note that the Appellant has provided **Documents SoCG/30** (Wandsworth letter dated 28/12/1989) and **Document SoCG/31** (FOI Correspondence).

5.60. **Document SoCG/30** is a letter from the Council to the Education Assets Board dated 28/12/1989. In this letter the Council requests that the Site, alongside Manresa House and Downshire House are included in the Education Assets Board's "*referral to the Secretary of State for Education and Science*". It states that Mount Clare was included in the Council's "*Education Development Plan*" to be used "*for attracting teaching staff to the Borough*" and that its use to this purpose is "*an essential element*" for the Council to comply with its statutory obligation to provide accommodation to teaching staff.

5.61. **Document SoCG/31** contains email correspondence regarding the Council's potential interest in bidding to acquire the site.

5.62. I do not consider that these documents have any bearing on the lawful use of the site as the indication that the site could be appropriate for a particular use does not mean that the use is the lawful use.

Decision notice and deemed permission

5.63. A decision notice for the above proposals for Mount Clare and Downshire House has not been provided by the Appellant and the Council has not been able to locate a decision notice for the site.

5.64. The Appellant is of the view that permission was deemed to have been granted under Section 35 of the Town and Country Planning Act 1947 and therefore this 'deemed permission' would not have had any conditions attached to control the use of the site. As noted above, the balance of the evidence appears instead to suggest that there would have been a positive grant of planning permission, and this will be addressed further in legal submissions to the Inquiry. Further, I note that the Appellant has not located or identified the funding decision which would have enabled a deemed permission (by separate decision) to be granted.

5.65. However, even if the permission were to have been 'deemed', my understanding is that there would still be a separate decision notice in relation to this. I am of the opinion that there is no basis for assuming that because the parties have not been able to locate a final decision notice, there are no conditions controlling the use of the site.

5.66. As evidenced in this section of my proof, even without considering the other uses on the site, every single historic document available to date makes clear that the purpose of the accommodation blocks at the point of the grant of planning permission was to provide living accommodation for students attending Garnett College as well as other facilities relating to the College and that the entire development was permitted as a single training college with student accommodation.

5.67. As such, in my view, any description of development is highly unlikely to solely have referred to a hostel use. Even if that was the description given to the accommodation blocks (which the balance of evidence does not support), and even if one were to take the appeal site on its own (without Downshire House) the site also included a dining block with staff

accommodation and a principal's house (i.e. the Lodge). Taken together it is likely, in my view, that the description of development would have made the educational nature and purpose of the proposal abundantly clear. It is likely that this use would have been secured through the description of the development and/or any planning conditions.

- 5.68. The Appellant has presented only one of the plans which are referred to in the reports subject to this planning history. This is drawing number 3020 P6/1A. I accept that the accommodation blocks are described on the plan as "*hostel units*" however it is necessary to have regard to the entirety of the plan. It can be seen that the title of the plan is: 'Garnett College Roehampton, Mount Clare House Site'. Further, the plan shows Mount Clare House with an annotation of "*Student Common Rooms*". There is also a "*Staff & Dining Block*" and a "*Principal's Residence*".
- 5.69. Finally, it is worth noting that the Appellant's case that there would have been a deemed permission rests on funding being granted by the Ministry of Education. The funding was for a college so in my opinion it is therefore, more likely than not that any permission, deemed or otherwise, would have been for an educational use for Garnett College, and not for a bare hostel use, to ensure that the funding by the Ministry of Education would be used for its intended purpose.
- 5.70. As evidenced, regardless of whether or not there is a deemed permission with or without conditions, it is for the Appellant to demonstrate, on the balance of probabilities, that the planning permission for the site was issued for an unrestricted 'hostel' use. However, the Appellant has not provided sufficient evidence to demonstrate that, the permitted use would have been a bare hostel use that was not specifically tied to an educational use (whether deemed or not).

6. CASE FOR THE COUNCIL

6.1. In this section of my evidence, I will explain why I am of the view that that the proposal would represent development requiring planning permission and would result in a material change of use of the site and therefore the reason to refuse to grant a lawful development certificate is well founded and correct.

6.2. A case management conference was conducted for this planning appeal on 10 March 2025. I agree that the Inspector has identified all of the main issues in this case. These are:

- a) Clarification of the use being sought and how that could be precisely described.
- b) Identification of the relevant planning unit(s).
- c) The existing lawful use of the planning unit(s) and whether that has been established through the (possibly deemed) grant of planning permission, or through the passage of time.
- d) If a use was given permission, whether that use has continued to remain or has subsequently changed.
- e) Whether the existing use can be described as a hostel, restricted or otherwise.
- f) The nature of the proposed use.
- g) Whether the proposed use can be described as a hostel, restricted or otherwise.
- h) Whether, even if existing and proposed uses can both be described as hostels, there could (theoretically) still be a material change of use.
- i) Whether the existing and proposed uses would be materially different, with particular regard to the nature of the use, effects on highway safety, parking, noise and disturbance, and local services.
- j) The relevance of policies that seek to protect student accommodation.

6.3. I address these below, some of which have been combined as they cover closely interlinked matters.

Matters related to the proposed use:

- a) Clarification of the use being sought and how that could be precisely described;*
- f) the nature of the proposed use and;*
- g) Whether the proposed use can be described as a hostel, restricted or otherwise.*

6.4. Regarding the nature of the proposed use (issue f), and as set out in Section 4 of this PoE, the description of the certificate subject to this appeal is for “*Use as temporary housing (Use Class sui generis)*.”

6.5. The terms of the lawful use are not proposed to be limited by the Appellant in any way. It is for the Appellant to clarify the use being sought; therefore, I have nothing to add regarding issue (a). However, I would like to draw the Inspector’s attention to the fact that, as a certificate is conclusive as to the lawfulness of the use of the site, the terms of any certificate, were it to be granted, should accurately match the use which the Appellant is claiming as lawful and should not be broader than that use.

6.6. The Appellant’s description of the use does not provide any definition of the number of bedrooms, length of stay, the nature of the proposed temporary accommodation or the characteristics of those who are proposed to be housed. Given the broad description of the use sought, the lack of clarity regarding the proposed use, and the size and layout of the existing buildings, I assessed the proposal subject to this appeal both as temporary accommodation and as houses in multiple occupation (HMO) (**Document SoCG/5**).

6.7. The Appellant’s SoC (**Document AD/3**) mentions, when referring to the proposed use of the site, the following characteristics:

“2.52 The proposed use is to be run in a manner similar to the previous use. It is intended that occupation would be by households of unconnected residents, and that the residents would have up to one-year tenancies, typically on licences, awaiting provision of permanent accommodation. There would be communal facilities and managed by a single entity with on-site wardens...”

2.53 ... residents in temporary accommodation [would be] carrying out normal patterns of daily life such as being in employment, education or having caring duties.

2.54 ... The current arrangement comprises 208 rooms whilst the proposed would accommodate 257 rooms.

2.55 ... The households are likely to have a local link to the area and would be already using the required infrastructure and services within their community”

- 6.8. There is no mention of the proposed use for the rest of the buildings on site (i.e. the principal's residence, the garages and the Temple). If a certificate were to be granted, then the use would be conclusively presumed over the entirety of the Site.
- 6.9. Further, it is necessary to note here that the proposed use does not include any office facilities or dining block, which are part of the lawful use of the site (as I address further below).
- 6.10. As set out in the Council's SoC (**paragraphs 4.41 – 4.51, Document AD/4**), I do not consider that the proposed use outlined by the Appellant would naturally fall within the ordinary meaning of the term 'hostel' but would more appropriately be described as HMOs. I identify their characteristics below.

Hostel use

6.11. The Housing Act 1985 (as amended) defines hostel in the following manner:

“hostel” means a building in which is provided, for persons generally or for a class or classes of persons—

- (a) residential accommodation otherwise than in separate and self-contained sets of premises, and*
- (b) either board or facilities for the preparation of food adequate to the needs of those persons, or both.*

6.12. The Courts have established that a ‘hostel’ use is not a term of art and there are distinctions to be made between many types of hostel use. In *Commercial and Residential Property Development Co Ltd v Secretary of State for the Environment* [1982] JPL 513 Glidewell J stated:

“In my view the word is not a term of art in relation to the duration of the stay. It embraces institutions - if that is a correct categorisation - which cover the whole range from long-term accommodation, as for instance a students' hostel or a nurses' hostel where one normally would expect that people were staying at least for a term, often for a year at a time or more, to, for instance, a youth hostel which by definition is occupied by transients - people who are staying for a day or two at the most.

For planning purposes the distinction between permanent accommodation and short-stay accommodation is important and may be vital.”

6.13. In *Panayi v Secretary of State for the Environment* (1985) 50 P. & C.R. 109 the Divisional Court upheld the inspector’s decision that if a building with self-contained flats became a hostel for homeless persons, then this could amount to a material change of use. The Court stated:

“the change could give rise to important planning considerations and could affect, for example the residential character of the area, strain the welfare services, reduce the stock of private accommodation available for renting and so forth. The fact that, in the broadest sense, the property continued to be used for residential purposes does not mean that there could not have been a material change of use.”

- 6.14. The categorisation of hostels in the Use Class Order have changed since the above decisions were made. Until 1994, hostels were contained in Class C1 of the Use Classes Order, along with hotels and since their removal from this class, hostels are a *sui generis* use.
- 6.15. Cancelled OPDM Circular 03/2005 clarified at paragraph 59 that *“A hostel usually provides overnight or short-term accommodation which may be supervised, where people (including sometimes the homeless) can usually stay free or cheaply”* and *“The question of whether a premises is a hostel or another use is a matter of judgement to be determined on a fact and degree basis.”*
- 6.16. One type of ‘hostel’ use could be a homeless hostel. The Centre for Homeless Impact, in their report *“What is a Hostel in 21st Century Britain?”* dated October 2024 (**Appendix E**), conducted a survey on hostel models for the homeless. The survey collected data from 317 individual services in 104 local authorities spanning England, Scotland, Wales, and Northern Ireland and identified a number of factors which define homeless hostels in today’s interpretation, these characteristics include:
 - **Physical characteristics:** *“most hostels were small with relatively few bed spaces — around a third of projects had 10 bed spaces or fewer. Residents in hostels were almost universally offered self-contained accommodation units with a private bedroom, and around a quarter also included access to a private kitchen and bathroom”*.

- **Age group or range:** “most hostels (78%) were mixed-gender, and 75% accepted residents of any age between 18 and 55, reinforcing the notion that hostels consist of primarily generalist accommodation that accepts a broad range of people.”
- **Support offer:** “most hostels shared a similar core support offer, focused on move-on, welfare and budgeting advice, and emotional wellbeing support. That said, the majority (66%) offered a more holistic range of services, including mental health, substance use services, among others.”
- **Management:** “most hostels provide 24 hour staffing, with three in four offering some level of 24-hour staffing.”
- **Length of stay:** “The most frequent length was between one and two years. Longer stays of two to five years were common. Residents often stayed longer than expected — for example, residents expected to stay for 6 to 12 months most commonly stayed for between one and two years.”

6.17. As the evidence suggests, the definition of hostel, in particular when providing temporary accommodation such as the type proposed, is not fixed and there are many different types of hostels with different characteristics. However, I note that the size of accommodation of a homeless hostel tends to be small, with very few examples of large (50 bedspaces or more) hostels; and these tend to provide core services and longer-term accommodation (average of 18 months) which is at odds with the terms proposed by the Appellant. I address this matter further in my proof.

Houses in Multiple Occupation (HMO)

6.18. An HMO, as defined in Section 254 of the Housing Act 2004 establishes that, “*this use occurs where tenanted living accommodation is occupied by persons as their only or main residence, who are not related, and who share one or more basic amenities*”.

6.19. As described by the Appellant, the proposed occupation of the site by unrelated persons or households as their main residence, with shared basic amenities such as communal facilities would fall within the definition of an HMO.

6.20. In addition, in Wandsworth, an HMO licence is required if all of the following apply to the property:

- It has five or more occupiers comprising two or more separate households, regardless of number of storeys
- It is a house or self-contained flat but is not a purpose-built flat situated in a block comprising three or more self-contained flats
- Some or all of the occupants share amenities such as bathrooms, toilets or cooking facilities
- At least one of the occupants pays rent, or the accommodation is linked to their employment
- It is the occupiers' main residence
- It is not an exempt property

6.21. Based on the available information it appears that an HMO licence would be required for the proposed use, on the basis that any payment made on behalf of the residents, for example by a local authority, would constitute rent.

6.22. As such, I am of the view that the proposed use as described by the Appellant, would comprise HMOs as a *sui generis* use and an assessment of the proposal, both as temporary housing (as set out in the proposed description of development) and as HMO was carried out within the officer's delegated report (**Document SoCG/5**).

6.23. Notwithstanding the above, I acknowledge that a change of use of land or buildings only requires permission if it constitutes a material change of use.

Matters related to the lawful use of the site:

b) Identification of the relevant planning unit(s):

- c) The existing lawful use of the planning unit(s) and whether that has been established through the (possibly deemed) grant of planning permission, or through the passage of time;
- d) If a use was given permission, whether that use has continued to remain or has subsequently changed; and.-
- g) Whether the existing use can be described as a hostel, restricted or otherwise.

The planning unit

6.24. Starting with part b), Development Control Practice (DCP) Online provides useful information regarding the definition of a planning unit. It acknowledges that the concept of the planning unit is one that causes considerable practice difficulty, because the courts are insistent that each case is to be considered on its own merits as a matter of fact and degree. As section 4.324 of DCP Online states:

The general rule has always been that the materiality of change should be assessed in terms of the whole site concerned, normally the whole of the area in the same ownership or the same occupation. But the consequence of applying that as a universal rule is that the larger the unit of ownership or occupation, the less likely is a change in the use of part of it liable to constitute a material change in the whole.

The unit of occupation is the most convenient starting point in identifying the planning unit, because that is normally the largest unit in which there is being carried on a set of functionally and physically interdependent activities. It is only normally possible to select a smaller unit in the same occupation where there is a functional and physical separation of activity. Both functional and physical separation are required before a smaller unit can be identified, since without functional separation the ancillary link

remains and without physical separation there is no smaller physical area which can be identified as a separate unit. With regard to the subdivision of the planning unit a material change of use does not occur automatically. The primary use of the new units may remain the same as the former primary use of the whole. But the subdivision may have the effect of changing the character of the use and may have planning consequences which indicate that a material change has occurred. For example it may form part of the process of intensification of the former use or result in the severance from the primary use of a use which was formerly authorised only by reason of that ancillary link. In summary a planning unit is the area of land which is to be looked at in order to assess what planning rights apply to all or part of that area.

6.25. Relevant guidance is provided by case law and *Burdle v Secretary of State for the Environment and another* [1972] 1 WLR 1207 is considered the main case on this matter, where the court held that there are three issues to consider, which I refer to as the 'Burdle test'. In that case, the Judge stated:

'What, then, are the appropriate criteria to determine the planning unit which should be considered in deciding whether there has been a material change of use? Without presuming to propound exhaustive tests apt to cover every situation, it may be helpful to sketch out some broad categories of distinction.

First, whenever it is possible to recognise a single main purpose of the occupier's use of his land to which secondary activities are incidental or ancillary, the whole unit of occupation should be considered. That proposition emerges clearly from G. Percy Trentham Ltd. v. Gloucestershire County Council [1966] 1 W.L.R. 506, where Diplock L.J. said, at p. 513:

“What is the unit which the local authority are entitled to look at and deal with in an enforcement notice for the purpose of determining whether or not there has been a ‘material change in the use of any buildings or other land’? As I suggested in the course of the argument, I think for that purpose what the local authority are entitled to look at is the whole of the area which was used for a particular purpose, including any part of that area whose use was incidental to or ancillary to the achievement of that purpose.”

But, secondly, it may equally be apt to consider the entire unit of occupation even though the occupier carries on a variety of activities and it is not possible to say that one is incidental or ancillary to another. This is well settled in the case of a composite use where the component activities fluctuate in their intensity from time to time, but the different activities are not confined within separate and physically distinct areas of land.

Thirdly, however, it may frequently occur that within a single unit of occupation two or more physically separate and distinct areas are occupied for substantially different and unrelated purposes. In such a case each area used for a different main purpose (together with its incidental and ancillary activities) ought to be considered as a separate planning unit.

To decide which of these three categories apply to the circumstances of any particular case at any given time may be difficult. Like the question of material change of use, it must be a question of fact and degree. There may indeed be an almost imperceptible change from one category to another. Thus, for example, activities initially incidental to the main use of an area of land may grow in scale to a point where they convert the single use to a composite use and produce a material change of use of the whole. Again, activities once properly regarded as incidental to another use or as part of a composite use may be so

intensified in scale and physically concentrated in a recognisably separate area that they produce a new planning unit the use of which is materially changed. It may be a useful working rule to assume that the unit of occupation is the appropriate planning unit, unless and until some smaller unit can be recognised as the site of activities which amount in substance to a separate use both physically and functionally.'

- 6.26. Applying the *Burdle* test, the starting point is to identify the planning unit based on the unit of occupation and ownership. Where it is possible to recognise a single main purpose of the occupier's use of his land to which secondary activities are incidental or ancillary, the whole unit of occupation should be considered. However, it may also be appropriate to consider the entire unit if there are several different uses and it is not possible to determine whether one is incidental or ancillary to another. Then, an assessment on whether the uses taking place on the land are separate on a physical and functional level from the main use would need to be made. If the use of the land is both physically and functionally part of the same use, then the correct planning unit is the unit of occupation. If there are two or more physically separate and distinct areas that are used for substantially different and unrelated purposes, each area of use should be considered as a separate planning unit.
- 6.27. For this appeal, the site is under the same ownership as is shown in a red outline in Figure 1 of this PoE. Figure 1 is an extract of the site location plan submitted with the planning application subject to this appeal, certificate application reference 2024/2089. This area includes Mount Clare House, student accommodation blocks, Picasso House, the Lodge, garages and the Temple.
- 6.28. Based on the above and applying the principles set by *Burdle*, I am of the view that the relevant planning unit comprises the whole unit of occupation, which comprises different buildings that have been occupied and used in

connection with an educational facility (University of Roehampton). I comment below on how the use should most likely be described.

Severance

6.29. DCP Online para 4.324 notes that it may be held that severance of dwellings which were formerly within an institutional planning unit constitutes a material change of use.

6.30. A review of the documents available related to the planning history of the site as presented in section 5 of this PoE appears to evidence that both Mount Clare and Downshire House were treated as a single planning unit back in 1960, to accommodate Garnett College. On this basis, I consider that it is likely that when ownership of these sites changed in the 1990s, this resulted in a material change of use from the permitted use by virtue of the separation of the planning units and the severance of the appeal site from the college it was originally built to serve. In which case, the lawful use of the site would then be that established by the occupation and use of the appeal site by the University of Roehampton.

The Lawful Use

6.31. I acknowledge that the UoR has withdrawn its objection to the certificate application; the basis for it doing this is unclear. I note that it provided a letter which made nine points on the application. The Council's response (which I agree with) is set out in the table at paragraph 3.2 of the Council's response (**Document AD/6**) to the Appellant's revised statement of case (**Document AD/3**) and the Letter from the University of Roehampton (dated 21 March 2005 **Document AD/5**). I do not repeat those points here.

6.32. Regardless the document mentioned above, I am of the view that, although the site is occupied by a single occupier, I consider that on the information

currently before me, it is in a mixed or composite use. I consider that this includes student accommodation blocks, offices, staff accommodation and a principal's house. In my view the evidence does not demonstrate that the uses at the site are not ancillary to one another. In particular the use of Mount Clare House does not appear to be ancillary to the student accommodation and vice versa. Rather it appears to have a separate use for administration of the UoR in general. Ultimately, I consider that insufficient information has been provided by the Appellant to be certain that the lawful use of the site can be comprehensively and accurately prescribed. However, such precision may not be necessary for the purposes of this certificate appeal. What is clear to me is that the lawful use of the site does not comprise a bare hostel use, whether or not the lawful use is derived from a grant of planning permission in and around 1960 or from the long use of the UoR (which I consider to be more likely). Further, even if it were appropriate to focus solely upon the accommodation blocks, I consider that these are properly described as student accommodation or halls of residences and not bare 'hostel'.

Matters relating to a material change of use:

- h) Whether, even if existing and proposed uses can both be described as hostels, there could (theoretically) still be a material change of use.*
- i) Whether the existing and proposed uses would be materially different, with particular regard to the nature of the use, effects on highway safety, parking, noise and disturbance, and local services.*

6.33. On matter h) I consider that the existing lawful use of the site cannot be considered as bare hostel. However, even if part of the existing lawful use and the proposed use could be described as hostels, in a broad meaning of the word, I am of the opinion that there could still be a material change of use if the character of both uses is different, just as a material change of use can arise from different residential accommodation types. In short, just as there are many different types of use which could be described as (for

example) 'residential' there are a number of different types of use which could be described as a 'hostel'.

6.34. As set out in the Council's SoC (**paragraph 4.41, Document AD/4**):

“...a hostel use is not a term of art and incorporates a wide range of uses which may have materially different planning impacts. It is noted that the use described by the Appellant is not circumscribed by length of tenure, level of support to be provided to the homeless people, and/or whether or not the persons accommodated would be in couples/family groups etc. Thus, taking the wide description of the proposed lawful use, it can be seen that this incorporates a broad range of uses with a broad range of impacts.”

6.35. The Council's SoC further cites the case of *Commercial and Residential Property Development Co Ltd v Secretary of State for the Environment* [1982] JPL 513 where the Judge stated:

‘In my view the word is not a term of art in relation to the duration of the stay. It embraces institutions - if that is a correct categorisation - which cover the whole range from long-term accommodation, as for instance a students' hostel or a nurses' hostel where one normally would expect that people were staying at least for a term, often for a year at a time or more, to, for instance, a youth hostel which by definition is occupied by transients - people who are staying for a day or who at the most.

For planning purposes the distinction between permanent accommodation and short-stay accommodation is important and may be vital.’

6.36. So, in that case the Judge acknowledged that there may be different types of hostel use. I therefore consider that, even if two uses might come within a broad umbrella term such as 'hostel', they may nonetheless amount to materially different uses. On this basis, it is therefore necessary to consider

the character of the existing and proposed use and whether they would be materially different from one another (as indicated under main issue (i)).

- 6.37. Further, and in any event, it is important to note that if the site is considered to be one planning unit (on which I have commented above) the lawful use, whether established by a historic permission or through the long use of the University of Roehampton, is not confined solely to student accommodation as it also includes other uses which comprises offices, staff accommodation and a principal's house. As I have set out above, if considered as one unit, the balance of evidence currently before me indicates that the site would be in a composite or mixed use as part of an educational facility. In particular, I do not consider that there is evidence that the offices, staff accommodation and principal's house should be considered as 'ancillary' to the student accommodation. It is important to bear this in mind as the proposed use would remove these uses and supplant them solely with the proposed temporary hostel accommodation. This, in my view, points towards there being a material change of use, as the site should be considered as a whole.
- 6.38. Further, I would note that the Appellant has not provided full evidence on the use of the site by the University of Roehampton whilst it has been present on the site. As such, my conclusion on the likely lawful use is based upon the limited evidence available. However, it is not necessary as part of this application/appeal to definitively state the lawful use of the site, only that the lawful use is not a bare hostel use.
- 6.39. Even if it was appropriate to 'zone in' on only the student accommodation blocks (contrary to the site location plan submitted with the application subject to this appeal) I consider that the character of the use of these blocks would be materially different from the proposed use.

6.40. The Council has provided, in its SoC at paras 4.60-4.65 (**Document AD/4**) a list of the likely characteristics of a use as student accommodation and temporary (hostel) accommodation as described as the Appellant.

6.41. I have set out a broad comparison between the character of a student halls of residence, in particular as used by the University of Roehampton who has been on site since 2001, and the use described by the Appellant in Table 1 below.

6.42. However, what I would observe at the outset is that if the certificate were still to be described as 'temporary accommodation' then this would potentially embrace a much wider range of potential uses (and therefore a wider range of different impacts). For example, it could allow stays of just one or two nights, as this is not prescribed in the certificate. Based on the case law set out above, I am of the view that this would be materially different to the use described by the Appellant and materially different from the lawful use.

6.43. Given that the Appellant does not appear to rely upon such a use at this appeal, I have not carried out a detailed analysis. However, if the Appellant does seek to argue that any type of temporary accommodation is not materially different from the lawful use then I would request the opportunity to respond.

6.44. Table 1 contains a number of characteristics which have been identified both by the Appellant in its Statement of Case and by the University of Roehampton in its August 2024 letter (**Document SoCG/8**). There well could be other relevant characteristics however as I have no evidence to address those, it would be entirely speculative to include them in this table. If the Appellant raises other characteristics, I kindly request the Inspector to allow me an opportunity to address these.

Table 1 Comparison of characteristic of student hall of residence vs. temporary accommodation

Characteristic	Student Hall of Residence³	Temporary accommodation (as described by the Appellant)
Household size	Individuals.	Individuals or households of unconnected residents.
Age group	Typically between 18-25 years old.	Unclear from evidence, likely to be adults over 25 years old and some families with children.
Place or residence	Mostly second home as students may have main home addresses, either in the UK or abroad.	Only residence.
Term of occupation and length of stay	Terms with periods of vacancy where the rooms may be made available to short-term students (e.g. summer school) linked to the educational facility.	Full year. Limited to 1-year tenancies.
Facilities	Shared kitchens and bathrooms. Common room, dining hall and other facilities available at a separate university campus.	Not specified, the Appellant indicates an increase from 208 rooms to 257 rooms which would suggest kitchen and toilets would be provided ensuite. No evidence has been provided to this point.
Common endeavour	Yes, educational and part of same institution. May be part of university clubs and societies. The University of Roehampton provides access to sport clubs, music clubs and social facilities such as the Union's club ⁴ .	None, backgrounds and aims would depend on occupiers.
Access to wider facilities	Local facilities plus access to university facilities including counselling and other health care, library, transport, student spaces among others.	Local facilities.
Payment of accommodation	Private, carried out individually by occupiers.	Unclear from the evidence provided but it would appear payment would be made by a Local Authority (not limited to Wandsworth Council).
Management	Managed by single entity with on-site staff.	Managed by single entity with on-site wardens.

³ Characteristics based on the description provided by University of Roehampton in their August 2024 letter (Document SoCG/8)

⁴ Source: <https://www.roehampton.ac.uk/student-life/>

6.45. Reviewing the characteristics above, I consider that the character of the proposed use would be materially different from the character of the lawful use of the site, even if there is solely a focus on the student accommodation. This is because, even if taking the accommodation on its own, it can be seen that the age profile of people in the accommodation would be different, with associated needs which do not match that of university students such as access to local schools, GPs or travel patterns. I look at these off-site impacts in more detail in the following paragraphs.

6.46. It is also noticeable that there would be a lack of a common educational endeavour which is important in this case since the use of the site, be it on its historical manner or its most recent use, has always been associated with an educational institution which provides other facilities and services as part of a college campus. To remove this common educational endeavour from the site, in my opinion, would lead to a material change in the character of the site which points towards a material change of use.

6.47. In addition, I consider that the broad terms sought under this lawful development certificate would allow all buildings within the site to be used as temporary accommodation, which would remove the use of a permanent dwellinghouse (possibly a principal's house), staff accommodation and office use. The supplantation of these uses is obviously material. Therefore, a change in the character of the use would point towards a material change of use.

6.48. Additional changes in the character of the use would also result from the off-site effects of the proposal which include transport, neighbouring amenity (in particular noise) and impact on local facilities. I examine these below.

Transport

6.49. On this matter, I rely upon the conclusions presented in the Proof of Evidence of Mr Marshall (**Document AD/10**) which indicate the proposed use, even in the broad terms proposed, would result in a material difference “*in private trips and light good vehicles*” which could, given the characteristics of the existing road, even result in an increase in highway safety matters.

6.50. Mr Marshall’s evidence also suggests that parking increase would increase: “*from 44% to 73% on the busiest night, as opposed to the extant use, which would increase it from 44% to 59%*”. He acknowledges that, even when this would not be severe, it would result in a “*noticeable and material difference to local vehicle owners*”. As such, the evidence before me indicates there would be a material difference between the existing and proposed uses regarding transport and access.

6.51. I also note from Mr Marshall’s evidence that identifying the potential impacts from the proposed use, as described by the Appellant, has been difficult. This is because there are no proposals of such a scale (more than 200 bedspaces) in a location such as this one (low PTAL at 1b) which has also been one of the main challenges I faced when assessing the proposal. Regardless, both Mr Marshall and myself have looked at the most similar cases to the one subject to this appeal and have assessed the likely impacts in a proportionate manner however, the burden of proof is on the applicant, and the information provided with this appeal regarding transport matters is incomplete, without proper assessment of the trip generation and other access matters, only focussing on car parking which begs the question as to why, even after Mr Marshall requested this information, it has not been provided by the Appellant.

Neighbouring Amenity

- 6.52. As shown in Mr Marshall's PoE, the Council is of the position that there would in fact be likely to be a material change in the trip generation arising from the proposed use as temporary hostel accommodation which would be material and noticeable to neighbours. On this basis, I am of the view that there would also be an associated change in noise disturbance resulting from the number of trips to and from the site which would be material on neighbouring amenity terms.
- 6.53. In addition, it is noted from the submitted parking beat survey included as part of the Appellant's Transport Statement that most of the parking areas that would be available for use would be located at Minstead Gardens. The increased demand in trips along with the impact on parking stress would result in materially different impacts upon the amenity of residents living in Minstead Gardens which could lead to material impacts upon noise disturbance with these neighbours.
- 6.54. I am also of the view that the Appellant has provided minimal evidence regarding potential noise impacts arising from the proposal and would like to bring to the Inspector's attention that the noise consultant's professional opinion letter highlights the existing and proposed uses would have different impacts.

Local services

- 6.55. Paragraphs 4.82 – 4.88 of the SoC (**Document AD/4**) presents the Council's position on this matter. Of relevance, the letter provided by University of Roehampton, dated 14 August 2024 (**Document SoCG/8**) shows that, as student accommodation, occupiers would mostly rely on services provided by the UoR such as free dedicated bus service, on-campus medical care and library and student support and leisure facilities,

instead of relying only on local services that are available to members of the public. Indeed, these are the types of facilities and services which one would expect to be available to occupiers of purpose built student accommodation.

6.56. The most recent data available regarding the estate of local services in the immediate area is from the Health Impact Assessment (HIA, **Appendix F**) prepared by for the Alton Estate regeneration. In this, the following extracts mention the University of Roehampton:

“3.9 The Site is located adjacent to the Roehampton University, students have access to their own free medical centre with which they can register. Out of term, the students can also attend the ‘parent’ Practice, the Putneymead Group Medical Practice.

4.9 Specifically, the health deprivation domain measures the risk of premature death and the impairment of quality of life through poor physical or mental health. The Wandsworth 013A and 023A LSOA’s are among 50% of the most deprived areas in England, ranked at 13,910 and 13,974 respectively. Comparatively, Wandsworth 013B [where the appeal site is located] is ranked at 9,074 out of the 32,844 LSOA’s in England, making it among the 28% most deprived in terms of health deprivation and disability.

APPENDIX 6: THE ALTON AND PUTNEY VALE (ROEHAMPTON) HEALTH PROFILE (page 20)

The University of Roehampton’s main campus is situated on Roehampton Lane. There are over 10,000 students enrolled at the university. Over 70% of students are female (due to the profile of courses offered) and 38% are from Black and Minority Ethnic (BME) groups. The majority of students (70%) are under 25 years old.

Although the university campus does not sit directly within the regeneration area, many students live in the local area. Students have their own specific health needs, particularly around emotional health, lifestyle behaviours (e.g. alcohol consumption), and sexual health; but despite this, there is often a lack of contact with services.”

6.57. The evidence available supports the University of Roehampton letter which indicates students living at Mount Clare campus did not regularly make use of local services. In my opinion therefore that the Appellant has not demonstrated that the draw on community services and facilities would not be materially different from the proposed use from the existing use of the site. This is relevant as the area is known for having stretched local facility services, in particular regarding health and educational services as noted in Local Plan. As such, an increase in demand for these local facilities would result in material impacts.

As demonstrated, I am of the opinion that the proposed use is likely to lead to materially different offsite impacts from the proposed use which again supports my view that the proposed use would be materially different from that which is lawful.

j) The relevance of policies that seek to protect student accommodation.

6.58. The Council notes that the Courts have confirmed that policy protection for a particular use may point towards whether there is a material change of use. I do not comment on legal matters, which are for the Council's advocate to address however, for this case, the policy protection for student accommodation set out in Local Plan policy LP28 reads:

“B. The loss of existing student accommodation will be permitted when it is demonstrated that the facility no longer caters for current or future needs and the floorspace is replaced by another form of residential accommodation that meets other Local Plan housing requirements.

Proposals for a change of use of existing student accommodation which result in the net loss of residential floorspace will only be permitted when:

1. The loss of student accommodation would be solely at ground floor level; 2. The development would replace the ground floor student accommodation with active ground floor uses; and 3. The proposed ground floor uses would pass the sequential test for main town centre uses in accordance with Policy LP43 (Out of Centre Development)."

6.59. In addition, Policy LP29 (*Housing with Shared Facilities*) states:

"LP29 Housing with Shared Facilities

A. Development proposals for new Houses in Multiple Occupation (HMOs) will be supported where they:

- 1. Do not result in the loss of housing suitable for occupation by families as defined in Part A of Local Plan Policy LP26 (Conversions);*
- 2. Do not result in an overconcentration of HMOs and other single-person accommodation at the neighbourhood level;*
- 3. Do not give rise to adverse impacts on the amenity of the surrounding properties and the character or the neighbourhood, including as a result of cumulative impacts;*
- 4. Have access to good levels of public transport (PTAL 4 or higher), and to shops and services appropriate to the needs of the intended occupiers; and*
- 5. Provide a good quality of accommodation, in line with Policy LP27 (Housing Standards).*

...

C. Development proposals for large-scale purpose-built shared living accommodation which is defined as being a 'sui generis' use will generally be resisted. Such accommodation will only be permitted where:

- 1. It is proposed on a site which is not suitable for conventional housing;*

2. *It is clearly demonstrated that large-scale purpose-built shared living accommodation is better suited to meeting the local housing needs than conventional housing; and*
3. *It would not lead to an overconcentration of single-person accommodation at the neighbourhood level.*

D. Where the principle of large-scale purpose-built shared living accommodation is accepted in line with Part C, proposals must:

1. *Meet criteria A1-A10 of London Plan Policy H16;*
2. *Demonstrate through the submission of a management plan that the development will be managed and maintained over its lifetime so as to ensure an acceptable level of amenity and access to facilities for its occupiers and would not give rise to unacceptable impacts on the amenities of existing residents in the neighbourhood; and*
3. *Provide a financial contribution towards the provision of affordable housing in the borough, in accordance with the London Plan.”*

6.60. As it can be seen in the wording of these policies, I consider that the differing policy treatment for student accommodation and large-scale housing with shared facilities is a clear indication that these have different requirements and characteristics further support for the view that the proposed use is materially different from the lawful use of the site. Further, the fact that student accommodation is, to an extent, protected by policy indicates that this type of development meets a particular need which is not met by other forms of accommodation.

7. SUMMARY AND CONCLUSIONS

7.1. In accordance with the reason for refusal and in conjunction with Mr Marshall's evidence, I am of the opinion that the proposal subject to this appeal would result in a material change of use of the site and therefore the Council's decision was well founded.

Taking account of the matters set out in this PoE, the Council's Statement of Case (**Document AD/4**) and in the delegated officer's report (**Document SoCG/5**), I remain of the view that:

- a) The correct planning unit most likely encompasses the entirety of the site, which contains a number of buildings which have been put to a mix of uses associated with an educational facility;
- b) Based on the available evidence it is more likely than not that the planning permission for the site was for 'training college with halls of residence' and that this was for development across the Mount Clare and Downshire House sites. It is more likely than not that the permission would have prescribed the educational use of the site;
- c) The Appellant has not provided evidence to demonstrate, on the balance of probabilities, that regardless of the existence of a deemed permission or not, the use of the entirety of the site is as bare hostel use;
- d) If the lawful use of the site has developed through the long use of the site by the University of Roehampton (which appears to be most likely) then on the evidence before me the lawful use can most likely be properly described as an educational facility in mixed use comprising student accommodation, staff accommodation, office use and a principal's house with garages. However, I am of the opinion that the Appellant has not provided full evidence of exactly how Site has been used by the UoR and therefore my conclusion is based upon the limited evidence available. It is unnecessary to determine the precise use of the appeal site for the purposes of this appeal. What is necessary to

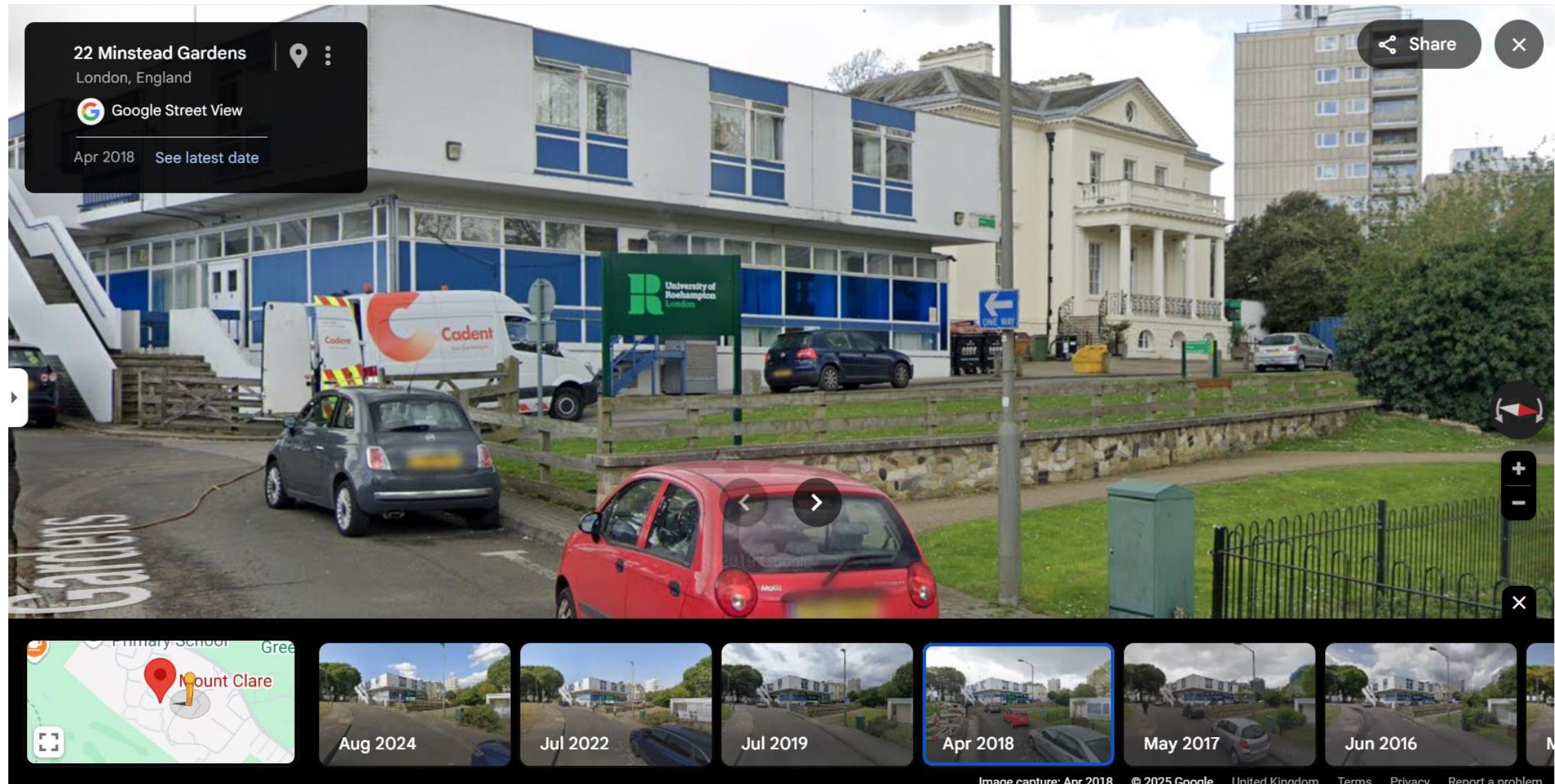
establish is that the lawful use is not a bare hostel use and I consider this is clear on the evidence;

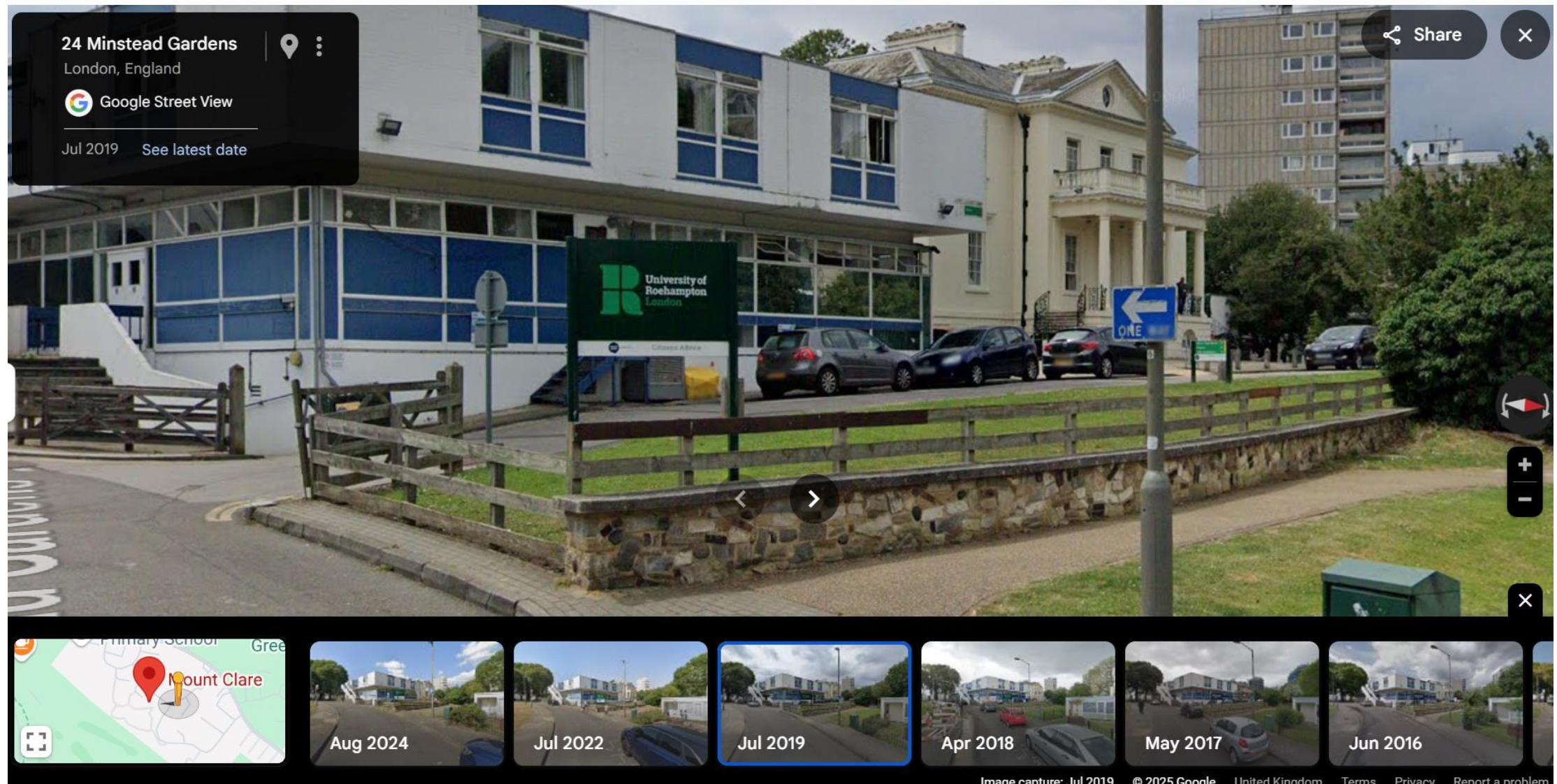
- e) The proposed use of the site as temporary accommodation in the broad terms applied for by the Appellant is more akin to an HMO use than to a bare hostel use;
- f) The character of the existing use which appears to be, on the evidence available, as an educational facility in mixed use comprising student accommodation, staff accommodation, office use and a principal's house with garages and the proposed use is materially different to the proposal; and.-
- g) This includes as a result of the off-site effects of the proposal, which cover matters of transport and highways; neighbouring amenity and access to local facilities; which have been demonstrated to be materially different thereby supporting the Council's position that the proposed use would represent a materially different use for which planning permission would be required.

7.2. On the above basis, I am of the view that the decision to refuse the application is well founded on the basis that the Appellant has failed to demonstrate on the balance of probabilities that their proposal would not involve a material change of use and would not be development requiring planning permission.

7.3. I therefore consider that the matters raised by the Council's assessment, supported by expert witnesses indicate that the proposed development is not lawful, and I respectfully request that this appeal is dismissed.

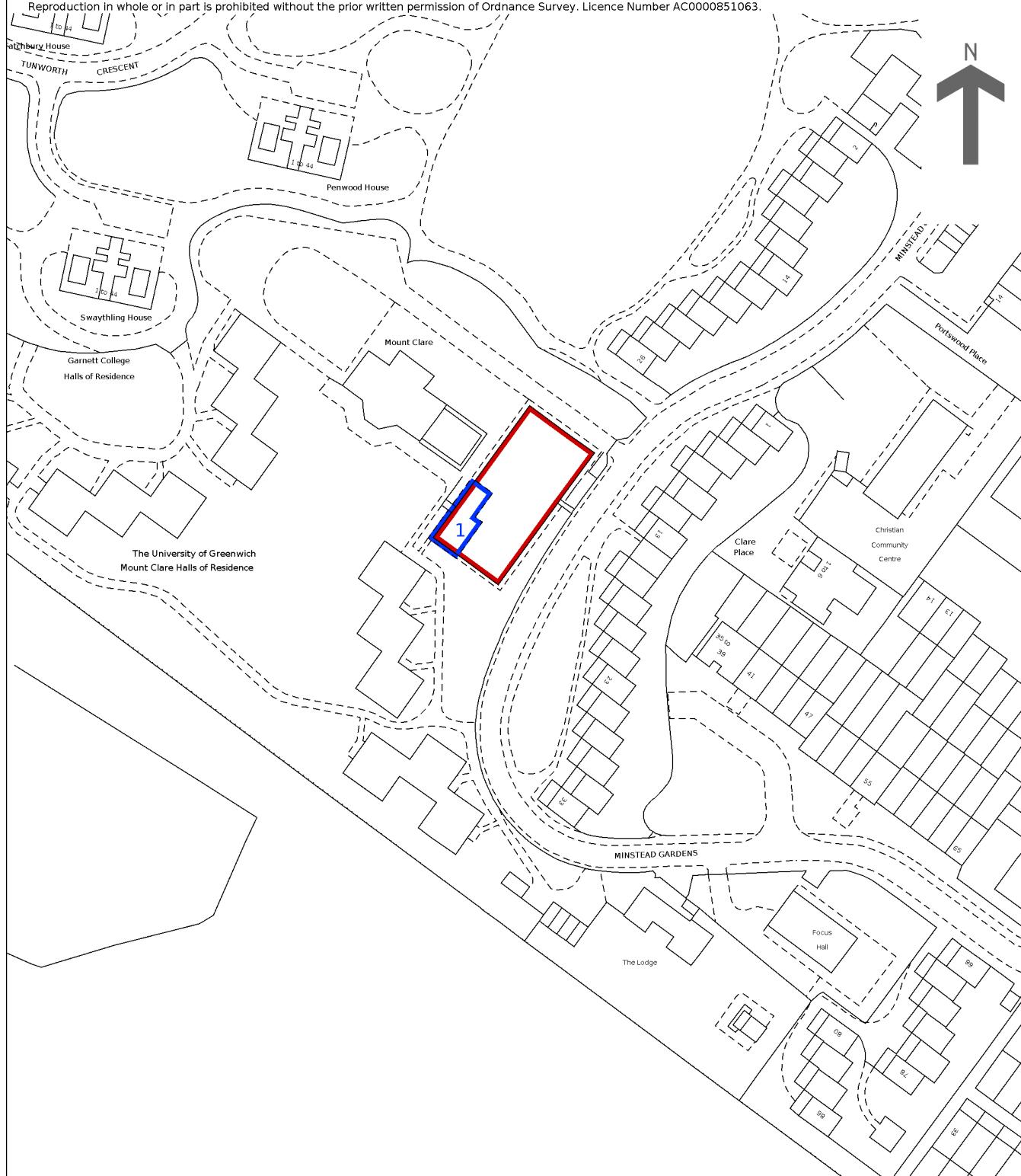








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This title is dealt with by HM Land Registry, Telford Office.

**Mount Clare Campus -
chronological history**

1948 - 1963

Date of document	Summary of matters covered in document	Appeal document reference
10-Feb-48	LCC compulsory purchase of Mount Clare site	Referred to by the Appellant in Document 6. Copy not provided to the Council.
07-Jan-55	Initial ideas from LCC to Ministry of Works regarding Mount Clare mentioning: <i>"(2) The future of Mount Clare was not settled but they hoped to let it and its grounds for private use"</i>	Document 9
11-Oct-57	LCC joint report by architect, valuer, and education officer of LCC education committee report referring to Mount Clare being a suitable location for a new college. Point 8 indicates that the consent of the Ministry of Housing and Local Government will be required to release the undertaking to preserve the building as scheduled building. Due to closeness to Richmond Park, consent from the Ministry of Works will also be required.	Document 10
16-Oct-57	Education Committee approved the relocation of Garnett College to Mount Clare	Referred to by the Appellant in Document 6. Copy not provided to the Council.
14-Feb-58	Hansard extract referring to delays for the proposals for Garnett College	Document 11 however the Council does not consider this document to be of relevance to this appeal.
13-May-58	Ministry of Works memo refers to: <i>"placing of single and two storey hostel buildings in the ground of Mount Clare abutting the Park boundary"</i>	Document 12
04-Jun-58	Ministry of Works memo indicating that the proposed buildings are too close to the boundary with Richmond Park	Document 13
19-Feb-59	LCC Architect to the Education (Further Education) Sub-Committee and the Town Planning (Architectural and Historic Buildings, etc) Sub -Committee indicating a proposal for <i>"the development of Mount Clare and Downshire House for training college and hostel purposes to replace Garnett College"</i> was discussed with the relevant offices and Ministries and that firmer plans could be drawn. The plans show: <i>"Plan A - Downshire House proposed for training college development and at present in the possession of the Housing Committee.</i> <i>Plan B - Mount Clare also in the possession of the Housing Committee now proposed for the provision of hostel accommodation for training college students"</i> Proposals <i>"are not likely to exceed 400 places in the college and accommodation for 240 students in the halls of residence..."</i> . <i>"It will now be necessary, subject to the concurrence of the Town Planning Committee, to submit a formal application to the Minister of Housing and Local Government"</i>	Document 14
25-Feb-59	Agenda paper for London County Council – Further Education Sub Committee meeting on 25 February 1959 mentions: <i>"Mount Clare and Downshire House - Proposed Use. Asking the Committee to inform them in January 1959 of the position as regards the proposed use for further education purposes of Mount Clare and Downshire House, Wandsworth"</i>	Council's SoC Appendix 1A
03-Mar-59	Agenda paper for London Planning (Architectural and Historic Buildings) Sub-Committee meeting on 3 March 1959 asking the Sub-Committee to concur in the decision of the Education (Further Education) Sub-Committee of 25 February 1959 to approve the proposals.	Council's SoC Appendix 1D
09-Mar-59	Town Planning (Architectural and Historic Buildings) Sub- Committee approved in principle the proposals <i>"for the development of Downshire House and Mount Clare, Wandsworth, as indicated in the drawings G.3020. P4/1 and P4/2 for training college and students' hostel purposes to replace the existing Garnett Training College"</i>	Document 15 and Council's SoC Appendix 1E

29-Sep-59	Plans ref G/3020/P5_1A. The plan shows a staff and dining block on the eastern side of Mount Clare House and fifteen two-storey hostel buildings in the rear grounds to the eastern and western sides. Mount Clare House was to be converted to provide students' common rooms. A principal's residence and two garages were also proposed to the south-eastern corner of the site, near the Temple. Of note, this plan does not match the latest recommendations from LCC on its report dated 04th May 1960 which refers to plan G/3020/P6/1-7	Document 16
30-Sep-59	Education Sub-Committee made recommendations	Document 17
	<p>6. If the Sub-Committee accept the proposals, they will wish to seek the concurrence of the Housing Committee in approving in principle the appropriation of Downshire House and Mount Clare from housing to education purposes. A report will be submitted on the transfer values of the properties in due course.</p> <p><u>RECOMMENDATION -</u></p> <p>(a) That the development of Downshire House and Mount Clare as indicated on the drawings G.3020.PA/1 and PA/2 for training college and students' hostel purposes to replace the existing Garnett Training College be approved in principle.</p> <p>(b) That, subject to the approval of the Town Planning Committee, an application be made to the Ministry of Housing and Local Government for his consent to the development of Downshire House and Mount Clare on the lines of the outline scheme submitted.</p> <p>(c) That the officers be instructed to report further on alternative arrangements for the provision of community centre and health centre facilities in the area.</p> <p>(d) That, subject to the concurrence of the Finance and Housing Committees, the appropriation of Downshire House and Mount Clare from housing to education purposes be approved in principle and that the Valuer be instructed to report on the transfer values involved in the appropriation.</p> <p>(e) That the Health and Housing Committees be informed in the relevant terms in the foregoing report.</p> <p>HUBERT BENNETT, Architect to the Council.</p>	
20-Oct-59	Council approved appropriation from Housing to Education	Referred to by the Appellant in Document 6. Copy not provided to the Council.
24-Mar-60	Issues with position of buildings and closeness to boundary	Document 18
28-Mar-60	Ministry of Works cannot agree to proposals in their current form	Document 19
04-May-60	<p>Agenda paper for London County Council – Further Education Sub Committee meeting on 4 May 1960 refers in item 4 to Garnett College, reads:</p> <p><i>"Architect and education officer and concurrent report by the comptroller of the Council - As to the development of Mount Clare and Downshire House for the provision of teaching and hostel accommodation for Garnett College"</i></p> <p>Joint report (28 March 1960) by the Architect and the Education Officer to the Education (Further Education) Sub-Committee (Architectural and Historic Buildings, etc.) Sub-Committee, presented to the committee on 4 May 1960</p>	Council's SoC Appendices 1F - 1H
	<p>good and the whole report.</p> <p><u>Details of new work proposed</u></p> <p>5. In addition to the adaptation of the existing properties the scheme provides for the following new accommodation:-</p> <p><u>Mount Clare</u> - Connected visually to the house itself by a sunken court, it is proposed to erect a two-storey building containing kitchen and dining rooms on the ground floor and resident staff bedrooms above. Grouped on either side of the house site so as to preserve the many beautiful trees which exist and to allow an uninterrupted view from the house over Richmond Park will be two informal wings containing six and nine two-storey study-bedroom units respectively all arranged in groups of three. These will be constructed of brick painted to harmonise with the painted stucco of the house.</p> <p>The principal's house, placed at the southern tip of the site, will be positioned partly over the site of an existing pond, the preservation of which is also included in the Council's undertaking to the Minister. The proposals involve the filling in of this pond and resiting it in the form of a shallow pool. The principal's house will be provided with a garage and there will be a large garage for staff use nearby. The new development is sited so as to preserve a freeboard along the boundary of Richmond Park of a minimum width as agreed with the Ministry of Works.</p> <p><u>Downshire House</u> - To the south of the house and connected</p> <p><u>RECOMMENDATION -</u></p> <p>(a) That, subject to the necessary approvals, the scheme as shown on drawings Nos. G/3157/P6/1-6, G/3020/P6/1-7, G/3324/PA/1-5 and G/3325/P1 and P2 for the development of the sites of Mount Clare and Downshire House, Wandsworth, for use by Garnett College as a training college and hall of residence be approved and, subject to the concurrence of the General Purposes Committee, the Architect be authorised to prepare working drawings and contract particulars and invite tenders as indicated in the report.</p> <p>5. P.T.O.</p>	
	Signed minutes from a meeting of the Further Education Sub-Committee of the Education Committee held at the County Hall, SE1 on Wednesday 4 May 1960	

	<p>account of £16,145 for adaptations and repairs and redecoration of Mount Clare and Downshire House, Wandsworth, shall be met from the sites of the Town Planning Committee, to the Housing Committee's concurrence in the use of the district heating scheme at Alton Estate and to other considerations, the scheme shown on drawings Nos. G/3157/P6/4-6, G/3020/P6/7, G/3224/P1-5 and G/3225/P1-2 for the development of the sites of Mount Clare and Downshire House, Wandsworth, as training college and hall of residence to rehouse Garnett College, Southwark, be approved and that a recommendation to the following effect be submitted to the Committee:-</p> <p>That, subject to the completion of the consultations required by the General Development Order, the following effect be submitted to the Council:-</p> <p>That estimate 9336 of liability on capital account of £461,000, submitted by the Finance Committee for the development of the sites of Mount Clare and Downshire House, Wandsworth, for the use of Garnett College, Southwark, be approved.</p> <p>(b) That, subject to the approval of the estimate referred to in the foregoing resolution (a) and to the concurrence of the Education Committee in expenditure on capital account not exceeding £20,000 by sanctioning for preliminary expenses in connection with the work specified therein and the Architect be authorised to prepare working drawings and contract particulars and invite tenders from firms on the prescribed list for new building work subject to the concurrence of the General Purposes Committee from four principal firms, namely, Holland & Hannen and Cubitts Ltd., F.G. Winter, Ltd., Dove Bros. Ltd., and Trollope and Colls, Ltd., for the repair, strengthening and redecoration of the buildings to be retained at Mount Clare and Downshire House.</p>	
16-May-60	<p>WE RECOMMEND -</p> <p>6. (a) That the Committee do approve, so far as they are concerned the scheme as shown on drawings Nos. G/3157/P6/4-6, G/3020/P6/1-7, G/3224/P1-5 and G/3225/P1 and P2 for the development of the sites of Mount Clare and Downshire House, Wandsworth for use by Garnett College as a training college and hall of residence.</p> <p>(b) That, subject to the agreement of the Education Committee, to the Finance Committee's agreeing to submit the estimate to the concurrence of the General Purposes Committee under the Town and Country Planning General Development Order, 1950, a recommendation to the following effect be submitted to the Council jointly with the Education Committee:-</p> <p>That estimate 9336 of liability on capital account of £461,000 for the development of Mount Clare and Downshire House, Wandsworth, Putney, for use by Garnett College, be approved.</p> <p>(c) That, subject to the approval of the estimate given to the General Development Order, the Education Committee, to the Finance Committee, to sanction expenditure on capital account not exceeding £20,000 for preliminary expenses in connection with the work specified in resolution (a) foregoing; and, subject to the concurrence of the General Purposes Committee, to authorise the Architect to prepare working drawings and contract particulars on a fixed-prices basis and invite tenders from Holland & Hannen and Cubitts, Limited, F. G. Winter, Limited, Dove Brothers, Limited, and Trollope & Colls, Limited only.</p> <p style="text-align: right;">L. J. STYLES, Chairman</p> <p>RESOLVED - That the report be received.</p>	Document 20
27-Jun-60	The Council considers this item is not relevant to the appeal as it is not a planning document.	Document 21
08-Jul-60	Wandsworth consultation on the proposal	Document 22 and Council's SoC Appendix 2A
05-Oct-60	No objections from Wandsworth on the proposal	Document 23 and Council's SoC Appendix 2B
11-Oct-60	<p><i>"Redevelopment of the site at these premises for use as a training college with halls of residence for students, to house Garnett College (Southwark) ... With the agreement from the Town Planning Committee we have approved a scheme for the provision of halls of residence and a house for the principal of Garnett College on the site of Mount Clare and for the original residence to be adapted for use as students' common-rooms..."</i></p> <p><i>The new buildings for the college on this site will comprise a two-storey building, containing a kitchen and dining-rooms on the ground floor, with accommodation for resident staff above, sited close to the existing house with access to it across a sunken court and fifteen two-storey halls of residence, each containing twelve study-bedrooms, sited in groups of three on either side of the house so as to preserve the many trees on the site... The principal's house will be sited at the southern tip of the grounds. It is necessary to preserve an ornamental temple and pond on this part of the site and the siting of the principal's house will involve the provision of a shallow pool to replace the pond."</i></p>	Document 24
06-Nov-61	<p>LCC Education to Governing Body, update on works:</p> <p><i>"3. Thus, while the study bedrooms, common rooms, etc., may well be ready by September 1962, the dining and staff accommodation clearly will not. On the other hand the teaching block should now be ready for January 1963, so that, if occupation is deferred until that date, all the college buildings could be taken over at one time."</i></p>	Document 25
08-Jun-62	Hansard extract, not relevant to this appeal	Document 26

04-Sep-63	<p>Visitation report dated 4 December 1963</p> <p><i>"3. Buildings and Equipment</i></p> <p><i>On previous occasions Visitors have been critical of the buildings occupied by the College. It is therefore a particular pleasure to record that on this visit they were greatly improved with the teaching and residential accommodation. Although the College has exchanged a central site in London for one on the western outskirts, this move is amply compensated for by the excellent buildings and gracious setting in which the College now carries out its work...</i></p> <p><i>The modern teaching block blend happily with the adjacent Downshire House, a historic building which has been successfully restored and adapted as an administrative centre for the College. The disadvantages arising from the siting of the residential buildings at some distance from the teaching and administrative blocks are offset by the excellence of the accommodation provided. Fifteen well-designed hostel units housing twelve students in each unit, dining rooms, kitchens, accommodation for resident wardens and domestic staff, as well as the Principal's house, are grouped around Mount Clare House. This historic house is of considerable architectural merit and has been restored, decorated and furnished to provide a social centre for the College of great elegance and charm..."</i></p>	Document 27
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What is a Hostel in 21st Century Britain?

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In Brief

There is no universally accepted definition of what a hostel is. This report summarises the characteristics of a large sample of hostels in the United Kingdom.

Most hostels in the UK are small with relatively few bed spaces - around a third of projects had 10 bed spaces or fewer.

Residents in hostels were almost universally offered their own private bedroom, and around a quarter also had access to a private kitchen and bathroom.

Four in five of hostels are mixed-gender and three in four accepted residents of any age between 18 and 55.

Women's only, and young people's hostels made up a substantial minority and most hostels provide 24 hour staffing, **with three in four offering either waking or sleeping night-time cover**.

Only 1 in 10 projects had a ratio of more than 10 residents per staff member and three in five of projects use volunteers in some capacity.

The majority of hostels (61%) allow residents to consume alcohol on the premises, but a significant proportion (37%) do not allow consumption of drugs or alcohol. Notably, 23% permit consumption of drugs on the premises.

The most frequent length of stay **was between one and two years. Longer stays of two to five years were common**. Residents often **stayed longer than expected** given what the hostels were set up to provide.

Most hostels (62%) had more than 30% moving into long-term housing. Only a relatively small group (28% of hostels) had 20% or more of their clients experience negative outcomes such as eviction, or abandoning their accommodation.

Overall, the data suggests a mixed picture where, for many (if not most) residents, **a hostel stay is often not the final step on a pathway to settled housing**.

Hostels are primarily publicly funded. 86% received funding from Housing Benefit/Universal Credit and 64% received direct funding from local authorities via housing-related support funds. Only 38% of projects received funding from charitable sources such as grants (9%) or donations (29%).

The average cost of a hostel bed per year was £27,785, with the majority costing less than £33,000 per year. Smaller hostels cost more per bed space.

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Recommendations

This survey is a first step towards developing a framework for defining what a hostel is. By describing their characteristics of a large sample of hostels in the UK, this offers a base to build a more sophisticated typology.

A typology could seek to explore further some of the relationships identified here, including:

- the relationship between bed space cost, size of project, and outcomes. This could also explore how both very small and very large hostels intersect with other categories of accommodation-based services, such as smaller and more intensively staffed supported housing projects.
- the relationship between approaches to move-on (e.g. duration of stay for different cohorts and support services offered), their outcomes, and costs.
- the relationship between varying types of staffing and support to cater to the needs of different populations, their outcomes, and costs. This could also explore how hostels support individuals with specific needs (e.g. learning disabilities), especially considering many hostels offering accommodation do not explicitly target these groups but accept them in practice.

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Foreword

It is with a mix of pride and sorrow that I present this report on the state of hostels in 21st century Britain. This study not only explores the current landscape but also looks ahead to the future of this vital segment of the homelessness sector. The report stands as a testament to the dedication, insight, and passion of my late colleague, Jeremy Swain, whose vision and hard work were instrumental in bringing this project to fruition.

Jeremy spent 34 years working at Thames Reach, which helps people who are experiencing or at risk of homelessness, and for 19 years was its chief executive. He joined the then Ministry of Housing, Communities and Local Government, first as Deputy Director of its Homelessness and Rough Sleeping Directorate and then as a Senior Adviser to its Covid-19 Rough Sleeping Taskforce. He was also an associate at the Centre for Homelessness Impact.

His unwavering dedication to improving and innovating within the homelessness sector is why he was so committed to this project to map the typology of homelessness hostels, as a first step towards evaluating their efficiency and cost-effectiveness. Like me, he believed in the ideal of rapid rehousing, ensuring people don't need to go through temporary accommodation. However, when this isn't possible or desirable for whatever reason, it is crucial that hostels offer positive experiences, with a strong community focus.

In crafting this report, we have drawn upon extensive research and data analysis to provide a thorough examination of the current state of hostels in the United Kingdom.

We believe that this is the largest study of its kind, drawing as it does on data from 317 hostel services in 104 local authorities areas in all parts of the UK. Much of its reach is a tribute to Jeremy's work on this project: his deep knowledge of the homelessness sector, his relationships with people working within it, and his empathy and instinctive respect for individuals who navigate this system to receive support. He knew from experience what it is like, as a manager or senior member of staff on shift in a busy hostel, to find time to fill in a survey form when a hundred and one priorities and real life crises seem to be stacking up around you. But he knew, too, how to convince busy professionals working in people-facing roles in homelessness that collecting accurate data can be the key to unlocking system-wide improvements.

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It is fitting that we dedicate this report to Jeremy, whose legacy will continue to inspire and guide us. His belief in the power of the best hostels to provide a platform for permanent exits from homelessness was profound, and it is our hope that this report honours his memory by contributing valuable insights and direction to the sector he loved so dearly.

May this report serve not only as an informative resource but also as a tribute to Jeremy's enduring impact on the hostel sector and his indelible mark on all of us who had the privilege of working with him.

Sincerely,



Dr Ligia Teixeira is Chief Executive of the Centre for Homelessness Impact



What is a Hostel in 21st Century Britain?

By Guillermo Rodriguez-Guzman, Michelle Binfield
and Rob Anderson

October 2024

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About the Centre for Homelessness Impact

The Centre for Homelessness Impact champions the creation and use of better evidence for a world without homelessness. Our mission is to improve the lives of those experiencing homelessness by ensuring that policy, practice and funding decisions are underpinned by reliable evidence.

Person-first language

This report uses person-first language, putting a person before their circumstances. This is to avoid defining an individual by homelessness, which should be a temporary experience.

Centre for Homelessness Impact
www.homelessnessimpact.org

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Summary

Hostels play a significant role in the response to homelessness and rough sleeping in the UK. However, evaluating the efficiency and cost-effectiveness of hostels poses a challenge due to the absence of a universally accepted definition of what a hostel is. To address this gap, the Centre for Homelessness Impact (CHI) launched a research project with the ambition of building an evidence-based typology of hostel provision with data from hostels across the UK. This typology offers a framework for defining the characteristics of a hostel as well as systematically comparing different models and allowing for better evaluation and learning.

As a first step on this journey, we conducted a survey on hostel models. The survey, a collaborative effort between the CHI and the Cambridge Centre for Housing and Planning Research (CCHPR) took place between April and July 2022. Data were collected from 317 individual services in 104 local authorities spanning England, Scotland, Wales, and Northern Ireland. The survey covered a wide range of topics including physical attributes, client demographics, support services, policies, staffing, legal and tenure matters, management practices, regulations, funding sources, costs, resident data collection, and outcome measurement

This data from 317 hostel projects, provides for the first time an empirical basis for defining a 'typical hostel' and highlighting the ways in which future research could develop a more sophisticated typology to map variations in hostel provision. Additionally, the data presents a range of insights to assist policymakers, practitioners and researchers in understanding the characteristics and activities of hostels in the UK today.

In terms of the **physical characteristics**, despite examples of large projects (50+ beds), **most hostels were small** with relatively few bed spaces – around a third of projects had 10 bed spaces or fewer. **Residents in hostels were almost universally offered self-contained accommodation units with a private bedroom**, and around a quarter also included access to a private kitchen and bathroom.

The survey found most hostels (78%) were mixed-gender, and 75% accepted residents of any age between 18 and 55, reinforcing the notion that hostels consist of primarily **generalist accommodation that accepts a broad range of people**. That said, **women's and young people's hostels made up a substantial minority** of the sample; 8% of projects accepted women only, and around 25% accepted only residents aged 18 to 25.

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Hostels frequently **accepted cohorts who were not part of their target population**. For example, individuals with learning difficulties were only targeted by 39% of hostels, but they were accepted in the majority (79%). This suggests that, although intended for a general needs population, hostels frequently support individuals with specific specialist needs.

Relatedly, we found that most hostels shared a **similar core support offer**, focused on **move-on, welfare and budgeting advice, and emotional wellbeing support**. That said, **the majority (66%) offered a more holistic range of services, including mental health, substance use services, among others**.

In terms of how hostels are managed, we found **that most hostels provide 24 hour staffing**, with three in four offering some level of 24-hour staffing. The **intensity of staffing** support varied, but notably few projects reported very low numbers of staff compared to residents: only 1 in 10 projects had a ratio of more than 10 residents per staff member. Volunteers play an important role in hostel staffing, with 60% of projects using volunteers in some capacity. Volunteers appear to be used to complement paid staff, rather than as substitutes.

The data also highlights that **hostels vary considerably in how they manage substance use on their premises**. The majority (61%) allow residents to consume alcohol, but a significant proportion (37%) do not allow consumption of drugs or alcohol. Notably, 23% permit consumption of drugs on the premises; this is likely to take the form of de facto tolerance of drug use amongst residents rather than formal managed consumption.

Duration of stay in hostels were **often fairly long**. The most frequent length **was between one and two years. Longer stays of two to five years were common**. Residents often **stayed longer than expected** – for example, residents expected to stay for 6 to 12 months most commonly stayed for between one and two years.

Hostels are often considered a stepping stone to long-term housing for people experiencing homelessness. We found that **most hostels (62%) saw higher rates (30%+) of positive move ons** into long-term housing, and only a relatively small group (28% of hostels) saw high rates (20%+) of negative outcomes such as eviction, or residents abandoning their accommodation. We also noted that a substantial minority (39%) of hostels indicated more than a fifth (21%+) of their residents experienced a 'sideways move', meaning their stay ended with transitioning to different emergency or temporary housing. Overall, the data suggests a mixed picture where, for many (if not most) residents, **a hostel stay is often not the final step on a pathway to settled housing**.

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The data shows that **hostels are primarily publicly funded**. 86% received funding from Housing Benefit/Universal Credit and 64% received direct funding from local authorities via Housing-related Support funds. Only 38% of projects received funding from charitable sources such as grants (9%) or donations (29%).

The **average cost of a hostel bed per year was £27,785**, with the majority costing less than £33,000 per year. There was **considerable variation between projects in overall expenditure**, with a notable sub-group (22%) of very large projects with a total expenditure of over £1 million annually.

We found some evidence of **economies of scale**. Hostels with fewer than 30 bed spaces cost more per bed space than in the largest hostels with 75 or more bedspaces. It is important to note that we were not able to assess the relationship between these economies of scale and outcomes for residents i.e. the relative value for money of different hostel sizes.

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Conclusions

As a first step towards developing a framework for defining the characteristics and features that constitute a hostel, we have drawn upon the above analysis of the characteristics and features of this sample of hostel provision in the UK. We propose a set of hostel provision typical characteristics, constituting a 'base type' upon which a more sophisticated typology might be built through future research.

Hostels could be typified as primarily **generalist accommodation with fairly open acceptance criteria**, noting there are clearly defined sub-categories targeting women and young people exclusively. To build on this, a typology should seek to better understand how hostels work with individuals with specific needs (e.g. learning disabilities), especially those that don't explicitly target these groups but accept them in practice. This should explore whether such hostels constitute distinct sub-types, or if this activity is driven by a need for generalist provision to backfill in the absence of more appropriate specialist provision.

Hostels could be typified as providing a '**core service**' of **move-on support, welfare and budgeting advice, and emotional support**. As most offer some level of specialist support beyond this, a typology should seek to systematically assess variations in additional services offered and how these relate both to populations served and outcomes.

In terms of physical characteristics, hostels could be typified as generally encompassing **fairly small sites providing self-contained accommodation of 10–20 bed spaces, often with private access to facilities**. A typology could helpfully seek to refine how both very small and very large hostels intersect with other categories of accommodation-based services, such as smaller and more intensively supported housing projects.

Hostels are typified by a **24-hour staffing model**. A more sophisticated typology should explore how variations in staffing support interact with populations served, services provided, outcomes, and costs.

Hostels could be defined using **target outcome** and **typical duration of stay**, with most hostels aiming to provide **temporary housing of 6 months to 2 years with the goal of moving on to settled housing**. Further work on a typology would seek to better understand the variations in approaches to move-on (e.g. duration of stay for different cohorts and support services offered) and outcomes, and comparisons with other accommodation types which seek similar outcomes.

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Finally, in terms of **cost and funding structure**, hostels can now be understood as costing typically **around £27,000 per bed space per year, primarily funded by Housing Benefit**. A typology could seek to further explore the **relationship between bed space cost, size of project, and outcomes** to better assess the value for money of different types of provision. It could also seek to compare the cost of hostel-type beds to other forms of accommodation-based services, such as statutory Temporary Accommodation or supported housing.

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Acknowledgements

We are particularly grateful to providers of hostels services who supported this project. The active support and participation of The Salvation Army was central to achieving data returns from a critical mass of organisations. We are also grateful to the Single Homeless Project, Two Saints Limited, Framework, Centrepoint and St Mungo's and to all other organisations that took part.

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Introduction

Hostels play a significant role in the response to homelessness and rough sleeping in the UK. However, we lack a universally accepted definition of a hostel. In response, the Centre for Homelessness Impact (CHI) launched a research project aiming to build an evidence-based typology of hostel provision with real data from hostels across the UK. This typology will offer a framework for precisely defining the characteristics and features that constitute a hostel. To begin, we conducted a survey to gather data on hostel characteristics and performance indicators.

The survey, conducted by Cambridge Centre for Housing and Planning Research (CCHPR) and commissioned by CHI, took place between April and July 2022. Data were collected from 317 individual projects situated across 104 local authorities spanning England, Scotland, Wales, and Northern Ireland. The survey covered a wide range of topics including physical attributes, client demographics, support services, policies, staffing, legal and tenure matters, management practices, regulations, funding sources, costs, resident data collection, and outcome measurement.

The data were utilised to examine differences and similarities across hostels, and identify key characteristics that differentiate various types of hostels in important ways. These core attributes form the basis for creating a typology.

Survey participants and methods

The purpose of this survey was to describe the features of UK hostels, and inform the development of CHI's hostel typology.

The online version of the survey was designed and administered using Qualtrics, a survey software, and was available for a period of five weeks. We employed a convenience sampling method, distributing the survey link directly to the hostel providers in the CHI database and circulating it among various hostel projects. Hostels were also given the option to complete a paper survey. Questionnaires were available in both Excel and Word.

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Survey instrument

The questionnaire, consisting of 44 questions and covering 8 areas can be found in [Appendix 1](#). The topics addressed include:

1. Respondent's contact details
2. Data relating to the identification of the hostel project
3. Physical dimension of the hostel project
4. Type of groups targeted, accepted and excluded
5. Support services offered
6. Legal and tenure-related matters
7. Funding, management and regulation of the hostel
8. Outcomes measured and data collection.

Because winter shelters and severe weather shelters are very short term, very communal, and likely to include only camp beds or cubicles, these types of accommodation were excluded from the survey. Additionally, self-contained flats or bedsits with housing-related support provided on a visiting basis (e.g. Housing First), whether dispersed within general needs housing or in a single building, were also excluded from the survey on the basis that these are intended as long-term/permanent housing and there is no communal shared space on site.

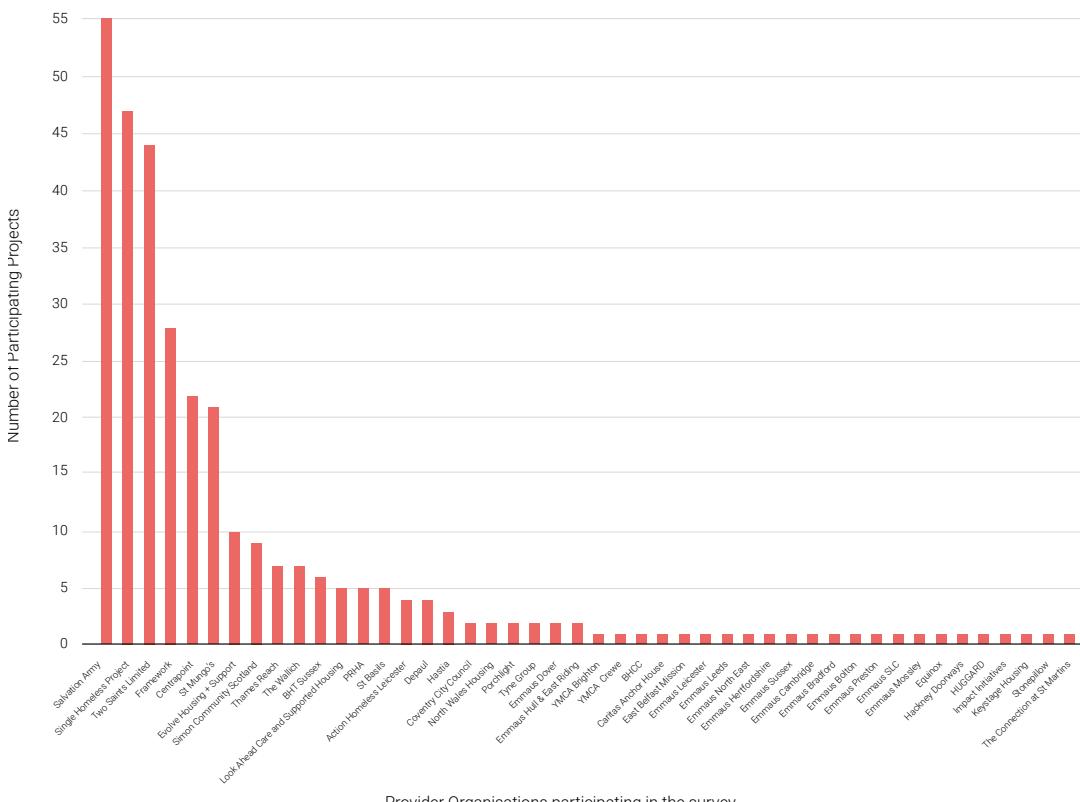
Survey Findings and Insights

1. Survey respondents

Characteristics of survey respondents

Responses from 317 projects associated with 45 provider organisations were included in the study (Figure 1). Nearly half of the surveyed hostels (46%) were linked to three organisations: The Salvation Army (55 hostels), Single Homeless Project (47 hostels), and Two Saints Limited (44 hostels). Approximately 22% of the surveyed hostels were affiliated with Framework (28 hostels), Centrepoint (22 hostels), and St Mungo's (21 hostels). 24 organisations each reported a single hostel project (Figure 1).

Figure 1. Number of projects by provider organisation



Source: CHI Nationwide Hostel Survey (April–July 2022)

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Projects participating in the survey were situated across 104 local authorities throughout England, Wales, Scotland and Northern Ireland. A significant proportion, 37% of projects, were concentrated in nine English local authorities: Portsmouth City, Southampton City, Nottingham City, Brighton and Hove and the London Boroughs of Lambeth, Islington, Camden, Lewisham and Hammersmith & Fulham. Over half, 53%, of the local authorities represented in the survey only included information for one hostel.

The geographic distribution reflects the operational areas of the service providers through which the survey was distributed (e.g. Thames Reach is London only, but St Mungo's are nationwide).

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2. Physical Characteristics of Hostel Projects

Structures Utilised for Hostels

Hostel projects were primarily located in purpose-built housing (49%) and adapted residential properties (42%) (Table 1), with purpose-built accommodations tending to be larger than adapted residential properties (Figure 2.)

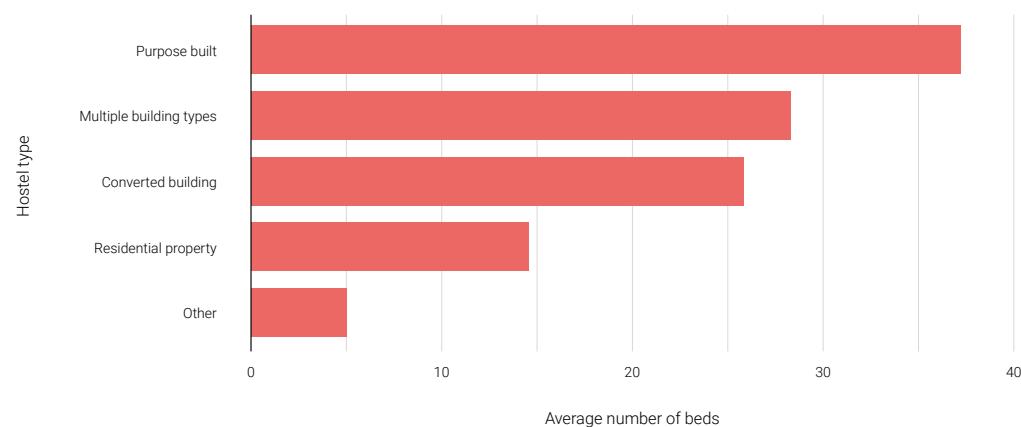
Table 1: Building type used for hostel

Building type	% of total, n= 317 ^a
Purpose-built housing	49%
Residential property	42%
Converted building	5%
Hotel/guesthouse	1%
Other	9%

Source: CHI Nationwide Hostel Survey (April–July 2022)

^a Percents do not add to 100% due to rounding

Figure 2: Average number of bed spaces by type of building



Source: CHI Nationwide Hostel Survey (April–July 2022)

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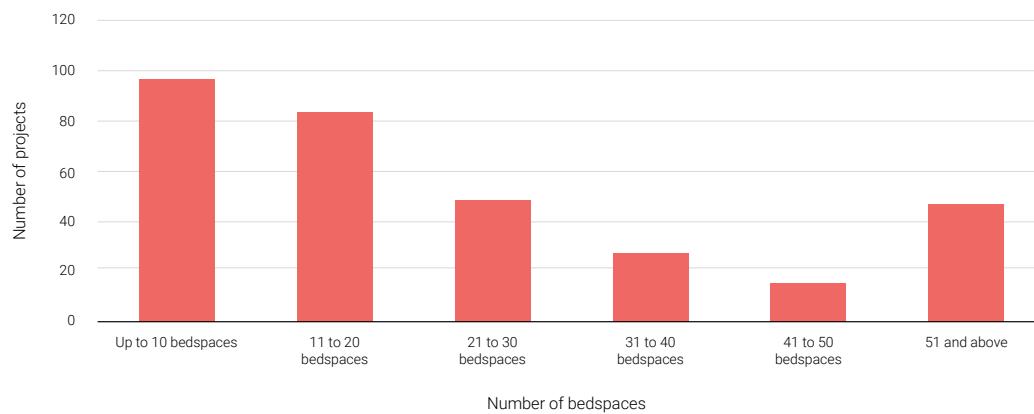
Bed spaces

As shown in Figure 3, while hostels in the sample varied significantly in the number of beds they offered, most were either relatively small or very large.

About one third (97 projects, 30.6% of the sample) offered 10 or fewer bedspaces, with one in four (84 projects, 26.5%) providing between 11 and 20 bedspaces. Some projects reported only two beds; such a small project might be regarded as falling into the category of Supported Housing rather than 'hostel' project. This underscores the lack of consensus amongst practitioners regarding what counts as a 'hostel'.

In contrast to these smaller hostels which made up the majority of projects, the next largest group of projects were comparatively large, with more than 51 bed spaces (46 projects, 14.5%).

Figure 3: Number of hostel projects by number of bed spaces



Source: CHI Nationwide Hostel Survey (April–July 2022)

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Sharing facilities

About a quarter of all units had exclusive use of bedroom, bathroom and kitchen; another quarter had exclusive use of bedroom and bathroom (ensuite) but shared kitchens. The most common type of facility are those where people have their own room with shared use of all other facilities including bathrooms and kitchens (around 43%).

Projects with shared bedrooms were rare. Only 3.8% of all projects had at least one unit with shared bedrooms for more than 4 people, and 6% had at least one unit with shared bedrooms with 2–4 people. (Data not shown). Together, these represent just around 3.5% of all units in the sample. (Table 2, Figure 4). Hostels usually tend to have most (but not all) of their units in a single category.

Table 2: Percentage of bedspaces by the level of sharing

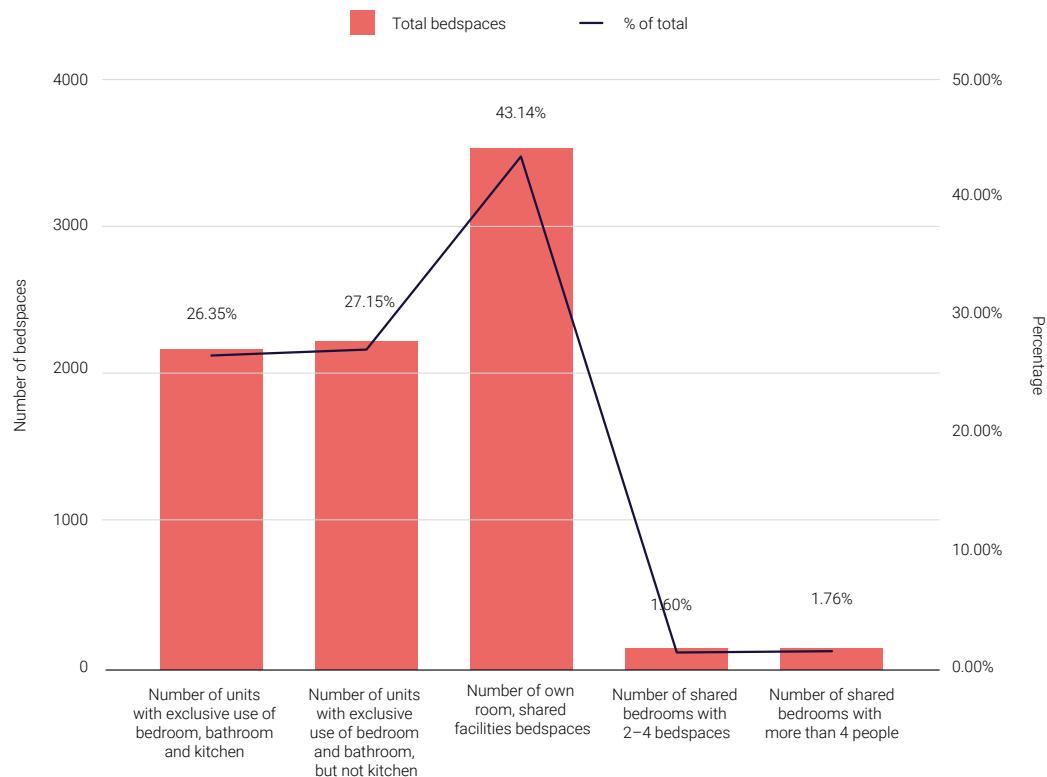
Level of sharing	Total bedspaces in the sample	% of total
Number of units with exclusive use of bedroom, bathroom and kitchen	2155	26.35%
Number of units with exclusive use of bedroom and bathroom, but not kitchen	2220	27.15%
Number of own room, shared facilities bedspaces	3528	43.14%
Number of shared bedrooms with 2–4 bedspaces	131	1.60%
Number of shared bedrooms with more than 4 people	144	1.76%

Source: CHI Nationwide Hostel Survey (April–July 2022)

Note: This includes data for 256 projects. Information for 61 projects had to be excluded due to data quality concerns. For example, in some cases the number of bedspaces in each category of sharing facilities exceeded the reported total number of bedspaces.

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Figure 4: Distribution of bed spaces by accommodation type



Source: CHI Nationwide Hostel Survey (April–July 2022)

Note: This includes data for 256 projects. Information for 61 projects had to be excluded due to data quality concerns. For example, in some cases the number of bedspaces in each category of sharing facilities exceeded the reported total number of bedspaces.

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3. Demographics and profiles of groups targeted, accepted, and excluded by hostels

Demographics

Most provision is generalist, accepting most adults from a wide range of age groups, with two notable exceptions: hostels focusing on women, and young people aged up to 25.

Table 3 shows the majority of hostels accepted both men and women (78%), with only one in twelve focusing exclusively on women (8%). A little more than a quarter (27.1%) of all the hostel projects surveyed accepted residents who qualify as legally classified minors.

Most projects (236 out of the 317) have a maximum age requirement. About one quarter of the projects (24%) focus exclusively on young people as they have a maximum age of up to 25 years of age. (Table 3).

Table 3: Demographics of hostel residents

Demographics	Statistic
Gender composition	% of total, n= 317 ^a
Women only	8%
Men only	14%
Mixed	78%
Minimum age accepted by hostel	% of total, n= 317 ^a
<18 yrs	27%
18+ yrs	73%

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Maximum age accepted by hostel	% of total, n= 317 ^a
18 to 21 yrs	7%
22 to 25 yrs	17%
26 to 54 yrs	< 1%
55+ yrs	50%
No age limit	25%

Source: CHI Nationwide Hostel Survey (April–July 2022)

^a Percents do not add to 100% due to rounding

Groups targeted, accepted and excluded

We also explored hostel admissions approaches, assessing whether projects targeted specific groups, and what their acceptance and exclusion criteria were.

The most commonly used criteria for targeting, acceptance, and exclusion were age and household composition (e.g. families with children, couples, or single individuals).

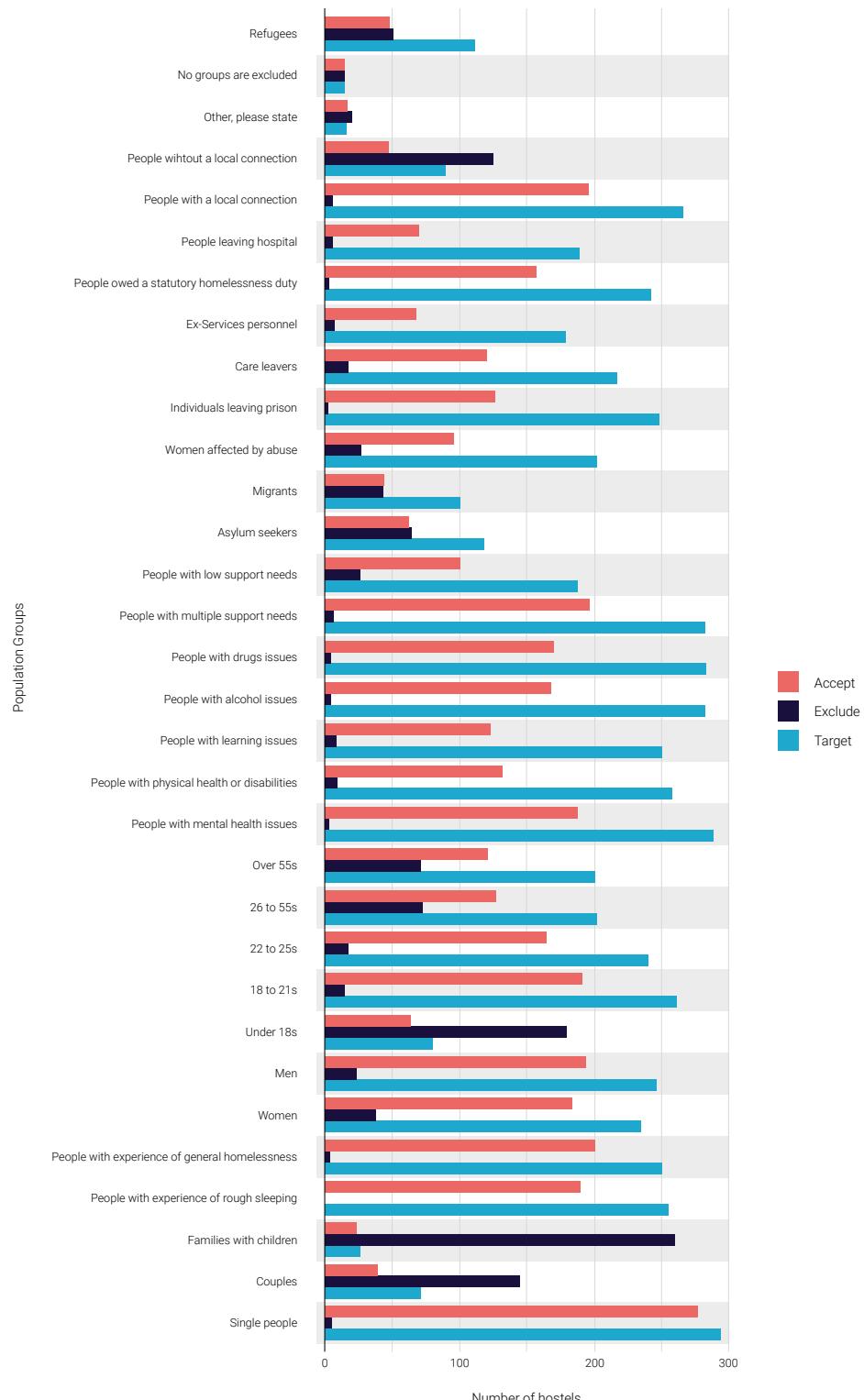
Most hostels targeted single individuals (88%) and excluded families with children (82.1%). Other groups that were often excluded are people aged under 18 years (56.7%), couples (39.2%), and people without a local connection (20%).

The data also highlights that hostels exhibit significant flexibility, often accepting individuals they are not specifically targeting (Figure 5). Groups exhibiting the highest level of disparity between targeting strategies and admission policies are:

- Individuals leaving hospital: Targeted by 22% and accepted by 60% of hostels
- Individuals leaving prison: Targeted by 40% and accepted by 78% of hostels
- Individuals with learning difficulties: Targeted by 39% and accepted by 79% of hostels
- Individuals with physical health issues or disabilities: Targeted by 42% and accepted by 81% of hostels

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Figure 5: Groups targeted, accepted, and excluded by hostels



Source: CHI Nationwide Hostel Survey (April–July 2022)

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4. Hostel support services, policies and staffing

Types of services offered

Hostels included in the survey offered a large range of services, whether in-house or through other organisations.

A wide range of support services were offered in-house, with the most common ones focusing on housing, welfare, budgeting, employment, and emotional wellbeing (psychologically informed support). The services least frequently offered in-house included immigration advice, peer support, and assistance for women affected by abuse (Figure 6).

Some services were not delivered in-house. The most common services provided by external organisations were substance use, mental and physical health support, with more than 70% of hostels bringing in external providers to deliver to residents. By contrast, family reconnection, peer support and pre-tenancy training were less often delivered by external providers (Figure 6).

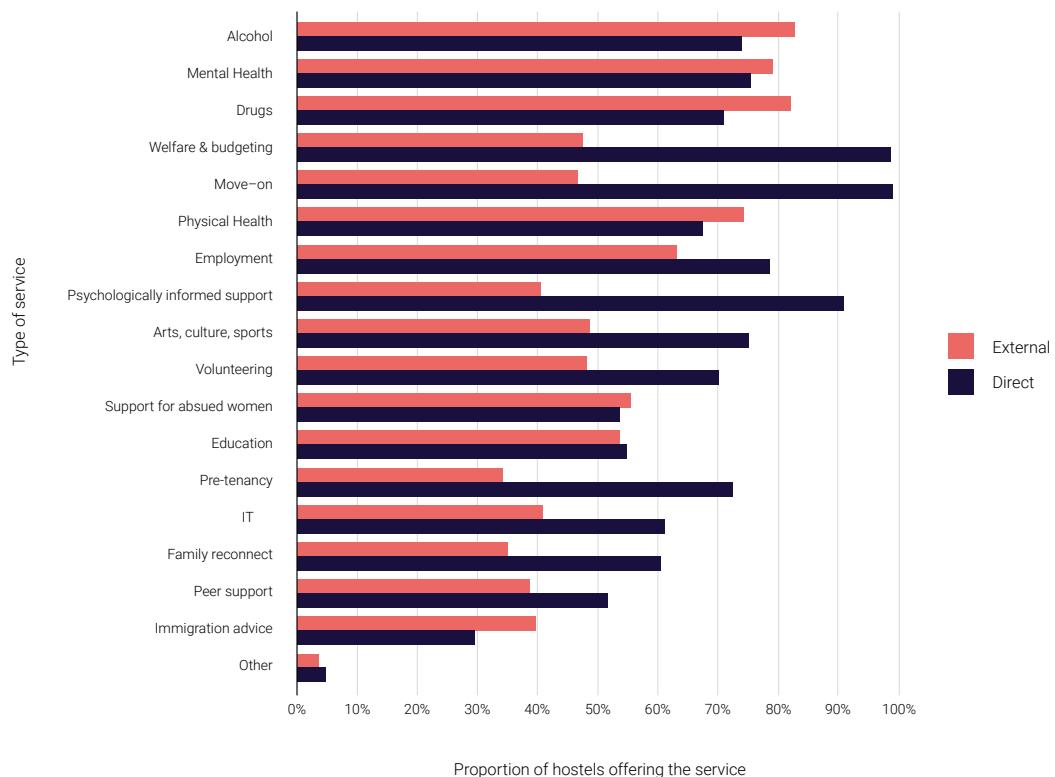
As shown in Figure 6 and summarised in Table 4, the frequency in which these are offered suggests at least two groups.

1. Hostels offering standard services, which are offered by nearly all the hostels and includes move-on, welfare and budgeting, and psychologically informed support services. About a third of hostels only offer these services.
2. Hostels with a more comprehensive offer of support. Between 67% and 80% of hostel providers included support for mental health issues, alcohol-related issues, drugs and related issues, or physical health, employment and training, Arts/Crafts/Music/Sports engagements, pre-tenancy training and support and volunteering opportunities for clients.

Other services are less common, being offered by between 50% and 65% of hostel projects. These include IT training and literacy support, family reconnection, education services, support for women affected by abuse (including domestic violence and sexual abuse).

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Figure 6: Services offered by hostel, whether directly or through other organisation



Source: CHI Nationwide Hostel Survey (April–July 2022)

Table 4: Hostel Support Services

Services	Statistic
Level of services	% of total, n= 317 ^a
Standard services offered (low level)^b	34%
Standard and additional services offered ^c	66%

Source: CHI Nationwide Hostel Survey (April–July 2022)

^a Percents do not add to 100% due to rounding

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Policies

Overall, the majority of hostels restrict the use of drugs and alcohol on the premises. Particularly, 77% of hostels in the survey do not allow any drugs and in 39% of the projects, residents are not expected to drink in the hostel. In 37% of the hostels, both drug and alcohol use is not permitted. 40% of hostels permit alcohol consumption in some parts of the building, but not drugs.

Managed consumption of either drugs and alcohol is permitted in around one in every five hostels (21%). Only five projects allowed a managed use of drugs but did not permit alcohol use.

53.4% of hostels allowed residents to keep pets while 46.6% did not. (Table 5).

Table 5: Hostel policies

Policies	Statistic
Substance use policies	% of total, n= 315 ^a
No drugs or alcohol permitted	37%
Alcohol consumption managed, no drugs	40%
Drug consumption managed, no alcohol	2%
Both alcohol and drugs managed	21%
Pets permitted	% of total, n= 305 ^a
Yes	53%
No	47%

Source: CHI Nationwide Hostel Survey (April–July 2022)

^aPercents do not add to 100% due to rounding

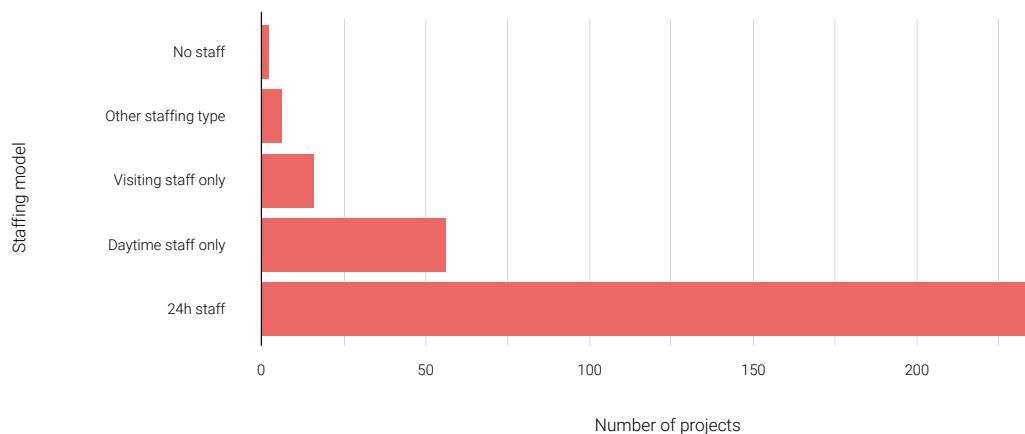
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Staffing

Almost three quarters of hostels (74%) provide some form of 24-hour staff cover (including 24 hour waking nights – single staff, 24-hour cover, more than single staff, 24-hour sleepover or 24-hour but security staff only at night). The most common type of which was 24 hour cover provided by more than one staff member (40%).

Offering only daytime staff was comparatively uncommon, as was relying on visiting staff (Figure 7).

Figure 7: Number of projects by type of staffing



Source: CHI Nationwide Hostel Survey (April–July 2022)

Staffing ratios, defined as the number of clients per member of staff, varied greatly. A significant proportion of projects (40%) maintain a low client-to-staff ratio (1–3 residents per staff), while 48% operate with a medium ratio (4–9 residents per staff) (Table 6).

Many projects employed volunteers in their hostels: about 60% of facilities reported having volunteers (Table 6). However, this did not appear to impact levels of staffing. Projects including volunteers had similar staffing ratios to those that did not involve volunteers. This suggests that volunteers might be used to complement services provided by paid staff rather than as an alternative.

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Table 6: Staffing ratios

Staffing	Statistic
Client-to-staff ratio ^b	% of total, n= 306 ^a
Low (between 1 and 3 residents per staff)	40%
Med (between 4 and 9 residents per staff)	48%
High (10 or more residents per staff)	11%
Volunteers	% of total, n= 316 ^a
Yes	60%
No	40%

Source: CHI Nationwide Hostel Survey (April–July 2022)

^a Percents do not add to 100% due to rounding

^b Client-to-staff ratio = total num. of bedspaces
total num. of staff

5. Hostel tenure and referral sources

Tenure and referral routes

Licences were by far the most common form of tenure, accounting for 84% of projects. It should be noted that tenures originating from Scotland were under-represented in the sample (Table 7).

Hostels reported that access to accommodation was obtained through a range of referral routes, with the majority of hostels accepting referrals from 2 or 3 sources. Most commonly, these referrals originated from local authority housing or homelessness services (76%), while a smaller percentage of projects allow for self-referrals (14%) (Table 7).

Table 7: Hostel tenancy and referral routes

Tenancy	Statistic
Type of tenancy offered by hostels	% of category total ^a
Licences	84%
Assured shorthold	11%
Unsecured tenancy	2%
Assured tenancy	1%
Tenancies originating in Scotland	< 1%
Other tenancies^b	4%

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Referral	Statistic
Referral routes	% of category total ^a
Direct from local authority housing/ homelessness services	76%
Local authority gateway	35%
Direct from outreach teams	25%
Direct from local authority adult care services	22%
Direct from local authority children's services	19%
Direct from health services	18%
Direct from probation services	16%
Direct from voluntary	15%
Self-referral	14%
Direct from housing association	12%
Other	8%

Source: CHI Nationwide Hostel Survey (April–July 2022)

^a Respondents had the option to choose more than one category, so the sum of percentages across all categories exceeds 100%. Each percentage represents the proportion of respondents who selected a particular category out of the total number of survey respondents. For example, for self-referral, 14% = [number of hostels that selected self-referral/ the total number of hostels in the survey (317)].

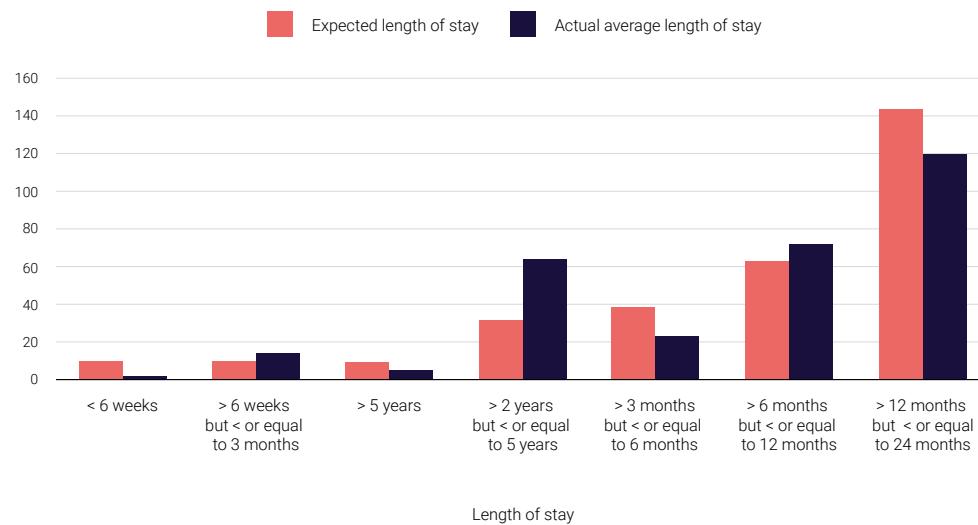
^b Other tenancies include: guest agreements, occupancy agreements, assured shorthold supported, excluded and protected licence and unprotected and protected licence.

6. Hostel residency duration and transition outcomes

Expected and average actual length of stay

The majority of hostels (46.8%) expected people to stay for between one and two years, and a fifth (20.5%) expect them to stay for six to twelve months. Relatively few hostels expected clients to stay for shorter periods of between three and six months (12.7%), or for longer periods of two to five years (10.4%). Generally, very short (less than 3 months) or very long (more than 5 years) were rare, with only 1 in 25 of the hostels expecting clients to stay for that long.

Figure 8: Length of stay by number of hostel projects [expected (n=308, actual (n=302)]



Source: CHI Nationwide Hostel Survey (April–July 2022)

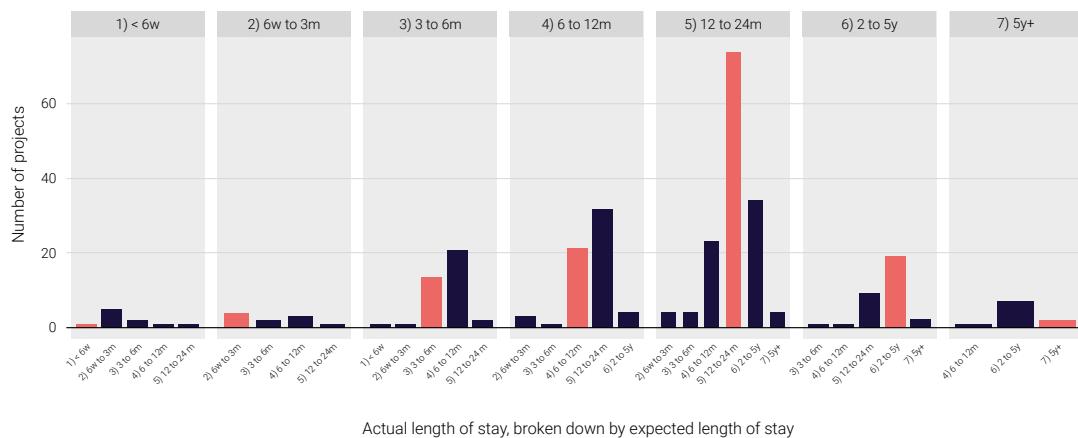
Note: 308 hostels provided responses regarding the expected length, either agreed internally or set out by their commissioner (such as the local authority) (shown by the blue bar in Figure 8), while 302 supplied data on the actual average length of stay at their hostel in 2021/2022 (shown by the orange bar).

Overall, a large fraction of residents stayed for longer than originally intended. In particular, projects where residents were expected to stay for a shorter time, we tended to see residents stay longer. Among hostels where residents were expected to stay 3 to 6 months, the most frequently reported average length of stay was 6 to 12 months (Figure 9, Graph 3). Where residents were expected to stay 6 to 12 months, the most commonly reported average length of stay was 12 to 24 months (Figure 9, Graph 4).

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The greatest consistency between expected and actual length of stay was for residents expected to stay 12 to 24 months; however, many residents in this group also stayed longer than expected. (Figure 9, Graph 5).

Figure 9: Average actual length of stay of hostel residents by expected length of stay [expected (n=308), actual (n=302)]*



Source: CHI Nationwide Hostel Survey (April–July 2022)

Note: Figure 10 shows 7 graphs. The time period listed at the top of each graph indicates the expected length of stay represented in the graph. The time periods listed at the bottom of each graph represent all possible actual average stays a hostel could report in the survey. Each graph shows the distribution of the average actual lengths of stay within the corresponding expected time period. The highlighted column indicates the number of hostels where the expected and the average actual length of stay are the same. To the right of that column, we find the proportion of hostels where, on average, residents stayed a longer time than expected, and to the left of the blue column are the proportion of hostels where, on average, residents stayed a shorter time than expected.

Move-on options

Hostels provided information on the destinations of residents 'moving on' from their hostels. This is an important outcome area as hostel projects are often explicitly geared towards supporting residents to secure long-term housing.

The majority of hostels (62%) reported that at least a third of their residents successfully transitioned to long-term housing, with comparatively few hostels (18%) reporting that only a small number of residents (under 15%) achieved this positive outcome.

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However, a substantial minority (39%) of hostels indicated that more than a fifth (21%+) of their residents experienced a 'sideways move', meaning their stay ended with transitioning to different emergency or temporary housing. This indicates that, for many, hostels are not the final step on a path to settled housing.

Finally, the data suggests that the majority of hostels (67%) see 11–20% of their residents experience a 'negative move-on', either through an unplanned departure ('abandonment') or being required to leave (eviction).

During the 2021/22 financial year, an average of 6.8% of residents left the project voluntarily and 9.4% were evicted. However, the median (meaning that 50% of hostels had a higher number and 50% a lower number) was 2% for abandonments and 5% for evictions. The averages are higher than the medians because a few places had much higher rates of both abandonments and eviction.

Table 8: Transition outcomes

Move-on outcomes, 2021/ 2022	Statistic
Negative movement (evicted from or abandon hostel)	% of total, n= 317 ^a
≤ 10% of residents	6%
11%–20% of residents	67%
21% + of residents	28%
Sideways movement (move to emergency or temporary housing)	% of total, n= 317 ^a
≤ 10% of residents	34%
11%–20% of residents	26%
21% + of residents	39%
Positive movement (move to long-term housing)	% of total, n= 317 ^a
≤ 15% of residents	18%
16%–30% of residents	21%
31% + of residents	62%

Source: CHI Nationwide Hostel Survey (April–July 2022)

^a Percents do not add to 100% due to rounding

7. Funding and costs

Hostel funding

The survey found more than 4 in every 5 hostel projects were funded by Housing Benefits and/or Universal Credit. Nearly 60% are funded by both Housing related support and rent and service charges paid by residents. A little above a quarter of surveyed hostels are funded by fundraising and donations (27%).

For Housing Benefit/Universal Credit purposes, among those who responded, the majority (63%) were classified as Specified/Exempt accommodation, 22% were classified as local authority-funded hostels and 10.2% were classified as General needs social housing. Moreover, 2% of the hostels were classified as ineligible for Housing Benefit or Universal Credit housing element (Table 9).

Table 9: Hostel funding

Hostel Funding	Statistic
Funding source	% of total, n= 294a,b
Housing benefit/Universal credit	86%
Housing-related support(formerly supporting people)	64%
Fundraising and donations	29%
Charitable grants	10%
Children's services	19%
Adult social care	7%
Corporates/businesses	2%
Health (e.g. CCGs, NHS Trusts)	2%
Criminal Justice	1%
Rent and service charges paid by residents (excluding Housing Benefit/Universal Credit)	1.2%
Other	12%

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Source: CHI Nationwide Hostel Survey (April–July 2022)

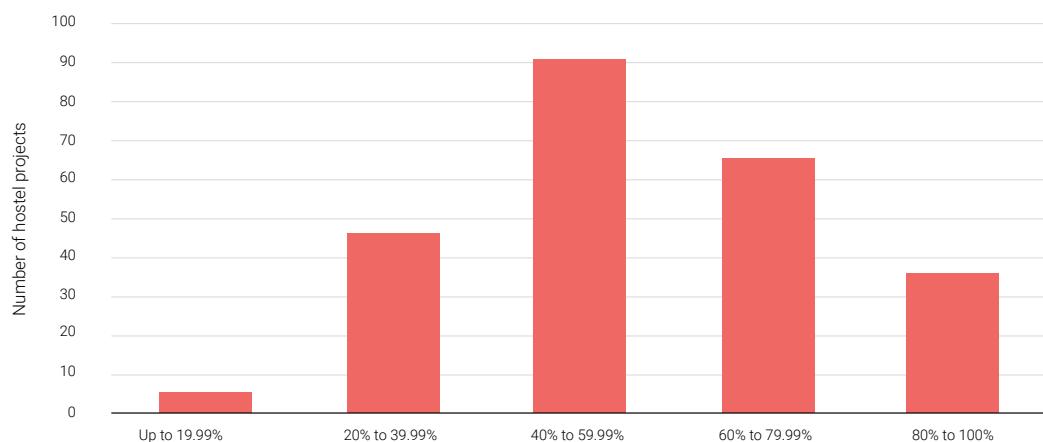
^a Percents do not add to 100% due to rounding

^b Respondents had the option to choose more than one category, so the sum of percentages across all categories could exceed 100%. Each percentage represents the proportion of respondents who selected a particular category out of the total number of survey respondents. For example, for criminal justice, 1% = [number of hostels that selected criminal justice/ the total number of hostels in the survey (314)].

^c Other includes: General needs social housing, General needs private rented accommodation, Leased or nightly paid temporary accommodation, and Bed and Breakfast.

The majority of projects (38%) have rental incomes that covered between 40% and 59.99% of the total annual cost. In about a quarter (27%), rental income covers between 60% and 79.99%. (Figure 10)

Figure 10: Share of total annual project cost covered by rental income



Source: CHI Nationwide Hostel Survey (April–July 2022)

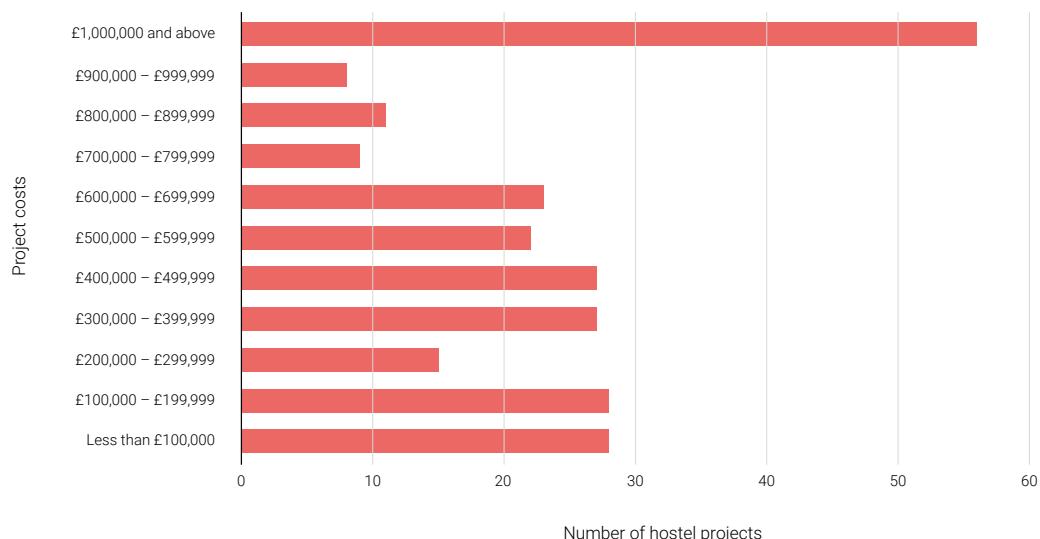
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Annual costs

A total of 254 projects reported the annual cost of hostel projects incurred during the 2021/22 financial year and it represents 80.13% of the overall survey sample.

The survey revealed significant variation in the total annual costs for the fiscal year 2021–2022, ranging from less than £100,000 to £1 million and above. 22% of hostels reported costs of £1 million and above, representing the highest proportion (Figure 11). The rest seem to be fairly evenly distributed, with about 1 in 10 hostels falling in each of the £100,000 brackets up to £500,000.

Figure 11: Total annual cost of projects for fiscal year 2021–2022



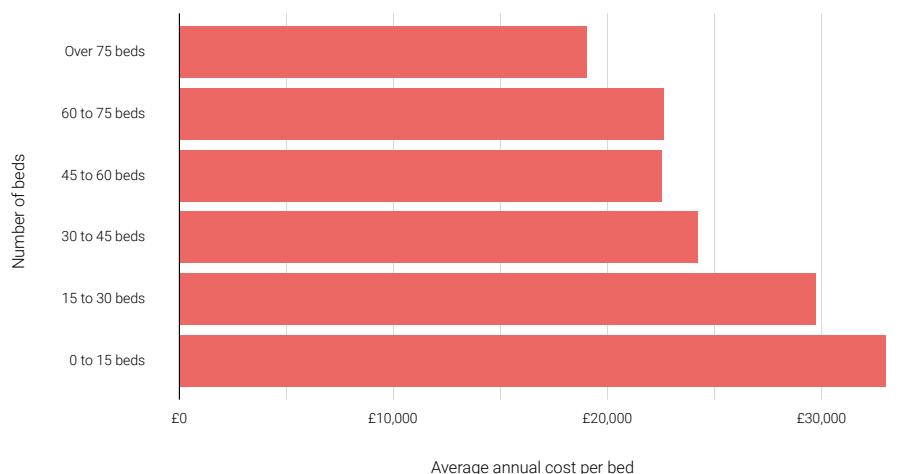
Source: CHI Nationwide Hostel Survey (April–July 2022)

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Cost per bed

On average, the yearly cost for a hostel bed was £27,785, with half of the projects having costs per bed ranging from £18,000 to £33,000. Larger projects appeared to benefit from economies of scale, resulting in lower costs compared to smaller ones. Hostels with fewer than 30 bedspaces were more costly per bed space than compared to the largest hostels with 75 beds or more (Figure 12).

Figure 12: Average annual cost/bed by hostel size



Source: CHI Nationwide Hostel Survey (April–July 2022)

Note: This includes information for 254 hostel projects that provided both data on the total budget of the hostel and the number of beds.

8. Ownership and Governance of Hostels

Ownership, management and oversight

Respondents provided information on what kinds of organisations owned the buildings in which hostels projects were being delivered, who was responsible for the management of the hostel itself, and how each project was overseen and regulated.

Most hostels (74%) were owned by registered housing associations, with half managed by a charity other than the owning association. Only 29% of projects were also managed by the Registered Housing Association who owned the property. Regulatory oversight for hostels was most often undertaken by the local authority (Table 10), or by the Regulator for Social Housing.

Table 10: Hostel ownership and governance

Hostel ownership and governance	Statistic
Ownership of hostel projects	% of total, n= 303 ^a
RHA^b that is not the support provider	47%
RHA that is the support provider	27%
A charity other than a RHA	12%
Local authority	11%
Private landlord	2%
Other	2%

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Management of hostel projects	% of total, n= 303 ^a
A charity other than the RHA that owns the project	54%
RHA which owns the project	29%
Local Authority	3%
Private Sector	<1%
Prison and Probation Service	<1%
Other	14%
Regulators of hostel projects	% of total, n= 303 ^a
Local authority inspection and audit	50%
Regulator of Social Housing (RSH) inspection and audit	17%
Care Quality Commission (CQC) inspection and audit	1%
Inspection and audit by the owning Housing Association	15%
Internal Inspection and audit	12%
Other	3%
None of the above	3%

Source: CHI Nationwide Hostel Survey (April–July 2022)

^a Percents do not add to 100% due to rounding

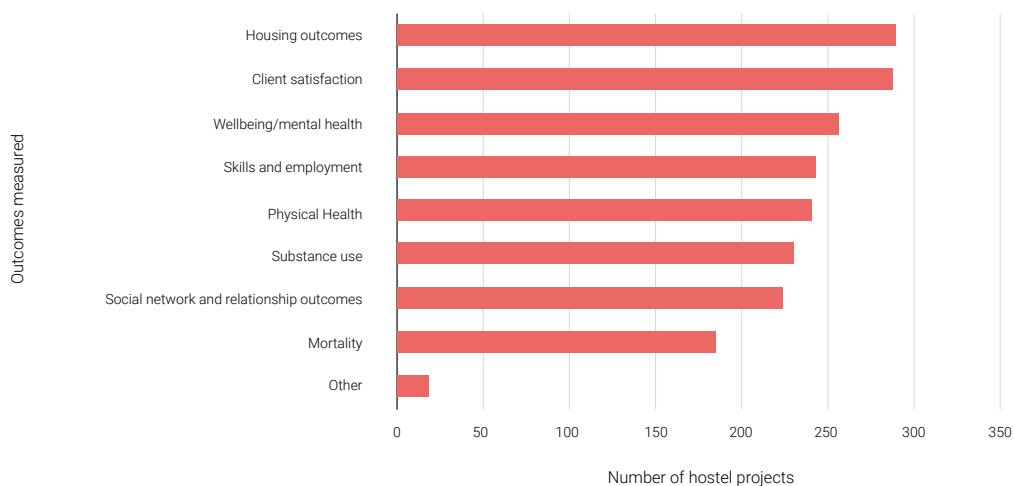
^b RHA is registered housing association

9. Data collected

Outcome measures data

Hostels collected similar data from their residents, with housing-related performance indicators unsurprisingly the most commonly assessed measures (92%). Client satisfaction (91%), and wellbeing and mental health indicators (81%) were also frequently recorded (Figure 13). A little more than two thirds of hostels measure skills and employment (77%) and physical health (76%). Substance use (73%) and social networks and relationships (71%) are also measured by a slightly smaller number of hostels.

Figure 13: Resident outcome measures by the number of projects



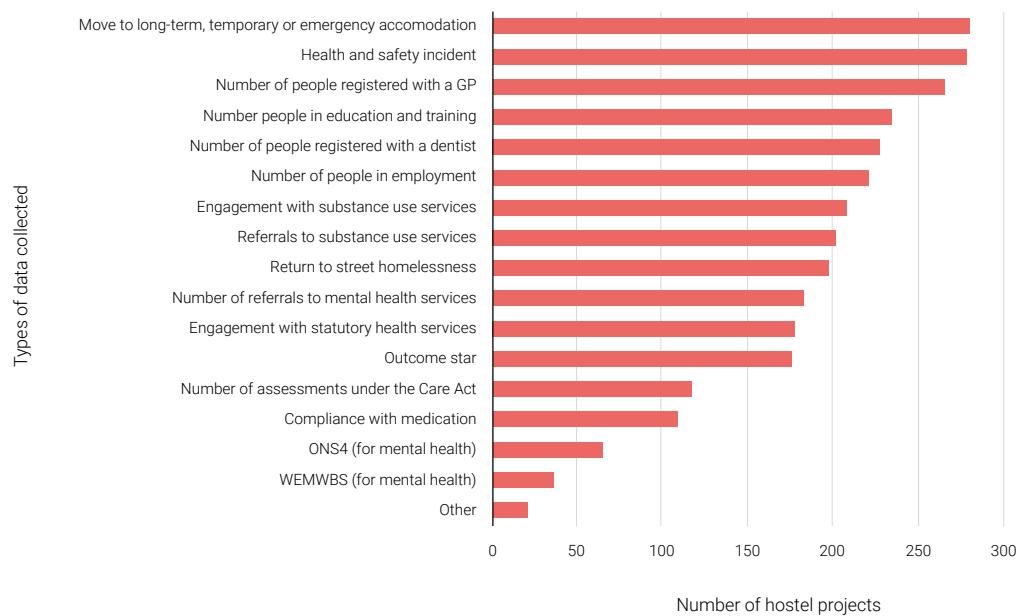
Source: CHI Nationwide Hostel Survey (April–July 2022)

Administrative and management data collection

Hostels reported collecting a wide range of other data on residents. (Figure 14). As with outcome measures, projects were found to broadly collect similar data. The most commonly collected information included movements to long-term, temporary, or emergency accommodation, as well as evictions (88.3%), health and safety incidents (88%), and the count of individuals registered with a GP (83.9%) (Figure 14).

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Figure 14: Resident management data by hostels by the number of projects



Source: CHI Nationwide Hostel Survey (April–July 2022)

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Conclusions

Using the analysis above, we propose some typical characteristics of hostel provision. These provide a 'base type' upon which a more sophisticated typology can be built through future research.

- Hostels could be typified as primarily **generalist accommodation** with **fairly open acceptance criteria**, noting there are clearly defined sub-categories targeting women and young people exclusively. A typology should seek to better understand how different hostels work with individuals with specific needs (e.g. learning disabilities), especially those that don't explicitly target these groups but accept them in practice. This should explore to what extent such hostels constitute distinct sub-types, or if this activity is driven by a need for generalist provision to backfill in the absence of more appropriate specialist provision.
- Hostels could be typified as providing a **'core service' of move-on support, welfare and budgeting advice, and emotional support**. As most offer some level of specialist support beyond this, a typology should seek to systematically assess variations in additional services offered and how these relate both to populations served and outcomes.
- Hostels could be typified as generally encompassing **fairly small sites providing self-contained accommodation of 10–20 bed spaces, often with private access to facilities**. A typology could helpfully seek to refine how both very small and very large hostels intersect with other categories of accommodation-based services, such as smaller and more intensively supported housing projects.
- Hostels are typified by a **24-hour staffing model**, and a more sophisticated typology should explore how variations in staffing support interact with populations served, services provided, outcomes, and costs.
- Hostels could also be defined in terms of **target outcome** and **typical duration of stay**, with most hostels aiming to provide **temporary housing of 6 months to 2 years with the goal of moving on to settled housing**. Further work on a typology should seek to better understand the variations in approaches to move-on (e.g. duration of stay for different cohorts and support services offered) and outcomes, and comparisons with other accommodation types which seek similar outcomes.

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- Finally, in terms of **cost and funding structure**, hostels can be understood as costing typically **around £27,000 per bed space per year, primarily funded by Housing Benefit**. A typology could seek to explore further the **relationship between bed space cost, size of project, and outcomes** to better assess the value for money of different types of provision. It could also seek to compare the cost of hostel-type beds to other forms of accommodation-based services, such as statutory Temporary Accommodation or supported housing.



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Alton Estate Regeneration
Hybrid Application

HEALTH IMPACT ASSESSMENT

Barton Willmore
May 2019



 **REDROW**

Alton Estate, Roehampton

Health Impact Assessment

Prepared on behalf of Redrow Homes Ltd

Project Ref:	26063/A5/HIA				
Status:	Draft	Final draft for client review	Final draft for legal review	Revised final draft	Final
Issue/Rev:	01	02	03	04	05
Date:	February 2019	March 2019	March 2019	April 2019	May 2019
Prepared by:	JO & NP	JO	JO	JO	JO
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APPENDICES

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Appendix 2: Scoping Letter to LBW

Appendix 3: HUDU Healthy Urban Planning Checklist

Appendix 4: Public Health England: London Borough of Wandsworth Health Profile 2018

Appendix 5: Primary Healthcare Provision

Appendix 6: The Alton and Putney Vale (Roehampton) Health profile

EXECUTIVE SUMMARY

Introduction

The importance of healthy communities is a theme running through National, London and local planning policy. The requirement for a Health Impact Assessment (HIA) to accompany the planning application for the proposed redevelopment of part of the Alton Estate, Roehampton (the 'Site') comes from the London Plan¹. The Site is located within the area of Alton and Putney Vale of the London Borough of Wandsworth (LBW).

The Development

The proposed development comprises the demolition of existing buildings and erection of up to 1,103 dwellings, new commercial and community floorspace, new and replacement play facilities and associated hard and soft landscaping, parking, servicing, new public realm, access and other associated works (the 'Development'). The Development seeks to regenerate one of the key areas identified within LBW's Aspirations Programme that was launched in 2013.

The Assessment

The assessment has been undertaken using the London Health Urban Development Unit (HUDU) Healthy Urban Planning Checklist² and the HUDU Rapid HIA Tool³. The assessment has reviewed the potential health effects of the proposed development and provided recommendations to seek to maximise health gains and remove or mitigate potential adverse impacts on health.

The existing health conditions of Alton Estate and the surrounding areas of Alton and Putney Vale have been identified to be amongst the 20% most deprived neighbourhoods in England. The average life expectancy for both men and women living in Alton and Putney Vale are lower than the LBW's average. LBW launched its Aspirations Programme in 2013 which targets two key areas that are undergoing a programme of regeneration to create more homes, help people to work and encourage healthy lifestyles.

The assessment provided in Chapter 5 of the HIA has assessed the performance of the

¹ Greater London Authority, (2016) *The London Plan: The Spatial Development Strategy for London Consolidated with Alterations Since 2011*

² London Health Urban Development Unit (April 2017) *Healthy Urban Planning Checklist Third Edition*.

³ London Health Urban Development Unit (April 2017) *Rapid Health Impact Assessment Tool Third Edition*.

Development against 11 key health themes identified within the HUDU Health Urban Planning Checklist. The assessment identified that the regeneration of Alton Estate will have positive health effects for the following 10 of 11 key health themes:

- Housing quality and design;
- Access to healthcare services and other social infrastructure;
- Access to open space and nature;
- Air quality, noise and neighboured amenity;
- Accessibility and active travel;
- Crime reduction and community safety;
- Access to work and training;
- Social cohesion and lifetime neighbourhoods;
- Minimising the use of resources; and
- Climate change.

Access to healthy food was the only key health theme identified in the assessment to have a neutral/uncertain health effect as a result of the Development. The retail floorspace to be provided on the Site is currently flexible in the uses proposed and could potentially provide fast food takeaways as the future occupiers of this space is uncertain. However, the Applicant is committed to avoid contributing towards an over-concentration of hot food takeaways on the Site.

Discussion

As part of the design of the Development particular attention has been given to creating a balanced, mixed-use community which meets local housing needs and provides employment opportunities. The Development seeks to maintain the current uses on Site by re-providing, yet enhancing the housing, employment, community and open space uses to provide a new focal point for the wider communities of Alton West, Alton East and Roehampton. In addition, the Development promotes active and sustainable travel, including attractive and safe cycling and pedestrian facilities that connect to the wider area. The Development also includes the enhancement of the large area of open space currently within the Site, and the design team have incorporated multi-use open space throughout multi-use open space throughout the public and private areas which will provide a range of beneficial health effects. Therefore, it is considered that the Development will retain the character and culture of the existing Site, whilst enhancing the opportunities to create a healthy neighbourhood which provides connections to the existing community, leisure, education and employment facilities.

Mitigation or Enhancement Action

Table 0 below sets out potential mitigation and enhancements measures that have been identified within the HIA:

Table 0: Recommended mitigation or enhancement action for the Development

Health Theme	Recommended Mitigation or Enhancement Action
Housing quality and design	<ul style="list-style-type: none"> No mitigation or enhancement measures considered necessary.
Access to healthcare services and other social infrastructure	<ul style="list-style-type: none"> A Management Plan to be secured by condition to ensure effective management and maintenance of the new open space and public realm during the operational phase of the Development.
Access to open space and nature	<ul style="list-style-type: none"> A Management Plan to be secured by condition to ensure effective management and maintenance of the new open space and public realm during the operational phase of the Development.
Air quality, noise and neighboured amenity	<ul style="list-style-type: none"> Construction Environment Management Plan to be secured by condition to ensure effective control of noise and air quality emissions during the construction stage; Travel Plans to be prepared to show other sustainable ways of travelling to minimise air pollution; and Planning conditions to be attached to the permission to ensure plant such as heating and cooling units operate to acceptable standards, on completion of the Development.
Accessibility and active travel	<ul style="list-style-type: none"> S278 agreements for future highway works during the course of the Development; S106 agreements for financial contributions to the capacity of the local bus network; In relation to encouraging active travel, The Travel Plans or Residents' Welcome Pack could also include a section on safe walking routes to local parks and green spaces to encourage physical and mental wellbeing; Monitoring of the Travel Plans to ensure its effectiveness and where measures are not proving successful, review of the proposals.
Crime reduction and community safety	<ul style="list-style-type: none"> Continued public consultation and engagement during the future Reserved Matters applications when the development process continues forward.
Access to healthy food	<ul style="list-style-type: none"> Consider committing some of the proposed commercial floorspace for social enterprises; and When selecting tenants for commercial floorspace, consider proposed use and potential for adverse effects on health.
Access to work and training	<ul style="list-style-type: none"> Provision of S106 financial obligation towards access to work and training and potential Workmatch opportunities.
Social cohesion and lifetime neighbourhoods	<ul style="list-style-type: none"> No mitigation or enhancement measures considered necessary.
Minimising the use of resources and	<ul style="list-style-type: none"> No mitigation or enhancement measures considered necessary.
Climate change.	<ul style="list-style-type: none"> A Management Plan to be secured via planning condition to ensure the delivery of key mitigation and enhancement measures. Interpretation Boards to increase awareness of biodiversity across the Site.
	<ul style="list-style-type: none">

Conclusion

It is considered that, in view of the mitigation and enhancements actions, the redevelopment

of Alton Estate will generate a positive change in the deprivation levels of Alton and Putney Vale, and ultimately LBW. This positive change will help deliver the strategic objectives that are the golden thread for the regeneration of the Alton Estate that are identified in the Roehampton SPD.

1 INTRODUCTION

- 1.1 This Health Impact Assessment (HIA) has been prepared on behalf of Redrow Homes Ltd (the 'Applicant') to accompany a hybrid planning application to the London Borough of Wandsworth (LBW) for the residential-led mixed use regeneration of the Alton Estate (the 'Development') in Roehampton, London, SW15, 4PS (the 'Site').
- 1.2 The HIA seeks to identify and assess the potential health effects of the Development and provide recommendations that maximise health gains and remove or mitigate potential adverse impacts on health.
- 1.3 The structure of the HIA is set out in the table below.

Chapter	Content
Executive Summary	Summary of the HIA.
Chapter 1	Describes the site context and description and provides the description of Development.
Chapter 2	Provides the planning policy context at national, regional and local level and the requirement for a HIA.
Chapter 3	Outlines the assessment methodology.
Chapter 4	Describes the baseline conditions of health within LBW, Roehampton and Putney Heath and Alton and Putney Vale.
Chapter 5	Rapid Health Impact Assessment.
Chapter 6	Outline monitoring report.
Chapter 7	Provides the conclusions of the HIA and sets out recommendations to enhance the beneficial effects and reduce any potential adverse health effects identified.

Site Context and Description

- 1.4 The Site covers a total area of approximately 12.5 hectares (ha). The Site is located within the administrative boundary of the London Borough of Wandsworth (LBW) and falls within the Roehampton and Putney Heath ward (see Site Location Plan at Appendix 1). An existing children's play area is situated within Downshire Field with other play facilities at Alton Activity Centre and Hersham Close. There are 288 existing dwellings within the Site; 158 of these are existing Council tenanted homes and 130 of these are leasehold and freehold properties.
- 1.5 There are a range of retail services on the Site, including individual shops, cafes, betting shops, professional services (opticians), a laundrette, fast food takeaways, plus a satellite

housing office for LBW and the MET Police. There are also various community facilities on the Site, including a library, nursery school, youth services, elderly residents club room and doctor surgeries. Roehampton Village is located to the north-east of the Site on the opposite side of Roehampton Lane. Roehampton High Street contains a range of small- scale local retailers and services.

- 1.6 Downshire Field is a large area of open space located towards the western side of the Site. An existing children's play area is situated within Downshire Field with other play facilities at the Alton Activity Centre and Hersham Close.
- 1.7 The main vehicular access to the Alton West Estate is via the junction between Danebury Avenue and Roehampton Lane. Other secondary access points are located at Kingsclere Close and from Alton East via Holybourne Avenue.

The Development

- 1.8 The planning application for the Development is formed of a part outline and part detailed (hybrid planning application) planning permission for the following formal description of the Development:

*"(a) Phased demolition of all existing buildings and structures (except Alton Activity Centre community building); and
(b) Mixed-use phased development ranging from 1-9 storeys above ground level comprising up to 1,103 residential and up to 9,572 sqm (GIA) of non-residential uses comprising new and replacement community facilities (including enhanced library and healthcare facilities, youth facilities, community hall, children's nursery & children's centre) (Class D1); flexible commercial floorspace (comprising retail (Class A1), financial and professional services (Class A2), café / restaurants (Class A3), drinking establishments (Class A4), hot-food takeaways (Class A5), business (Class B1) and community uses (Class D1)); landscaping; removal and replacement of trees; public realm improvements; access improvements; relocation of bus turnaround area; improvements to children's play facilities; provision of energy centre; car & cycle parking; and other highway works incidental to the development. All matters reserved except for Blocks A, K, M, N, O, Q, Portswood Place Nursery and Community Centre and highway/landscape/public realm improvements."*
- 1.9 The detailed element of the Site is 11.4ha and will comprise:
 - 654 residential units (Class C3), 1,965 habitable rooms and 63,824 sqm (GIA) of residential floorspace (including ancillary floorspace);
 - 498 private tenure homes & 1,382 habitable rooms;

- 111 social rent tenure affordable homes, 409 habitable rooms and 11,174 sqm (GIA) floorspace;
- 45 intermediate tenure affordable homes, 174 habitable rooms and 4,007 sqm (GIA) floorspace;
- 1,809 sqm (GIA) of flexible commercial floorspace (Classes A1-A5, B1 and D1);
- 5,527 sqm (GIA) of dedicated community floorspace (Class D1);
- 643 sqm (GIA) of dedicated office floorspace (Class B1); and
- Maximum 9 storeys height.

1.10 Whilst the outline element has an area of 1.8ha and comprises of:

- Up to 449 residential units (Class C3), 1,321 habitable rooms and 39,679 sqm (GIA) of residential floorspace (including ancillary floorspace);
- Up to 349 private tenure homes and 998 habitable rooms;
- Up to 77 social rent tenure affordable homes, 261 habitable rooms and 7,350 sqm (GIA) of floorspace;
- Up to 23 intermediate tenure homes, 62 habitable rooms and 1,495 sqm;
- Up to 1,593 sqm (GIA) of flexible employment floorspace (Classes A1-A5, B1 & D1); and
- Maximum 8 storeys height.

1.11 In summary, across the Site, the Development will provide:

- Up to 1,103 residential units 3,286 habitable rooms and 103,594 sqm (GIA) of residential floorspace (inc. ancillary floorspace);
- 256 affordable homes (188 social rent & 68 intermediate);
- Up to 3,402 sqm (GIA) of flexible commercial floorspace (Classes A1-A5, B1 and D1);
- 5,527 sqm (GIA) of dedicated community floorspace (Classes D1);
- 643 sqm (GIA) of office floorspace (Class B1); and
- Maximum 9 storeys height.

2 PLANNING POLICY CONTEXT

Requirement for HIA

2.1 The importance of healthy communities is a theme running through National, London and local planning policy. The requirement for HIA in this case specifically comes from the London Plan and local policy. A summary of the relevant planning policy relating to health is set out below.

National Planning Policy Framework (NPPF)⁴

2.2 The revised NPPF published in February 2019 identifies the key principles in relation to health that local planning authorities should consider. In particular Chapter 8 of the NPPF 'Promoting healthy and safe communities' states that decisions should aim to achieve the following key features to a healthy and safe community:

1. *"Promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use development, strong neighbourhood centre, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;*
2. *Are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and*
3. *Enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling."*

The Adopted London Plan⁵

2.3 Policy 3.2 of the London Plan states that the impacts of major development proposals on the health and wellbeing of communities should be considered, for example through the use of HIA. For the purposes of HIA, a 'major development' comprises '10 or more residential units (or a site of 0.5 ha or more), or 1,000 square metres or more of non-residential floorspace (or a site area of 1.0 ha or more)'. The proposed development exceeds these thresholds.

⁴ CLG (February 2019) *National Planning Policy Framework*

⁵ Greater London Authority (2016); *The London Plan: The Spatial Development Strategy for London Consolidated with Alterations Since 2011*

2.4 Policy 3.6 of the London Plan identifies the requirement for the provision of play and informal recreation within London as well as the need for London Boroughs to undertake audits of existing play and informal recreation provision and assessment of needs in their areas. The 'Shaping Neighbourhoods Play and Informal Recreation' Supplementary Planning Guidance (September 2012)⁶ provides more detailed guidance to assist in the implementation of this policy into forthcoming developments.

2.5 Policy 3.13 of the London Plan requires the protection and enhancement of social infrastructure and the provision of social infrastructure to meet the needs of its growing and diverse population. The policy highlights that all facilities should be accessible to all sections of the community and be located within easy reach by walking, cycling and public transport. The 'Social Infrastructure' Supplementary Planning Guidance (May 2015)⁷ provides more detailed guidance to assist in the implementation of this policy into forthcoming developments.

[The Draft London Plan \(2017\)⁸](#)

2.6 Whilst still in draft, the Draft London Plan is a material planning consideration. The Draft London Plan highlights the importance in assessing development proposals on all aspects of health and wellbeing to improve Londoners' health and reduce health inequalities through the use of HIA. The Draft London Plan states that the environment to which Londoners live in largely determines the mental and physical health of the public. There are areas within London that are more deprived than others, and this is reflected in the life expectancies that differ across London which is acknowledged within the Draft London Plan.

2.7 Policy GG3 'Creating a healthy city' addresses how planning and development must promote healthy lifestyles and hence reduce health inequalities. This policy identifies the use of HIA to assess the potential effects from proposed developments on the health and wellbeing of communities and identify mitigation measures to reduce health inequalities.

[LBW Local Plan – Core Strategy \(March 2016\)⁹](#)

2.8 Policy PL 1 'Attractive and distinctive neighbourhoods and regeneration initiatives' of the Core Strategy highlights that LBW will address deprivation and health inequalities through

⁶ Greater London Authority (2012); *The London Plan 2011 Implementation Framework; Supplementary Planning Guidance; Shaping Neighbourhoods: Play and Informal Recreation*.

⁷ Greater London Authority (2015); *The London Plan 2011 Implementation Framework; Supplementary Planning Guidance; Social Infrastructure*.

⁸ Greater London Authority (2017) *The draft London Plan*

⁹ London Borough of Wandsworth (March 2016) *Core Strategy*

regeneration initiatives in parts of Battersea, Tooting and Roehampton.

- 2.9 Policy PL 4 'Open space and natural environment' recognises the importance of protecting and improving public and private open space and improving the access to these areas to promote health environments within the communities.
- 2.10 Policy IS 6 'Community services and the provision of infrastructure' supports the provision and improvement of facilities for community services, including education, healthcare and social services. Furthermore, this policy supports the provision of infrastructure and improvements to public transport and facilities for walking and cycling to encourage healthy lifestyles.

[**LBW Local Plan - Development Management Policies Document \(DMPD\) \(March 2016\)**](#)¹⁰

- 2.11 The LBW Local Plan, which sets out the strategic policies for the borough, was adopted in March 2016 and health is a core theme running through the plan. Policy DMS 1 'General development principles – Sustainable urban design and the quality of the environment' sets out the criteria for developments to comply with to achieve planning permission. Policy DMS 1 also states that "*the requirement of a Health Impact Assessment will be determined at pre-application stage.*"

¹⁰ London Borough of Wandsworth (March 2016) *Development Management Policies Document*

3 ASSESSMENT METHODOLOGY

3.1 As mentioned within Chapter 2, the requirement of a HIA for the redevelopment of Alton Estate is stated within the draft London Plan and LBW's local plan. In addition to the policy requirements, *The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)* ("2017 EIA Regulations") that was published in May 2017 (subsequently updated in October 2018) requires the consideration of human health within the EIA. An Environmental Statement has been prepared for the redevelopment of Alton Estate to identify any potential significant effects as a result of the proposed development. This HIA forms an appendix to the Population and Human Health Chapter which assesses socio-economic and wider health effects, as agreed with LBW through the EIA Scoping process.

3.2 The scope of this HIA for the redevelopment of Alton Estate, has been agreed with the Public Health Lead for Richmond and Wandsworth Councils at LBW (letter dated 6th June 2019 and attached at Appendix 2).

Baseline Conditions

3.3 This HIA includes a high-level assessment of the baseline conditions within LBW and specifically the wards of Roehampton and Putney Heath.

3.4 Chapter 4 considers the baseline conditions at borough level, ward level and the regeneration area of Alton. Public Health England (PHE) produce an annual report on the health profile for each local authority, which provides borough wide information on health levels. Utilising the information from PHE latest report for LBW (July 2018) (Appendix 4), Chapter 4 provides a summary of the latest health profile at borough level.

3.5 The baseline conditions of health are also identified for the local area using the English Indices of Deprivation (EID) at small areas (or neighbourhoods) which are also known as lower super output areas (LSOAs) which on average contain around 1,500 people. There are 32,844 of these neighbourhoods across England as a whole. The Site is located within three LSOA's named 'Wandsworth 013A', 'Wandsworth 013B' and 'Wandsworth 023A'. The EID are compared against LBW's and England's average.

3.6 The baseline conditions also consider the health profile at ward level. LBW launched a knowledge management system¹¹ in the form of a website named 'DataWand' in April 2018¹²

¹¹ A knowledge management system is the process of creating, sharing, using and managing the knowledge and information of an organisation.

¹² LBW DataWand website: <https://www.datawand.info/>, accessed 27th February 2019.

that is intended to host local data about the borough and is accessible to all. Chapter 4 provides information on the health profile of Roehampton and Putney Heath ward by using information provided on DataWand. To identify the adult and child health of the Roehampton and Putney Heath ward, the reports produced by Public Health England for Local Health¹³ has been summarised within Chapter 4.

3.7 In addition, LBW have also published 'The Alton and Putney Vale (Roehampton) Health profile' in 2018¹⁴ which has been undertaken to support the regeneration area of Alton. The Site is one of two key aspiration areas in LBW which was identified within its Aspirations Programme launched in 2013. Therefore, Chapter 4 provides a summary of the health profile provided for the Alton and Putney Vale and the full report is provided at Appendix 5.

Facilities Audit

3.8 An audit of existing healthcare infrastructure and the capacity that is available within the existing healthcare facilities within the surrounding area of the Site is provided within Chapter 4. General Practitioners (GP) practices in the proximity of the Site are shown at Appendix 5. The levels of under- or over-provision of GPs are determined through reference to the National Health Service (NHS) General and Personal Medical Services statistics¹⁵ which provide total patient list size for individual GP practices and the number of full time equivalent (FTE) GPs at each practice as at March 2018. The location data relating to each Practice has been sourced from NHS Business Services¹⁶. Assessment has been conducted by comparing the GP to patient ratios of local practices with the Healthy Urban Development Unit (HUDU) standard of 1 GP to 1,800 patients to determine under- or over-capacity.

3.9 The Site is located adjacent to the Roehampton University, students have access to their own free medical centre with which they can register. Out of term, the students can also attend the 'parent' Practice, the Putneymead Group Medical Practice.

3.10 The number of dental practices within proximity of the Site is also investigated and those practices accepting new patients identified via a targeted telephone survey. It is not possible to determine the precise number of patient places available as no central census of dentists is conducted and no definitive ratio of patients per dentist exists. However, analysis has been drawn as to availability of new patient registrations for both private and NHS patients, based

¹³ Public Health England: Local Health website:

http://www.localhealth.org.uk/#z=507196,190798,46522,28288;sly=wd16_DR;v=map13;l=en;sid=541, accessed 27th March 2019.

¹⁴ LBW (2018) *The Alton and Putney Vale (Roehampton) Health profile*

¹⁵ NHS, General and Personal Medical Services statistics March 2018

¹⁶ NHS, Business Services Statistics March 2018

on survey results. Dental practices are also illustrated in Appendix 2. They are all situated within Roehampton and located within the 1km of the Site.

3.11 An audit of educational and community facilities and open space provision is provided within Chapter 6 'Population and Human Health' of the Environmental Statement (ES) submitted in support of the planning application. Chapter 6 of the ES has also assessed the effect the Development will have upon the existing educational facilities. Therefore, this HIA draws upon the findings provided within Chapter 6 of the ES and considers the effects identified in terms of wider health effects.

Health Impact Assessment

3.12 The assessment has been based on the London HUDU Healthy Urban Planning Checklist¹⁷ which has been used to screen the health impacts of the Development. The HUDU Rapid HIA Tool¹⁸ has then been used to undertake the main assessment of health effects.

3.13 A preliminary assessment was undertaken during preparation of the planning application documents. The assessment was then finalised upon receipt of the final Design and Access Statement submitted in support of the planning application.

HUDU Healthy Urban Planning Checklist

3.14 The HUDU Healthy Urban Planning Checklist aims to promote healthy urban planning by ensuring that the health and wellbeing implications of local plans and major planning applications are consistently taken into account. The checklist was originally created by with input from the six London Olympic and Paralympic Host Boroughs (Barking and Dagenham, Greenwich, Hackney, Newham, Tower Hamlets and Waltham Forest), the local NHS, the NHS London HUDU, Greater London Authority and Groundwork London. The latest version of the HUDU Healthy Urban Planning Checklist was updated in April 2017 to be consistent with the adopted London Plan (March 2016). In this assessment, the checklist has been used as a desktop assessment to screen the health impacts of the Development.

3.15 The HUDU checklist is divided into four main themes:

1. Healthy housing;
2. Active travel;

¹⁷ London Health Urban Development Unit (April 2017) *Healthy Urban Planning Checklist Third Edition*

¹⁸ London Health Urban Development Unit (April 2017) *Rapid Health Impact Assessment Tool Third Edition*.

3. Healthy environment; and
4. Vibrant neighbourhoods.

3.16 Each theme contains a number of questions focused on a planning issue and a number of related health and wellbeing issues as set out in the table below. The checklist has been used as a screening exercise to inform the more detailed Rapid HIA and is included at Appendix 3. To avoid repetition, full details on how the Development responds to the themes in the checklist is provided in Chapter 4 as part of the Rapid Health Impact Assessment.

Table 1: Themes within the HUDU Healthy Urban Planning Checklist

Theme	Planning Issue	Health and Wellbeing Issue
Healthy Housing	<ul style="list-style-type: none"> • Housing design • Accessible housing • Healthy living • Housing mix and affordability 	<ul style="list-style-type: none"> • Lack of living space – overcrowding • Unhealthy living environment – daylight, ventilation, noise • Excess deaths due to cold / overheating • Injuries in the home • Mental illness from social isolation and fear of crime
Active Travel	<ul style="list-style-type: none"> • Promoting walking and cycling • Safety • Connectivity • Minimising car use 	<ul style="list-style-type: none"> • Physical inactivity, cardiovascular disease and obesity • Road and traffic injuries • Mental illness from social isolation • Noise and air pollution from traffic
Healthy Environment	<ul style="list-style-type: none"> • Construction • Air quality • Noise • Contaminated land • Open space • Play space • Biodiversity • Local food growing • Flood risk • Overheating 	<ul style="list-style-type: none"> • Disturbance and stress caused by construction activity • Poor air quality - lung and heart disease • Disturbance from noisy activities and uses • Health risks from toxicity of contaminated land • Physical inactivity, cardiovascular disease and obesity • Mental health benefits from access to nature and green space and water • Opportunities for food growing – active lifestyles, healthy diet and tackling food poverty • Excess summer deaths due to overheating
Vibrant Neighbourhoods	<ul style="list-style-type: none"> • Healthcare services • Education • Access to social infrastructure • Local employment and healthy workplaces • Access to local food shops • Public buildings and spaces 	<ul style="list-style-type: none"> • Access to services and health inequalities • Mental illness and poor self-esteem associated with unemployment and poverty • Limited access to healthy food linked to obesity and related diseases • Poor environment leading to physical inactivity • Ill health exacerbated through isolation, lack of social contact and fear of crime

3.17 The checklist (see Appendix 3) and the Rapid HIA have been completed using professional judgement and information from the following planning application documents:

- Planning Application Form (incl. Certificates of Ownership);
- Environmental Statement;
- Planning Statement;
- Affordable Housing Statement;
- Existing & proposed architectural and landscape drawings;
- Landscape drawings and landscape masterplan;
- Masterplan Statement;
- Design, Landscape & Access Statement;
- Design Code and Parameter Plans;
- Heritage Statement;
- Statement of Community Involvement;
- Internal daylight and sunlight assessment;
- Site waste management plan;
- Energy Strategy;
- Sustainability Strategy;
- Overheating Strategy;
- Foul Sewage and Utilities Assessment;
- Flood Risk Assessment and Drainage Strategy;
- Wind Microclimate Assessment;
- Land Contamination Assessment (Phase 1 report); and
- Arboricultural Survey and Implications Assessment.

The HUDU Rapid Health Impact Assessment Tool

3.18 The rapid assessment tool is designed to assess the likely health impacts of development plans and proposals. The scope of assessment has been informed by the completed HUDU checklist at Appendix 3.

3.19 The assessment matrix (see Chapter 5) identifies eleven topics of broad determinants:

- Housing quality and design;
- Access to healthcare services and other social infrastructure;
- Access to open space and nature;
- Air quality, noise and neighbourhood amenity;
- Accessibility and active travel;
- Crime reduction and community safety;
- Access to healthy food;
- Access to work and training;

- Social cohesion and lifetime neighbourhoods;
- Minimising the use of resources; and
- Climate change.

3.20 Under each topic, planning issues which are likely to influence health and wellbeing are identified. The Rapid Assessment Tool provides assessment criteria and these have been tailored where possible to the Development. Where an impact has been identified, recommendations to mitigate an adverse impact or enhance a beneficial impact are included where possible.

4 BASELINE CONDITIONS

4.1 This chapter of the HIA provides a high-level overview of the baseline health conditions within LBW and the wards to Roehampton and Putney Heath, which the Site is located within.

Health conditions in LBW

4.2 Public Health England publish annual health profiles for Local Authorities across England. The latest for LBW was published in July 2018 (Appendix 4).

4.3 Generally, the health profile for LBW is better than the England average. In 2016, the population of LBW was approximately 321,000 which is projected to increase to 341,900 by 2030, which is when the Development is anticipated to be completed by. The largest proportion of the population in LBW are aged between 25 and 44. Life expectancy at birth is higher for women than men within LBW, however the life expectancies for both are better than the England's average.

4.4 Male life expectancy at birth in LBW for 2014 to 2016 was 80.0 years and for females it was 83.8 years. For both males and females, these figures are higher than England's average of 79.5 years and 83.1 years, respectively. Between the most and least deprived areas of LBW, life expectancy varies by 8.8 years for men and 4.9 years for women.

4.5 The under 75 mortality rate for men within LBW is higher than England's average, whereas there rate is comparable for women within LBW and England's average.

Child Health

4.6 The child health within LBW is comparable to England's average; 20.5% of children aged 10-11 in 2016/17 in LBW were identified as obese, which is similar to England's average of 20%. In 2016, it was identified that the infant mortality rate within LBW was 2.8%, which is better than England's average of 3.9%. The alcohol-specific admissions to hospital for under 18s between 2014/15 and 2016/17 within LBW was 19.7 per 100,000, compared to England's average of 34.2 per 100,000.

Adult Health

4.7 Public Health England estimated that in 2016/17 48.2% of the adults within LBW carry excess weight, which is below England's average of 61.3%. However, 71.7% of adults aged 19 years

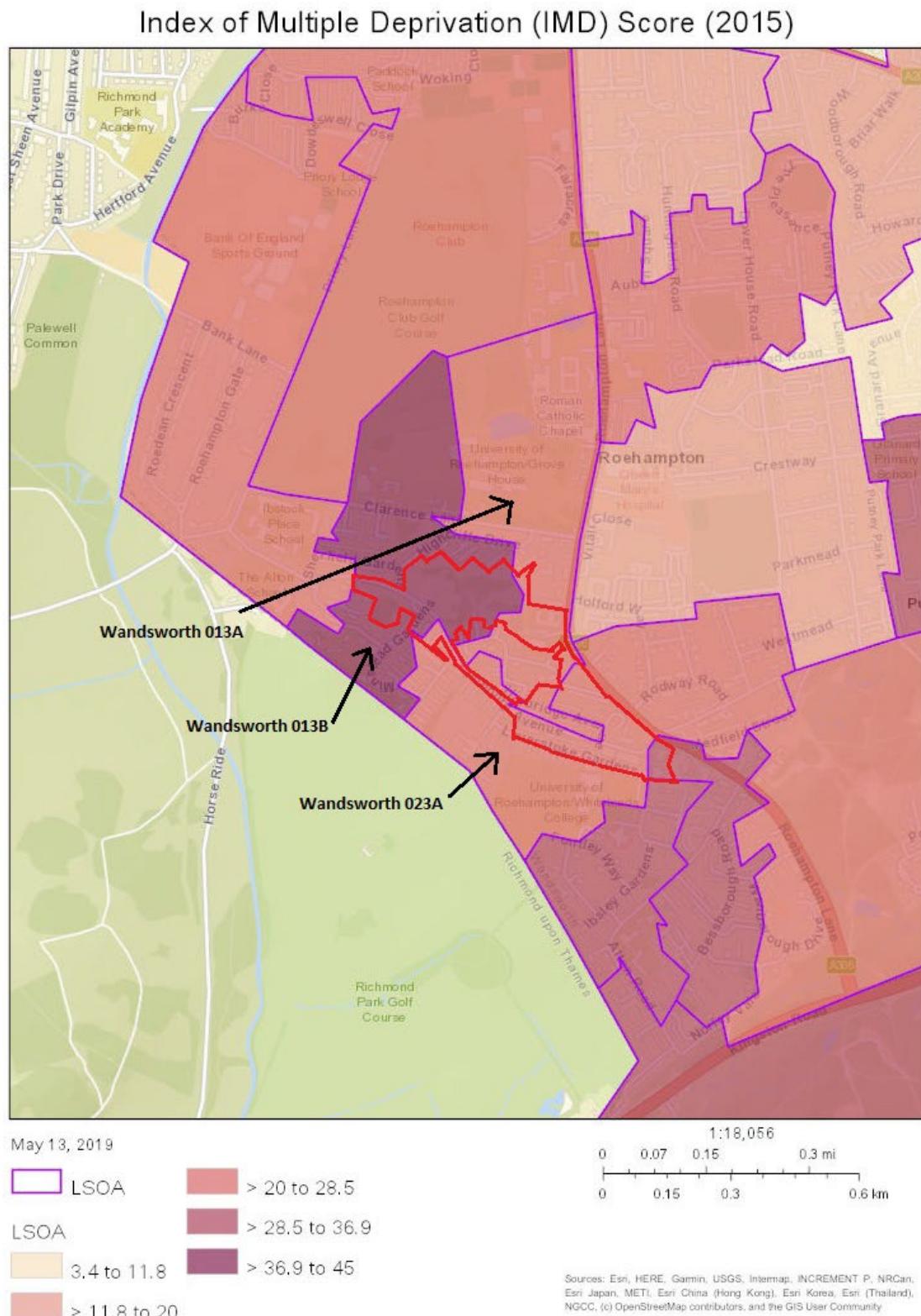
and above have been recorded as physically active within LBW which is higher than England's average of 66%. The smoking levels of the adults within LBW in 2017 has been estimated at 13.2% which is lower but not significantly different from England's average of 14.9%. Rates of sexually transmitted infections, new cases of tuberculosis, diabetes diagnoses and early deaths from cardiovascular diseases are worse than England's average. Whereas, rates of statutory homelessness, violent crime, early deaths from crime and the percentage of people in employment are between than England's average.

Deprivation levels

4.8 According to the Indices of Deprivation (2015)¹⁹, LBW is ranked 158th out of 326 for the most deprived local authority in England. Within LBW there are pockets of considerable deprivation. The Site extends across three Lower Super Output Areas (LSOAs); Wandsworth 013A, Wandsworth 013B and Wandsworth 023A (see Figure 1 below), ranked at 9,637, 4,491 and 10,693 respectively out of 32,844 LSOAs in England. The western extent of the Site is located within LSOA Wandsworth 013B which is the 8th most deprived LSOA in LBW (out of 179 LSOAs) and falls within the most deprived 10% of LSOAs in LBW on the: Income Domain; Employment Domain; Education, Skills and Training Domain; Health Domain; and Barriers to Housing and Services Domain. Whilst not as deprived as Wandsworth 013B, LSOAs 013A and 023A both have some significant levels of deprivation falling within the most 20% deprived of LSOAs in LBW in nearly all of the seven deprivation domains, as shown on Figure 1.

¹⁹ MHCLG (September 2015) *English Indices of Deprivation 2015*

Figure 1. Overall Index of Deprivation Score for the LSOA's where the Site is located and the surrounding areas.



4.9 Specifically, the health deprivation domain measures the risk of premature death and the impairment of quality of life through poor physical or mental health. The Wandsworth 013A and 023A LSOA's are among 50% of the most deprived areas in England, ranked at 13,910 and 13,974 respectively. Comparatively, Wandsworth 013B is ranked at 9,074 out of the 32,844 LSOA's in England, making it among the 28% most deprived in terms of health deprivation and disability.

Health conditions in Roehampton and Putney Heath ward

4.10 As mentioned previously, the Site is located within the electoral ward of Roehampton and Putney Heath. The population of Roehampton and Putney Heath in 2018 was 15,965 and is estimated to be 18,322 by 2030. The largest age group of the ward is the 20-24 group, whereas for LBW and Greater London is the 30-34 age group. Based on the ONS Census (2011), 66.2% of the population within the ward is economically active, where the full-time employment rate is below the rate for both LBW and England. In addition, the ONS Census data (2011) identified that 18.2% of the population within the ward has no qualifications which is higher than LBW levels, but lower than England's average. Between January 2018 and December 2018, 1,393 crime cases were recorded in the ward, with violence and sexual offences as the highest type of crime in the 12-month period for the ward. The rate of violence and sexual offences recorded within the ward is higher than the recorded cases in Wandsworth and England's average.

Child Health

4.11 Of the population within Roehampton and Putney Heath ward, 23.3% of year 6 children are obese which is significantly worse than both the LBW borough and England's average, 19.5% and 19.3% respectively. 51.9% of children within Roehampton and Putney Heath ward achieve GCSE's (5A* - C inc. English and Maths), which is much lower than LBW's average at 63.1% and slightly less than England's average of 56.6%. The number of children aged 15 who regularly smoke within the ward, is similar to both LBW's and England's average.

Adult Health

4.12 Within the Roehampton and Putney Heath ward, it has been identified by Public Health England that 24.6% of households are overcrowded (at least 1 room too few) which is significantly worse than England's average of 8.7%. In addition, 45.3% pensioners live alone within the ward, which is also significantly worse than England's average of 31.5%. The level of obesity within the ward is significantly better than England's average, at 18.4% of the adult population compared to England's average of 24.1%. The level of binge drinking within the

ward is not significantly different to both LBW's and England's average. The percentage of population within the ward that states the general health is 'very bad' is 1.2% which is not significant different to both LBW's and England's average.

Alton and Putney Vale health profile

4.13 The assessment that has been undertaken on the Alton and Putney Vale regeneration area has identified that this area is amongst the 20% most deprived neighbourhoods in England and amongst the 10% most deprived with respect to income and housing. Approximately 9,777 people live within the Alton and Putney Vale area, with Alton's demographic comprises of mainly 16-29-year olds when compared to the rest of LBW, whereas Putney Vale comprises of more 45-64-year olds than LBW's average. The average life expectancy for those within Alton and Putney Vale is approximately 76 years for men and 82 years for women, which are both lower than LBW's average. In addition, 18% of adult within Alton and Putney Vale are obese, which is higher than LBW's average.

4.14 The Alton and Putney Vale area is set within close proximity to large expanses of existing open space comprising of Richmond Park, Putney Heath and Wimbledon Common. Most of the areas within Alton and Putney Vale are located within 400m of designated play facilities.

4.15 The majority of the areas within Alton and Putney Vale have been identified to have average access to public transport, which is similar to LBW's average. However, in some areas, nearly half of residents have poor access to public transport.

4.16 LBW is located within an Air Quality Management Area where the thresholds of Nitrogen Dioxide and Particulate Matter concentrations have been breached. The main source of air pollution within Alton and Putney Vale is road traffic.

4.17 It has been identified that the proportion of children in Reception classes within Alton and Putney Vale that are overweight or obese has been declining over the past 6 months and is currently at 22.3%. However, this is higher than LBW's average at 19.6%. In addition, 37.6% of children within Year 6 are overweight or obese, which is higher than the average of LBW.

4.18 Further detail on the health profile of Alton and Putney Vale is provided in the published report by LBW in 2018 and is found at Appendix 6.

General Health in the local area

4.19 The 2011 Census comprised of a qualitative assessment where the public asked to describe

their general health over the preceding 12 months, by ranking their health from 'very good' to 'very bad'²⁰. This record provides an indication on how health is perceived in the local area in which the Site is located. As identified earlier, the Site is located within three LSOA's; Wandsworth 013A, Wandsworth 013B and Wandsworth 23A, as shown on Figure 1. Table 2 below compares the results of this questionnaire from the 2011 Census within the local ward of Wandsworth and England as a whole.

Table 2: Description of individual health from the 2011 Census

Descriptor	Wandsworth 013A	Wandsworth 013B	Wandsworth 023A	Wandsworth (Borough)	England
Very good health	49.7%	48.4%	53.1%	57.4%	47.6%
Good health	36.7%	33.3%	34.2%	29.9%	33.6%
Fair health	9.0%	12.9%	8.7%	8.9%	13.2%
Bad health	3.7%	4.2%	3.4%	2.9%	4.3%
Very bad health	0.9%	1.2%	0.6%	0.9%	1.3%

4.20 Table 2 identifies that at the time of the 2011 Census 86.4%, 81.7% and 87.3% of people living in Wandsworth 013A, Wandsworth 013B and Wandsworth 023A, respectively described their health as either very good or good. These are all consistently higher than England's average of 81.2% and are either similar or less than LBW's average of 87.3%. The residents residing within Wandsworth 013B recorded the highest percentage of people who classed their health as very bad (1.2%) compared to Wandsworth 013A and Wandsworth 023A, this figure is higher than LBW's average (0.9%) but lower than England's average (1.3%).

Healthcare Infrastructure Audit

4.21 There are currently four GP Practices operating within Roehampton (see Appendix 5). The Healthy Urban Development Unit (HUDU) sets a standard of 1 GP per 1,800 patients against which the existing GP to patient ratios of local Practices can be assessed. Data acquired from the NHS General and Personal Medical Services Statistics for March 2018 provides patient list size and number of full time equivalent (FTE) GPs at each Practice. Table 3 indicates that one GP Practice is currently operating below the GP to patient ratio of 1 GP per 1,657 population. The Mayfield Surgery currently has a GP to patient ratio of 1:1,588. Were each of the four full-time equivalent GPs (as recorded by the annual GP census) to increase their patient list size to 1,657, capacity would be demonstrated for an additional 276 patients.

²⁰ NOMIS, Office for National Statistics: 2011 Census (General Health), online access <https://www.nomisweb.co.uk/> (data accessed 1st May 2019)

Table 3: GP Practices at March 2018

No	Name	Postcode	Patients	GP	Ratio
1	Danebury Avenue Surgery	SW15 4DU	3,126	1.31	2,386
2	The Roehampton Surgery	SW15 4HN	5,851	2.13	2,747
3	The Alton Practice	SW15 4LE	3,852	1.75	2,201
4	Mayfield Surgery	SW15 4AA	6,354	4.0	1,588

Source: NHS Digital (March 2018) General and Personal Medical Services

4.22 A study of local dentist provision also identifies three dental practices within Roehampton (see Appendix 5). The Practices are currently offering a mix of NHS and Private patient registrations (albeit the Westmoor Clinic operating on a referral basis only).

4.23 Whilst not primary healthcare, it is noteworthy that the Site is located to the south of the Queen Mary's Hospital, Roehampton which include outpatient rapid diagnostic and treatment facilities, a minor injuries unit, limb fitting services and intermediate care and rehabilitation beds. In addition, to the south east of the Site is the Huntercombe Hospital – a psychiatric intensive care hospital for people with mental health conditions.

5 RAPID HIA

5.1 The tables below set out the potential health and wellbeing impacts associated with the Development during the demolition and construction and operational phases. As set out in the Assessment Methodology section in Chapter 2, the tables have been adapted from the HUDU Rapid Health Impact Assessment Tool²¹.

1. Housing Quality and Design

5.2 The first theme assessed is Housing Quality and Design which can have an effect on both the physical and mental health of residents. The provision of a range of housing of high-quality design that have sufficient space for future residents to live in can have a positive health effect by reducing injuries in the home, premature deaths from damp/cold/overheating and mental illness from social isolation.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
Does the proposal seek to meet all 16 design criteria of the Lifetime Homes Standard or meet Building Regulation requirement M4 (2)?	Yes ✓ No N/A	<p>The Building Regulations Part M supersedes the Lifetime Homes guidance.</p> <p>The Development will meet the Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. The Development will provide 90% of the new homes (993 residential units) across the Site to be designed to comply with the Building Regulation requirement M4(2), which will provide a healthy environment and generate a positive health effect.</p>	Positive ✓ Negative Neutral Uncertain	N/A	Policy 3.8 of the London Plan states that 90% of new housing should meet the Building Regulation Part M4(2), which the Development complies with.
Does the proposal address the housing needs of older people,	Yes ✓ No N/A	The Building Regulations Part M supersedes the Lifetime Homes guidance.	Positive ✓ Negative Neutral	N/A	Policy 3.8 states that 10% of the new housing

²¹ London Health Urban Development Unit (April 2017) *Rapid Health Impact Assessment Tool Third Edition*.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
i.e. extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes?		<p>The Development does not comprise extra care and sheltered housing.</p> <p>The Development does address the housing needs of older people through the provision of 10% of all units (110 residential units) to be wheelchair adaptable and accessible units designed to comply with Building Regulation Part M4(3) and will be delivered across the masterplan. These have been evenly spread across the detailed and outline elements of the Development to ensure that households that need wheelchair accessible or wheelchair adaptable apartments are not clustered together.</p> <p>The Development addresses the housing needs of older people and provides high quality facilities for older people. will provide a positive health effect.</p>	Uncertain		should meet Building Regulation Part M4(3), which the Development does by providing 120 of these units (more than 10%).
Does the proposal include homes that can be adapted to support independent living for older and disabled people?	Yes ✓ No N/A	As mentioned above, of the 1,103 new residential units proposed as part of the Development, 110 of these are wheelchair adaptable units as defined by Building Regulations M4(3). These have been spread across the Site to prevent clustering and allow the entirety of the Site to be accessible to all. All other buildings will meet the Building Regulations M4(2) standards. All residential units are suitable to be adapted to support independent living for older and disabled people. Therefore, the Development will provide a positive health effect.	Positive ✓ Negative Neutral Uncertain	N/A	Compliant with Policy 3.8, as above,
Does the proposal promote good design through layout and orientation, meeting internal space standards?	Yes ✓ No N/A	The Development promotes good design through layout and orientation. The design of the Development has been developed in line with 'Secured by Design' principles with further guidance from 'Secured by Design – New Homes 2016' and 'Secured by Design – Multi-Storey Dwellings'. In addition, the Development has been through a process of consultation, workshops and public exhibitions to inform the design process to ensure all requirements are met, including internal space standards.	Positive ✓ Negative Neutral Uncertain	N/A	The design of the development has carefully considered the requirements of Policies 3.5, 7.1 to 7.7 and Policy IS3 of the Core Strategy

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
		<p>The Development is compliant with the Draft New London Plan requirements, Chapter 3 'Design' Policy D4 'Housing Quality Standards' and Policy D5 'Accessible Standards/M4(2)'. For example, a typical 1-bed, 2-person residential unit will be 51sqm in size, with 2sqm of built-in storage and 5sqm of outdoor amenity space.</p> <p>The design of the Development has evolved to create well-defined character areas across the Site, each having been designed specifically for their use. This allows the residents to 'way-find' across the Site themselves, as well as enabling emergency services and refuse collection services to navigate across the Site efficiently. Furthermore, the design of the Development complements 'Dementia Friendly' principles;</p> <ul style="list-style-type: none"> • The Development looks to enhance the integration of the Site with the surrounding neighbourhood of Roehampton and Putney Heath; • The Site is easy to approach, enter and move around in, where each entrance will have its own unique design that will aid way finding within the Development; • The Development is easy to understand through clearly defined character areas, safe to use with natural surveillance methods integrated into the design and management of the Site; and • With part of the application in outline, this allows the Development to be flexible, cost effective and adaptable over time. <p>The design of the Development has ensured that active travel is a key component across the Site to promote active lifestyles through the layout. The streetscape design will create a healthy environment for the future residents to use in a safe manner and enable the residents to access all parts of the Development by active travel. This also creates opportunities</p>			<p>throughout the planning application process to ensure a high quality development will be provided in accordance with the London Plan.</p>

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
		<p>for social interaction and build a shared sense of ownership and community spirit, contributing to healthy well-being.</p> <p>These provisions and the careful design of the Development will create a positive health effect and improve the levels of deprivation currently experienced in Alton and Putney Vale regeneration area.</p>			
Does the proposal include a range of housing types and sizes, including affordable housing responding to local housing needs?	Yes ✓ No N/A	<p>London Plan policies 3.11 and 3.12 and LBW's Core Strategy Policy IS5 identifies the amount of affordable housing to be provided. In addition, Policy 3.14 of the London Plan states that existing affordable housing floorspace should be replaced on an equivalent basis or more.</p> <p>The Development includes the delivery of up to 1,103 residential dwellings across the Site to be provided in a range of tenures, including social rent, shared equity and market housing. The residential dwellings will vary in size from 1-bed 1-person to 4-bed 8-persons.</p> <p>A total of 256 affordable homes will be delivered as part of both the detailed and outline elements of the Development, these will include 188 social rented homes and 68 intermediate tenure homes. This would represent a net increase of 98 affordable homes from the existing Site, including 30 social rented homes and 68 intermediate tenure homes. As a result, approximately 9,755sqm of additional affordable floorspace will be provided by the Development, including an increase of 12.7% at a tenure split of 43.6% social rent and 56.4% intermediate.</p> <p>An Affordable Housing Statement has been submitted in support of the planning application which demonstrates that the reasonable maximum amount of affordable housing would be delivered and provide the details of the proposed affordable tenures.</p>	Positive ✓ Negative Neutral Uncertain	N/A	The housing mix provided by the Development has been determined by complying with Policy 3.11, 3.12 and 3.14, DMPD Policy DMH3 and Core Strategy IS5 of the London Plan.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
		<p>A detailed Housing Needs Assessment undertaken in 2017 was conducted to determine the specific needs of each individual tenant and has informed the likely size of homes required in terms of the social rent tenure.</p> <p>The Affordable Housing Statement for the Development demonstrates that the affordable housing mix for the Development provides a direct need and is justified against LBW's Core Strategy Policy IS5. The baseline section of this HIA has identified that the Site is located within an area that is amongst the 20% most deprived neighbourhoods in England and amongst the 10% most deprived with respect to income and housing. By providing a range of housing as detailed earlier, the Development will provide residential units of an affordable price that fit the needs of each family and tackle overcrowding issues. Therefore, the Development is considered to promote health and well-being by providing a variety of sized dwellings to accommodate all needs, therefore a positive health effect is anticipated.</p>			
Does the proposal contain homes that are highly energy efficient (e.g. a high SAP rating)?	Yes ✓ No N/A	<p>An Energy Statement has been submitted in support of the planning application which sets out the measures to be included in the Development which will ensure the Development is compliant with the London Plan policies.</p> <p>The Development has been designed to comply with the objectives of the energy hierarchy: Be Lean, Be Clean, Be Green. The Development contains homes that will be built with energy-efficient building fabric and insulation, double-glazed windows, high-efficient heating and ventilation systems and low-energy lighting throughout the buildings. All new homes will achieve the zero-carbon standard through the mechanism of a carbon-offset payment.</p> <p>A CHP-led energy centre will be provided for both the</p>	Positive ✓ Negative Neutral Uncertain	<u>Mitigation measure:</u> Planning conditions to be attached to the permission to ensure plant such as heating and cooling units operate to acceptable standards, on completion of the Development.	The Development has been designed to ensure its compliance with Policies 5.1 to 5.9 and 5.15, Core Strategy policies IS1 and IS2 and Policy DM3 of the DMPD to achieve London's objective to achieve an overall reduction in CO ₂ emissions.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
		<p>domestic and non-domestic elements of the Development, with back-up boilers and a communal gas boiler system, which will provide a site-wide and sustainable supply of energy.</p> <p>The energy strategy for the Site as identified above, will address the fuel poverty currently experienced in the existing residential units on the Site. The buildings and residential homes will be of a higher-quality design and comprise better insulation, thus achieving improved energy efficient and alleviating fuel poverty as a result.</p> <p>The Applicant's commitment to ensure the Development is highly energy efficient will generate a positive health effect as a result.</p>			

2. Access to Healthcare Services and Other Social Infrastructure

5.3 Access to healthcare services and other social infrastructure is important to ensure every member of the public has equal access to healthcare services to treat illness and injuries as well as education opportunities. In addition, access to community services can increase levels of social interaction and prevent feelings of isolation.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
Does the proposal retain or re-provide existing social infrastructure?	Yes ✓ No N/A	<p>The Site currently comprises 6,083sqm of community floorspace, of which 4,073sqm is occupied with 2,010sqm being currently vacant. The Development seeks to retain the existing community uses on the Site but enhance these uses by providing 5,527 sqm of new and replaced in-use community facilities floorspace.</p> <p>The range of new and replacement community facilities which will be designed to be high-quality, flexible spaces that can be co-located in centralised strategically located buildings so to ensure the usability and functionality of the floorspace is maximised.</p> <p>The replacement community floorspace with enhanced services and facilities including a flexibly designed multi-purpose community hub comprising replacement library, café, office and community floorspace, medical facilities, youth centre, elderly residents club room and a community hall will provide a focal point for the regeneration and the community.</p> <p>In addition, the Development also proposes to deliver a new Eastwood Nursery and Children's Centre plus community facilities at Portswood Place. The provision of replacement community floorspace on the Site will promote a sense of neighbourliness within the Site, which will improve the health and well-being of the residents and therefore, create a positive health effect.</p>	Positive ✓ Negative Neutral Uncertain	N/A	<p>There are no specific policies within the London Plan in relation to healthcare services.</p> <p>The Development complies with the objectives of Core Policies PL1 and PL15 in LBW's Local Plan to ensure an attractive and distinctive neighbourhood is created through the regeneration process which includes a range of services to serve the future residents of these areas.</p>

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
Does the proposal assess the impact on healthcare services?	Yes ✓ No N/A	<p>Chapter 4 of this HIA has identified the baseline conditions in terms of the current healthcare infrastructure surrounding the Site.</p> <p>Chapter 4 of this HIA has identified that there are four GP practices within walking distance of the Site, where only one GP Practice is currently operating below the HUDU recommended ration of 1 GP per 1,657 patients; the Mayfield Surgery.</p> <p>The Development proposes the provision of additional healthcare facilities which will increase GP provision in proximity of the Site by an additional 3 GPs which would generate capacity for 4,971 patients. It is considered that the additional GP provision provided by the Development is in excess of the needs arising from the Development. The additional healthcare facilities will also assist in providing GP services beyond the extent of the Development and will be an alternative option for residents in the surrounding communities to the other existing local GP practices.</p> <p>The assessment found that the Development will have a moderate beneficial effect on primary healthcare provision and is considered to have a positive health effect for the local community, especially those who are highly depending on local health services, such as disabled people.</p>	Positive ✓ Negative Neutral Uncertain	N/A	As above.
Does the proposal include the provision, or replacement of a healthcare facility and does the facility meet NHS requirements?	Yes ✓ No N/A	<p>As mentioned above, the Development will provide the provision of additional healthcare facilities which will increase GP provision of the Site by an additional 3 GPs. Based on the HUDU recommended standard, this increased healthcare provision would generate capacity for 4,971 patients. As above, the excess capacity will assist in providing GP services to the surrounding communities. Therefore, a positive health effect is anticipated on healthcare provision.</p>	Positive ✓ Negative Neutral Uncertain	N/A	As above.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
Does the proposal assess the capacity, location and accessibility of other social infrastructure, e.g. schools, social care and community facilities?	Yes ✓ No N/A	<p>Chapter 6 'Population and Human Health' of the ES assesses the capacity, location and accessibility of social infrastructure other than healthcare infrastructure in the area.</p> <p>It has been assessed that there is sufficient pupil place surplus which exists at both primary and secondary level to accommodate the needs of the Development. Therefore, it was assessed that the Development will have a negligible effect on education provision in the local area and no additional mitigation is required.</p> <p>The Development will replace the existing with new community facilities space on the Site and will be of high-quality design. The provision of the community floorspace will be mostly delivered through the detailed element of the Development, to ensure its delivery is early in the construction programme and therefore support the future residents of the Development as the Site is built out. The provision of replacement community floorspace will encourage a sense of community feeling within the future residents and improve their health and well-being, thereby creating a positive health effect.</p>	Positive ✓ Negative Neutral Uncertain	N/A	The Development retains and enhances the existing social infrastructure on the Site. The Development has been subject to asessment which has ensure that the Development will comply with Policies 3.16 to 3.19, Policy 7.1 of the London plan, Policy IS6 of LBW's Core Strategy and Policy DM2 of the DPMD.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
Does the proposal explore opportunities for shared community use and co-location of services?	Yes ✓ No N/A	<p>The Development does explore opportunities for shared community use and the co-location of services. The Development will deliver 5,527sqm of new and replacement community floorspace. The Development includes a new multi-purpose community facility which will include a library, a community hall and facilities for youth services and health services and will be provided in Block A of the Development, accessible to the future residents of Alton Estate and the surrounding communities.</p> <p>The Development also proposes to deliver a new Eastwood Nursery and Children's Centre and community and health/community facilities at Portswood Place.</p> <p>The provision of all the community services as part of the Development have been strategically located to be in accessible locations on the Site to benefit all needs of the future residents and employees of the Site. The co-location of these services creates community hubs to attract the future residents of the Site to collate and support each other, thereby creating a support network within the neighbourhood and ultimately improving the health and well-being of the future residents. Therefore, a positive health effect is anticipated for the Development.</p>	Positive ✓ Negative Neutral Uncertain	N/A	As above.

3. Access to Open Space and Nature

5.4 The provision of attractive open space and nature within or in close proximity to a development can promote mental and physical health and reduce morbidity and mortality in urban residents by providing psychological relaxation and stress alleviation, stimulating social cohesion, supporting physical activity and reducing exposure to poor air quality.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
Does the proposal retain and enhance existing open and natural spaces?	Yes ✓ No N/A	<p>The Site currently includes 82,574sqm of open space, however this space is not formally designed as 'Public Open Space'. The Development will retain and enhance the existing open space on the Site and include a net increase of 5,323 sqm of open space provision (6.4% increase), thus the Development will provide a total of 87,897sqm on the Site. In addition, a large proportion of the existing trees on the Site will be retained and those that are removed will be replaced to offset any loss.</p> <p>The retention and enhancement of the existing open space and the extra provision of open space will provide opportunities for the future residents to use this space, thereby creating a positive health effect.</p>	Positive ✓ Negative Neutral Uncertain	N/A	<p>The Development complies with Policies 2.18 and 7.18, Policy PL4 of the Core Strategy and Policies DMH7, DMO1 and DMO3 of the DMPD by retaining the existing open space within the site but also enhancing these spaces to make them attractive and safe to use.</p> <p>The Development is also compliant with the open space and play space objectives of the</p>

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
					Roehampton SPD.
In areas of deficiency, does the proposal provide new open or natural space, or improve access to existing spaces?	Yes✓ No N/A	<p>At the entrance to the Site off Roehampton Lane, there is a hardstanding area and a soft landscaped area. These pockets are poor quality spaces with no defined function. The Site currently suffers from poor legibility throughout and at the key entrances to the Site.</p> <p>As mentioned above, the Development will retain and enhance the existing open space on the Site and provide 87,897sqm of total open space will be provided as part of the Development. In addition, the Development includes a series of ramps and stairs where appropriate, specifically in Block K to facilitate pedestrian movement across the Site, to ensure all users of the Site can access the existing and improved open spaces.</p> <p>The baseline assessment included in Chapter 6 'Population and Human Health' of the ES identified that there was a deficit of child's play space in both LBW and Roehampton. The Development will provide new child play space within the open space areas of the Site to offset this deficiency.</p> <p>The Site currently benefits from the close proximity to the regional and metropolitan parks of Putney Heath and Wimbledon Common, as well as Richmond Park. The Development will seek to improve the connections to existing spaces surrounding the Development, such as Roehampton playing fields to the north-east of the Site and potentially provide a future link to Richmond Park to the south-west of the Site.</p> <p>Therefore, the Development will deliver a net increase in the amount of open space on the Site, thereby complying with the requirements of the NPPF, the adopted London Plan, the</p>	Positive ✓ Negative Neutral Uncertain	N/A	As above.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
		draft London Plan, LBW Core Strategy, LBW DMPD and Roehampton's SPD. A positive health effect is anticipated.			
Does the proposal provide a range of play spaces for children and young people?	Yes ✓ No N/A	<p>There are currently 2 existing playgrounds for all ages on the Site at Alton Activity Centre and Downshire Field play space. These areas will be redesigned to improve these areas for the existing and new residents of the Development.</p> <p>However, there is a deficiency in the play provision for various age groups across LBW and Roehampton specifically. The Development includes the provision of a mixture of children's play spaces across the Site:</p> <ul style="list-style-type: none"> Doorstop play facilities for 0-4-year olds will be provided within the communal courtyards located within the demise of the residential blocks; A play facility for all ages will be provided within the Village Square; A new play hub that will be open to the public will be provided at the Alton Activity Centre; A new play hub will be provided within Downshire Field where the existing play park will be replaced and enlarged; and 'Play on the way' facilities suitable for all ages will be positioned around Downshire Field. <p>The doorstep play areas will be located within the smaller areas of the Development and will have a maximum walking distance of 100m from residential units.</p> <p>The local play spaces will be at a maximum distance of 400m from residential units and will be a landscaped area with equipment so that children up to 10 can play in these spaces.</p> <p>All ages play spaces will be provided at a maximum distance</p>	Positive ✓ Negative Neutral Uncertain	N/A	The amount of play space provision on the Site has been determined to ensure that the Development meets and exceeds the benchmark set out in the GLA's and LBW's SPG documents, thus compliance with the London Plan is achieved.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
		<p>of 200m from the residential units. These spaces will provide a social and active space for informal sport or physical recreational activities to take place.</p> <p>The Development will provide a total of 7,657sqm of play space provision on the Site, which includes upgraded play facilities of local play space (5-11 year olds). The play space provision as part of the Development exceeds both the GLA and LBW's benchmark by 4,038sqm. Therefore, the Development will provide a range of play spaces for children and young people of the Site and surrounding area to access and use, creating a positive health benefit.</p>			
Does the proposal provide links between open and natural spaces and the public realm?	Yes ✓ No N/A	<p>There are existing connections to surrounding open and natural spaces, including Downshire Field, Putney Heath and Roehampton playing fields from the Site. The Development will seek to retain the existing connections and enhance them to create more legible and accessible routes between the residential and commercial elements of the Development to aid permeability and provide a clear gateway from all areas of the Development to Downshire Field, Putney Heath and Roehampton playing fields.</p> <p>The Development will also aspire to provide a future link to Richmond Park to the south-east of the Site, which would provide a more direct route and make Richmond Park more accessible.</p> <p>The Development will provide opportunities for the future residents to access the open space within the Site and the surrounding areas, thereby aiding the active design principles by providing pedestrian and cycle connections that are direct to these areas of open spaces and public realm. A positive health effect is anticipated as the Development is considered to promote healthy lifestyles through the amount of open space provision.</p>	Positive ✓ Negative Neutral Uncertain	N/A	The Development has assessed the deficiency and access of open spaces surrounding the Site and by complying with Policy 7.18 of the London Plan the Development has incorporated links for the public to access the surrounding open spaces.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
Are the open and natural spaces welcoming and safe and accessible for all?	Yes ✓ No N/A	<p>The Development has been designed in line with 'Secured By Design' principles, with further design guidance from the Secure by Design Officer at two workshops held on the 27th November 2017 and 31st October 2018.</p> <p>The open and natural spaces have been carefully designed to ensure that each area has its own character that is welcoming and safe to use. In addition, the lighting of the Development has been designed to assist the natural surveillance of the Site whilst enhancing the public spaces and streets.</p> <p>As mentioned earlier, the Development has included a series of stairs and ramps across the Site due to a level change of between three and six metres across the Site. The provision of these features will ensure pedestrian movement across the Site is facilitated and offer opportunities for all future users of the Site to access each element.</p> <p>The Development has also been subject to a detailed study which has evolved to create a series of 'Character Areas' within the Site which will create a difference of appearance and aid natural navigation throughout the Site. The entrances to each 'Character Area' will be defined through the use of materials, colours and art work to provide a welcoming entrance to each part of the Site.</p> <p>All open and natural spaces will be accessible for all and include disabled access, through the incorporation of ramps.</p> <p>The Site is located within a neighbourhood that is amongst the 20% most deprived neighbourhoods in England. The lighting design of the Development will improve the physical appearance of the Site and decrease the levels of deprivation within the Site by making it welcoming and safe, thereby creating a positive health effect.</p>	Positive ✓ Negative Neutral Uncertain	N/A	The Development has been designed in accordance with Policy 3.6 to ensure the play space provided as part of the Development is safe, welcoming and accessible.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
Does the proposal set out how new open space will be managed and maintained?	Yes ✓ No N/A	Chapter 12 'Biodiversity' of the ES submitted in support of the planning application proposes the mitigation measures to help manage and maintain the new areas of open space on the Site. A Management Plan has been suggested within Chapter 12 to mitigate effects during the operational phase of the Development. The Management Plan would ensure the landscaping planting and strategy is delivered and successfully fulfils conservation objectives and habitat protection on the Site.	Positive ✓ Negative Neutral Uncertain	<u>Mitigation measure</u> Provide a Management Plan that will be secured via a planning condition.	The policies within the London Plan do not make specific reference to management and maintenance of open spaces. However, the Development has been designed in accordance with LBW's Core Policy PL4 and therefore shows compliance.

4. Air Quality, Noise and Neighbourhood Amenity

5.5 The next theme assessed is the Developments affect upon air quality, noise and neighbourhood amenity. Poor air quality where there are high concentrations of Nitrogen Dioxide and Particulate Matter can cause lung and heart disease and thus lower the health of future residents and users of the Site. Noisy activities and uses can cause disturbance, sleep deprivation and direct annoyance which in turn has an effect on mental health.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
Does the proposal minimise construction impacts such as dust, noise, vibration and odours?	Yes ✓ No N/A	<p>The Development has sought to minimise construction impacts such as dust, noise, vibration and odours where possible. The technical chapters of the ES submitted in support of the planning application consider the effects of the Development during the demolition and construction phase.</p> <p>Chapter 10 'Air Quality' of the ES has acknowledged that following the implementation of an Air Quality and Dust Management Plan (AQDMP) and best practice measures, the construction impacts in regard to dust and odours should be mitigated. The measures proposed to reduce dust construction effects include, locating machinery and dust causing activities as far away as possible from sensitive receptors and erect solid screens around dusty activities at least as high as any stockpile on the Site. In addition, during the construction phase the Development will seek to ensure all on road vehicles comply with the London Low Emission Zone and avoid the use of diesel- or petrol-powered generators where possible. Following the implementation of these measures, in addition to the others set out within Chapter 10 'Air Quality', the assessment has identified the construction phase of the Development would not have a significant impact on air pollution.</p>	Positive ✓ Negative Neutral Uncertain	Mitigation Measure: CEMP and an Air Quality and Dust Management Plan to be secured by a planning condition and implemented throughout the construction phase. Planning conditions to be attached to the permission to ensure plant such as heating and cooling units operate to acceptable standards, on	The Development has been subject to technical assessments which have concluded that no significant effects are anticipated during the construction phase in relation to air quality and noise emissions. Thereby the Development complies with Policy 7.14 and 7.15 where the works would not lead to further deterioration of existing air

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
		<p>Chapter 11 'Noise' of the ES assessed the effect the Development would have on the environment in respect to noise. The assessment identified mitigation measures that would reduce the effect of the Development in terms of noise. These measures included the careful orientation of equipment and excavation work sites to reduce noise emissions and where possible, noisy plant should not be used simultaneously and/or close together to avoid cumulative noise effects. Chapter 11 'Noise' identified that following the implementation of an appropriate CEMP which will include the above methods in addition to other mitigation measures and best practice measures, the construction phase of the Development would have a negligible effect on sensitive receptors for in respect of vibration and noise associated with the change in traffic flows and machinery due to construction activities.</p> <p>The Sustainability Statement submitted in support of the planning application details the approach to selecting construction materials and procurement. The Sustainability Statement confirms that the Applicant will avoid the use of materials which have the potential to impact on human health, such as building materials that produce Volatile Organic Compounds.</p>		completion of the Development.	quality levels and avoiding significant adverse noise impacts on health and quality of life, respectively.
Does the proposal minimise air pollution caused by traffic and energy facilities?	Yes ✓ No N/A	<p>The Village Square, adjacent to Block A in the south-eastern corner of the Site, is an inherent mitigation measure included in the design of the Development as it increases the distance between residential receptors within Block A of the Development and the road traffic emission sources on Roehampton Lane. In addition, the landscaping of Village Square will soften the impact of noise and air emissions from the traffic along Roehampton Lane by absorbing/blocking the reach of these emissions to the residents of Block A.</p> <p>Roehampton Lane is a source of air quality pollution from</p>	Positive ✓ Negative Neutral Uncertain	Mitigation Measure: Air Quality and Dust Management Plan to be secured by a planning condition and implemented throughout the	The Development has been designed to be compliant with the Mayor of London's Be Lean, Be Clean and Be Green initiative to improve

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
		<p>the traffic levels the road experiences. Blocks M, K2, N2, N3 and O front Roehampton Lane, however the design evolution of the Development has determined that orientating the footprint of these blocks away from Roehampton Lane, will lessen the impact the pollutants generated from Roehampton Lane will have upon the residents of these blocks.</p> <p>In addition, the Development includes the planting of 750 new trees site-wide to comply with the Mayor's commitment of increasing tree canopy cover by 10% in London by 2050. This comprehensive new tree planting strategy significant increases the tree numbers across the Site and along Roehampton Lane which enhances the amenity value of the area and provide a level of 'freshness' in air quality by separating Roehampton Lane to the residents using the Site. The tree species identified to use along Roehampton Lane are of medium size that have the ability to capture air pollution, such as particulate matter as well as tolerating a short period of flooding. The tree species identified for this use are Frans Fontaine, Magnolia Kobus and alnus glutinosa as well as other similar species which are well known for being great pollution eaters as well as being attractive trees. Along with the enhanced tree planting, other soft landscaping materials have been used along the edge of Roehampton Lane to form a buffer from the emissions caused by traffic. Furthermore, door-step play areas provided across the Site are integrated with perimeter planting especially in Blocks N and O which front Roehampton Lane, to help prevent exposure to air pollution from traffic emissions.</p> <p>The Development will also include 20% of car parking spaces (excluding on-street parking) to have Electric Vehicle Charging Points (EVCPs) with a further 20% having the potential for installation of EVCPs in the future which will</p>		<p>construction phase of the Development.</p> <p>Planning conditions to be attached to the permission to monitor air quality and to ensure that acceptable standards are met on completion of the Development.</p> <p>Travel Plans have been prepared for the residential elements of the Development to encourage the use of sustainable transport methods to help reduce air pollution.</p> <p><u>Enhancement measure:</u> Electric charging points for bikes.</p>	<p>London's air quality. The Development has been subject to a Air Quality Assessment and Energy Strategy to ensure the Site is 'air quality neutral'. The assessments undertaken have shown that there would be a reduction in CO₂ emissions, therefore the Development is compliant with Policy 7.14.</p>

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
		<p>provide opportunities to reduce air pollution from vehicle emissions.</p> <p>In addition, the streets of the Development have been carefully designed to be permeable by foot and cycle, whilst ensuring they connect to the wider public transport network to discourage the future residents and users of the Site of using private vehicles and thereby reduce the number of vehicles within the local area and LBW. To support this movement, the Development provides cycle provision that exceeds the requirements of the Draft London Plan, whilst improving travel by bus through improving the existing bus stops on Danesbury Avenue including a new bus stand/turnaround to improve bus journey times.</p> <p>Chapter 10 'Air Quality' of the demonstrated that the number of predicted vehicle trips generated by the Development are approximately 82% below the benchmark requirements of the London Plan's Supplementary Guidance on 'Sustainable design and Construction'²². The assessment concluded that once the completed Development is operational, the changes in particulate matter would be negligible and the predicted concentrations of nitrogen dioxide would be below the relevant objectives. Therefore, the Site has been assessed as suitable for the proposed mixed-use Development.</p> <p>The current background concentrations of particulate matter and nitrogen dioxide are below the relevant objectives, albeit that LBW have a borough wide AQMA. Through the measures included in the Development, it is not anticipated that there will be significant changes to air quality and thereby, human health is not considered to be significantly</p>			

²² GLA (2014) *Supplementary Planning Guidance on Sustainable Design and Construction*.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
		<p>effected.</p> <p>The Energy Strategy submitted in support of the planning application confirms that the Development has been designed to comply with the objectives of the energy hierarchy: Be Lean, Be Clean, Be Green. The Development will comprise a site-wide health network, served by a single energy centre with a low-carbon generation heat source and will be designed in accordance with the District Heating Manual for London. This approach will supply energy efficiently and will reduce regulated CO₂ emissions by 29.68% over the Target Emission Rate (TER) Approved Document Part L (2013) (AD L 2013).</p> <p>In addition, solar photovoltaics will be supplied across the Development to achieve the minimum on-site target for CO₂ emissions reduction for the non-domestic space of the Development. In addition, passive measures such as energy-efficient building fabric, low-energy lighting and double-glazed windows will also be adopted to contribute to reducing CO₂ emissions. Furthermore, the Development will achieve the zero-carbon homes standard in full through a carbon-offset payment system.</p> <p>Therefore, the Energy Strategy demonstrates that the design approach of the Development and through Be Lean, Be Clean and Be Green measures the Development will achieve a total reduction in regulated CO₂ emissions of 37.33% over the TER AD L 2013.</p> <p>Overall, it is considered that the proposed measures to ensure that the energy facilities and traffic emissions minimise air pollution generate a positive health effect by improving the physical conditions of the Site.</p>			
Does the proposal	Yes ✓	As mentioned above, Chapter 11 'Noise and Vibration' of the	Positive ✓	Mitigation	The

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
minimise noise pollution caused by traffic and commercial uses?	No N/A	<p>ES has assessed the Development in respect to noise. The Development has been designed to incorporate double glazed windows and supplementary ventilation systems which will reduce noise levels within the residential dwellings, proposed children's centre and library on the Site to appropriate levels. Thus, the assessment concluded that the predicted noise levels to be generated from the operational phase of the Development would have a negligible residual effect on users of the Site.</p> <p>The detailed landscaping strategy for the Development has included landscape buffering along Roehampton Lane and internal streets to form a defensive barrier to prevent noise emissions projecting through the Site and causing disturbance to the future residents of the Site. The Noise assessment showed that the effects of the Development on traffic noise specifically along Roehampton Lane would increase by a maximum of 0.1dB(A). Together with the detailed landscape buffering edging Roehampton Lane, the residents of the units fronting Roehampton Lane and users of this area of the Site should not experience significant changes in noise levels and thus, should not be disturbed, thereby generating a positive health effect. The largest change in noise levels is predicted to be along Harbridge Avenue with an increase of 1.4dB(A), located within the Site boundary. Through mitigation measures such as the careful design of the building fabric to ensure the appropriate design targets are complied with, which can be secured through a planning condition, disturbance from noise emanating from traffic should not be significant, thereby the health of the residents should not be negatively effected.</p>	Negative Neutral Uncertain	<p><u>Measure:</u></p> <p>Appropriate conditions will be attached to the planning permission to ensure suitable noise levels from plant associated with the commercial buildings.</p>	<p>Development has been subject to a Noise Assessment undertaken by a competent expert who has offered design measures to be incorporated into the Development to ensure no significant adverse effects arise as a result of the Development and thus, comply with Policy 7.15.</p>

5. Accessibility and Active Travel

5.6 Physical activity through active travel measures, such as walking and cycling can encourage healthy growth and development, maintain a healthy weight and reduce anxiety and stress. Measures to promote active travel are also important to discourage the use of private cars which also eases traffic pressures on local highway networks.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
Does the proposal prioritise and encourage walking (such as through shared spaces?)	Yes ✓ No N/A	<p>The Development seeks to promote and encourage walking across the Site through connecting the open space areas that will be provided, as well as designing the residential and commercial spaces to be as permeable as possible.</p> <p>The Development will provide 5 main strategic green links to access Putney Heath, Roehampton playing fields, Richmond Park and Palewell playing fields which will promote walking to these areas from the Site. Four of these strategic green links are existing connections which the Development will seek to maintain and enhance. The fifth strategic green link is proposed for a potential future link to Richmond Park which would provide a more direct route from the Site.</p> <p>The existing pedestrian network will be enhanced to maintain and improve the permeability and access to the surrounding communities of Alton, Roehampton and Putney.</p> <p>All open space area provided on the Site will be designed to be accessible to all.</p> <p>The streets have been designed to be safe for pedestrian use with strategic soft landscape features to make them attractive to use. This also applies for the use of lighting</p>	Positive ✓ Negative Neutral Uncertain	<u>Recommended Enhancement Action:</u> Travel Plans have been prepared for the commercial and residential elements of the Development. The residential Travel Plan welcome pack could include a section on safe walking routes to local parks and green spaces to encourage physical and mental wellbeing.	The Development has been designed to ensure the streets provided are permeable, attractive and safe to use to encourage walking throughout the Site, thus complying with Policy 6.10.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
		<p>at night time, which has been carefully designed to discourage anti-social behaviour and thus, ensure the Development encourages walking at all times.</p> <p>Public squares have been integrated to encourage walking and assist in navigating through the Site. The measures included in the design of the Development comply with the Active Design principles by providing high quality and safe pedestrian footways throughout the Site, thereby creating a positive health effect.</p> <p>The provision of high-quality, safe pedestrian walkways throughout the Site that connect with the wider network will promote the use of these features instead of using private vehicles. By encouraging walking throughout the Site and the wider area, the general activeness of the future residents and public will increase, thereby encouraging good health.</p>			
Does the proposal prioritise and encourage cycling (for example by providing secure cycle parking, showers and cycle lanes)?	Yes ✓ No N/A	<p>The Development will provide adequate facilities to encourage cycling to the Site, including the provision of 2,100 cycle parking spaces for the residential element and 139 cycle parking spaces for the non-residential element. The cycle spaces will be provided across the Site which will encourage users and residents of the Site to cycle. In addition, the parking provision has been designed in line with Transport for London's requirements where 95% of the provision should be double stacker's and 5% as space for larger bikes. Therefore, the Development incorporates provision for cargo bikes, which provides opportunities for parents with small children to travel via cargo bikes across the site to access all the services the Development will provide.</p> <p>The layout of the Development has carefully considered vehicular, cycle and pedestrian movement around the Site,</p>	Positive ✓ Negative Neutral Uncertain	N/A	The Development provides cycle parking and cycle paths across the Site as well as providing links to the wider cycle network in London, therefore the Development complies with Policy 6.9.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
		<p>to encourage cycling across the Site and into the surrounding areas of Richmond Park, Alton, Roehampton and Putney. The Development will also remove on-street parking on Danebury Avenue to improve the route for cycling. Across the Site, the Development will ensure all the streets are to be made permeable by foot and cycle.</p> <p>By providing the facilities required for safe and accessible cycling measures which the Development will provide, will encourage future residents to cycle instead of using private cars to make local trips. Thereby, encouraging a more active lifestyle which will have improvements on the general health of the future residents.</p>			
Does the proposal connect public realm and internal routes to local and strategic cycle and walking networks?	Yes ✓ No N/A	<p>As described earlier, the Development will seek to maintain the existing connections with the surrounding communities and open spaces to Richmond Park, Putney Heath and Roehampton playing fields. The Development will provide 5 main strategic green links to access the surrounding public realm. These include Roehampton Playing Fields (to the east), Putney Heath (to the south-east), two links to Richmond Park (to the south-west/west) and Palewell Playing Fields.</p> <p>The Development will seek opportunities to provide a strategic link to Richmond Park from the Site which comprises a series of walking networks, including the Beverley Brook Walk and Capital Rink, as well as cycle routes.</p> <p>The access provided by the Development to these cycle and walking networks will allow the users to also access the wider cycle and walking network along the River Thames, located to the north of the Site. The provision of cycle and walking networks within the Site and the connections to the wider networks promotes healthy living,</p>	Positive ✓ Negative Neutral Uncertain	N/A	As above.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
		thereby creating a positive health effect.			
Does the proposal include traffic management and calming measures to help reduce and minimise road injuries?	Yes ✓ No N/A	<p>Chapter 9 'Transport and Access' of the ES, submitted in support of the planning application details the improvements that will be made to the local highway network to help reduce road injuries and thus, improve safety. During the construction phase of the Development, a Construction Logistics Plan (CLP) and a CEMP will be implemented, as well as temporary traffic management works to mitigate and reduce road injuries.</p> <p>The Development includes highway improvements to the junction between Danebury Avenue and Roehampton Lane including an additional lane on Danebury Avenue approach to assist in calming traffic and reduce road injuries. All streets will feature traffic calming measures to ensure safety throughout the Site. During the operational phase of the Development, s278 agreements will be sought to secure appropriate working methods for highway works including traffic management arrangements.</p>	Positive ✓ Negative Neutral Uncertain	<u>Mitigation action:</u> S278 agreements for future highway works during the course of the Development.	The Development has been designed to provide highway improvements to ease the traffic congestion currently experienced on the local road network and thus, comply with Policy 6.11.
Is the proposal well connected to public transport, local services and facilities?	Yes ✓ No N/A	<p>The Site already benefits from connections with public transport, local services and facilities. Public transport access to the Site is mainly by bus, with rail services a cycle or bus journey away. The area is served by six bus services providing 5-8 services per hour, per route, per direction.</p> <p>The local bus network is understood to be well-used and has been identified to be of high sensitivity. The addition of the trips anticipated to be generated by the Development on the local bus network has the potential to perceptibly affect perceptions of delays for travel by bus with the potential to change travel behaviour to some degree. However, the Development has been designed to include an additional bus stop and new bus stands on Danebury Avenue.</p>	Positive ✓ Negative Neutral Uncertain	<u>Mitigation action:</u> Financial contributions secured through s106 agreements.	The existing Site benefits from connections with public transport, local services and facilities. The redevelopment of the Site seeks to retain the existing connections and enhance these to comply with Policy 6.11.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
		<p>In addition, Chapter 9 'Transport and Access' of the ES has identified that a contribution towards enhanced bus services if required following engagement with Transport for London will secure additional capacity to accommodate the additional demand arising from the Development. Providing this additional capacity will encourage the new residents of the Development and the existing residents in the surrounding area to continue to use the local bus network and discourage private car use. Therefore, providing a positive health effect.</p>			
Does the proposal seek to reduce car use by reducing car parking provision, supported by the controlled parking zones, car clubs and travel plans measures?	Yes ✓ No N/A	<p>Travel Plans have been prepared for the residential and commercial aspects of the Development with the primary aim of minimising single occupancy car travel. The proposed measures to achieve this include providing information via a welcome pack to future users and residents of the Development about alternative means of travel, ensuring sufficient cycle parking, and providing clear and convenient cycle and pedestrian access to the Site.</p>	Positive ✓ Negative Neutral Uncertain	<p><u>Mitigation Action:</u> A Welcome Pack to the future residents of the Site which details alternative measures that can be used instead of private car use. The success of the Travel Plans should be monitored against clearly defined targets. If the targets are not being met then measures will be</p>	<p>The Development promotes the use of public transport and provides pedestrian and cycle paths to reduce private car use, thereby achieving compliance with Policy 6.11.</p>

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
				reviewed and amended to step up the effectiveness of the measures. Such measures would need to be agreed with LBW's Travel Plan Officer.	
Does the proposal allow people with mobility problems or a disability to access buildings and places?	Yes ✓ No N/A	<p>The Development has ensured that wheelchair accessible spaces have been located as close as feasible to the blocks serving wheelchair accessible properties. A minimum provision of 5% of total car parking spaces will always be marked as accessible spaces with at least one wheelchair accessible space per block for use by blue badge holders. The Development will also provide 6 disabled parking bays on-street, which would be 'shared use' bays used for loading and disabled parking.</p> <p>Furthermore, the Development is permeable for all to access with interconnected internal roads throughout the commercial, retail, communities and leisure and residential space. All the main entrances for each part of the Site have been designed to be accessible to every occupant. In addition, a key vehicular link will be provided for all to access the public realm and open space provided across the Site.</p>	Positive ✓ Negative Neutral Uncertain	N/A	The Development has been designed in accordance with policy 6.13 to ensure sufficient amount of disabled parking is provided on the Site as well as ensuring that every part of the Site is accessible to all needs.

6 Crime Reduction and Community Safety

5.7 Community safety is a concept that is concerned with achieving a positive state of well-being among people within social and physical environments. Not only is it about reducing and preventing injury and crime, it is about building strong, cohesive, vibrant, participatory community.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
Does the proposal incorporate elements to help design out crime?	Yes ✓ No N/A	The design of the Development has been specifically designed to deter crime and antisocial behaviour. Security concerns have addressed by utilising Secured by Design principles, including active frontages and well-lit spaces to discourage crime across the Site. The Design and Access Statement (DAS) submitted in support of the planning application provides the details for how the design of the Development will reduce crime and anti-social behaviour on the Site.	Positive ✓ Negative Neutral Uncertain	N/A	By utilising the Secured by Design principles within the design process, the Development complies with Policy 7.3.
Does the proposal incorporate design techniques to help people feel secure and avoid creating 'gated communities'?	Yes ✓ No N/A	The Development has been designed to split the Site into defined character areas, each with their own identity and characteristics to help the users of the Site to feel secure. The Development has been designed to ensure that the entirety of the Site is permeable for all and avoid the creation of 'gated communities'. The Applicant recognises that the Site is located within a strategic area where the Development will become a new focal point for the areas of Alton West, Alton East and Roehampton. Therefore, the design process for the Development has ensured that the design techniques used in the Development promote a friendly and secure new community. The DAS submitted in support of the planning application provides the detail for the techniques used in the design of the Development to ensure a secure, friendly environment.	Positive ✓ Negative Neutral Uncertain	N/A	As above. In addition, the Development has sought to create a new community that is inclusive to every member of the public to comply with Policy 7.2.
Does the proposal	Yes ✓	The Development has been through a design process that	Positive ✓	N/A	The

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
include attractive, multi-use public spaces and buildings?	No N/A	has involved key consultation with stakeholders, technical consultants, the local community and with LBW to ensure attractive, multi-use public spaces and buildings will be provided. The DAS submitted in support of the planning application sets out the design details for the public spaces and buildings. Careful consideration has been given to the type of materials used for the buildings, as well as the balance between soft and hard landscaping techniques to produce attractive public spaces.	Negative Neutral Uncertain		Development is of high-quality design to provide an attractive new community that offers a range of services to support the local needs of the area, thereby the Development complies with Policy 3.5.
Has engagement and consultation been carried out with the local community?	Yes ✓ No N/A	The Statement of Community Involvement submitted in support of the planning application details the extensive public exhibition, workshops and consultation process the Development has undergone that has influenced the final design. A public exhibition was held in Roehampton Library in September 2017. Consultant-led workshops were held throughout September 2017. Open sessions at Roehampton Parish Hall were held in September and October 2017. More open sessions were provided in June 2018 which were followed up by pop-up exhibitions held across four dates in June 2018 in a range of locations. The Applicant attended the "Get Active" Roehampton Festival in September 2018 where the updated information on key aspects of the Development that had changed since the June consultations were presented. Meetings were undertaken with a number of local community groups that ranged from faith groups to local businesses. Included was a separate consultation session that was set up for the residents of Tunworth Crescent in November 2018. Feedback from all these sessions was taken into account	Positive ✓ Negative Neutral Uncertain	Mitigation Measure Continued public consultation and engagement with the future Reserved Matters applications.	The Development has been through a process of public consultation events and stakeholder engagement as identified within Policy 3.7 for large residential developments.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
		and reflected in the design evolution of the Development.			

7. Access to Healthy Food

5.8 Access to healthy food corresponds with a good diet, lower risk of obesity and other diet-related chronic diseases. In addition, without access to healthy food such as local grocery stores and other food retailers, communities are missing the commercial viability that makes neighbourhoods liveable and helps local economies thrive.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
Does the proposal facilitate the supply of local food, i.e. allotments, community farms and farmers' markets?	Yes ✓ No N/A	<p>The Development will provide 3,042sqm of flexible commercial floorspace of A1-A5, B1 and D1 uses, increasing the quantum and quality of the existing commercial floorspace on the Site. The Development seeks to replace the existing commercial floorspace with providing an uplift in floorspace. As part of this provision, a new convenience food store will be delivered on the ground floor between Danebury Avenue and Roehampton Lane. In addition, a small convenience store will also be provided at Portswood Place. Therefore, the Development does provide an opportunity to supply local food to the Site.</p> <p>The existing Site does not include allotment provision and the proposals do not include any allotment provision either, therefore there is no deficiency caused by the Development. The closest allotment site to the Site is Hertford Avenue allotments, located approximately 2km from the Site (approx. a 20 minute walk). However, there is a five year waiting period for an allotment at Hertford Avenue, thus the future residents of the Site will have a delay in accessing an allotment space to grow their own food which limits the potential for healthy eating via home-grown organic food.</p> <p>The Development does not include a Farmer's Market at</p>	Positive Negative Neutral ✓ Uncertain	N/A	Policy 7.22 recognises the importance of protecting existing land for food but also identifying new areas for food production or community gardening. The Development does not provide allotment provision, neither does it remove any.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
		this current stage, however the Village Square has been designed to accommodate a potential Farmer's Market with easy access and strategic landscaping. If LBW considered a Farmer's Market could be held in this location, then the Development would provide an opportunity to host such an event.			
Is there a range of retail uses, including food stores and smaller affordable shops for social enterprises?	Yes ✓ No N/A	As mentioned above, the Development will provide two new convenience food stores that will provide an opportunity for smaller affordable shops to be provided on the Site for the future users of the Development.	Positive ✓ Negative Neutral Uncertain	<u>Recommended Enhancement Action:</u> Consider committing some of the proposed commercial floorspace for social enterprises.	The Development will provide small shops as part of the retail element and thus, comply with Policy 4.9 to support affordable shop units suitable for small or independent retailers.
Does the proposal avoid contributing towards an over-concentration of hot food takeaways in the local area?	Yes ✓ No N/A	The Site currently comprises a total of 3,256sqm of existing commercial floorspace (Use Classes A1-A5, sui generis and B1) which comprises a range of services, including fast food takeaways. The Development is a regeneration of the existing Site and will provide 3,402sqm of new flexible retail floorspace of A1-A5, B1 and D1 uses, therefore the existing fast food takeaways will be removed as part of the construction and demolition phase of the Development. The retail floorspace to be provided on the Site is currently flexible in the uses proposed and could possibly provide fast food takeaways. However, the Development will avoid contributing towards an over-concentration of hot food takeaways on the Site.	Positive Negative Neutral Uncertain ✓	<u>Recommended Mitigation Action:</u> When selecting tenants for commercial floorspace, consider proposed use and potential for adverse effects on health.	The London Plan has no specific policies regarding the provision of takeaways.

8. Access to Work and Training

5.9 The opportunities for employment has a positive health effect, as work contributes to our happiness, helps build confidence and self-esteem and rewards us financially which also allows individuals to explore other interests. Both physical and mental health are generally improved through work, where there are opportunities to be challenged, socialise, build contacts and find support in the local community.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliance with the London Plan?
Does the proposal provide access to local employment and training opportunities, including temporary construction and permanent 'end-use' jobs?	Yes ✓ No N/A	<p>Chapter 6 'Population and Human Health' of the ES submitted in support of the planning application details the effect the Development has on employment. The Development will create approximately 242 full time equivalent jobs per month during the construction phase between 2020 and 2030, directly related construction jobs. A further 215 indirect jobs per month are anticipated during the 10-year construction period.</p> <p>The Equality Impact Assessment submitted in support of the planning application has identified that a disproportionate share of the local population belongs to black and minority ethnic groups (BAME communities) when compared to the wider LBW. The construction employment and training opportunities could potentially have a disproportionately positive effect on BAME communities. In addition, the planning application will be accompanied by an Employment and Skills Strategy, which will set out specific ways of ensuring that the unemployed residents are given priority access to both construction jobs and permanent jobs generated by the Development. However, it should be noted that 13.5% of the households within the area were occupied by single parents with children who are dependent on that parent. Therefore, work associated with the construction activities may not</p>	Positive ✓ Negative Neutral Uncertain	<u>Recommended Enhancement Action:</u> Commit to sourcing construction workforce from the local area where possible. Consider whether any apprenticeship positions could be provided.	The Development includes the provision of commercial, retail and community floorspace to provide employment opportunities to the future residents of the Site and surrounding area, thus the Development complies with Policies 2.14, 4.12 and 7.1.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliance with the London Plan?
		<p>appeal or be practical for the residents who are single parent households.</p> <p>The Site comprises of 9,339sqm of existing non-residential floorspace, of which only 7,329sqm of the existing 9,339 sqm non-residential floorspace is currently in-use. The Development will replace the existing non-residential floorspace on the Site and will also provide new retail, employment and community facilities which will total 9,572sqm of the Site. Through the increase in proposed floorspace of A1-A5, B1 and D1 uses, the Development will naturally increase employment in the local area. The net additional 2,243sqm of retail, commercial and community floorspace provided by the Development is anticipated to provide between 243 and 296 FTE jobs. Thus, the Development will provide between 50 and 59 net additional FTE jobs in comparison to existing employment levels on the Site, as identified within Chapter 6 'Population and Human Health' of the ES.</p> <p>The net increase in jobs generated by the Development will also positively contribute to the 120 residents in Roehampton currently claiming job seeker allowance, as identified within Chapter 6 of the ES. Therefore, the regeneration of Alton Estate is anticipated to have a minor beneficial effect on employment which is considered to have a positive health effect specifically due to the benefits the Development will have which will improve the current deprivation levels currently experienced in the Site and surrounding areas.</p>			
Does the proposal provide childcare facilities?	Yes ✓ No N/A	Currently, only 4,073sqm of the existing 6,083sqm of community floorspace is in-use. The Development will provide 5,527sqm of new and replacement community floorspace, a large proportion of which will be used for Eastwood Nursery and children's centre at Portswood	Positive ✓ Negative Neutral Uncertain	N/A	The Development provides new and replaced community

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliance with the London Plan?
		Place.			floorspace which will in part be used for childcare facilities which complies with Policy 3.18.
Does the proposal include managed and affordable workspace for local businesses?	Yes ✓ No N/A	Only 7,329sqm of the existing 9,339 sqm non-residential floorspace is currently in-use. As mentioned above, the Development will provide a net additional 2,243sqm of in-use retail, community and commercial floorspace (A1-A5, B1 and D1 uses) from the existing provision on the Site. The provision of this increased retail, commercial and community floorspace is to ensure a continuity and enhancement of employment and thus providing floorspace for local businesses.	Positive ✓ Negative Neutral Uncertain	<u>Recommended Enhancement Action:</u> Consider whether any commitment could be made to affordable rents for local businesses.	The Development includes the provision of commercial, retail and community floorspace to provide employment opportunities to the future residents of the Site and surrounding area, thus the Development complies with Policies 2.14, 4.12 and 7.1.
Does the proposal include opportunities for work for local people via local procurement arrangements?	Yes ✓ No N/A	As mentioned previously, the Development includes a variety of employment floorspace on the Site which could provide opportunities for work for local people via local procurement arrangements.	Positive Negative Neutral Uncertain✓	<u>Recommended Enhancement Action:</u> Consider whether any commitment could be made	As above.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliance with the London Plan?
				to employment opportunities for local people.	

9. Social Cohesion and Lifetime Neighbourhoods

5.10 Relationships are important for physical health and psychological well-being. High levels of social support can positively influence health outcomes through behavioural and psychological pathways and prevent social isolation.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
Does the proposal connect with existing communities, i.e. layout and movement which avoids physical barriers and severance and land uses and spaces which encourage social interaction?	Yes ✓ No N/A	The Development seeks to maintain the current uses and character of the Site but provide enhancement features to improve its facilities and opportunities. The mixed-use Development will become a new focal centre of three existing communities (Alton West, Alton East and Roehampton). The design of the Development has gone through extensive consultation to ensure the layout and routes through the Development will connect with the existing communities, avoid physical barriers and encourage social interaction.	Positive ✓ Negative Neutral Uncertain	N/A	The Development seeks to retain the existing uses and connections the Site already benefits from but enhance these to regenerate the area to improve the quality of life of the existing residents and surrounding communities. The Development has been designed to ensure the entirety of the Site is permeable to all and encourage a community feeling, thus the Development

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
					complies with Policy 7.1.
Does the proposal include a mix of uses and a range of community facilities?	Yes ✓ No N/A	A total of 5,527sqm of community floorspace, 87,692sqm of total open space, 3,402sqm of A1-A5, B1 and D1 use floorspace and 643sqm of B1 floorspace will be provided across the Site, therefore provide a mix of uses and a range of community facilities.	Positive ✓ Negative Neutral Uncertain	N/A	As above, the Development seeks to retain the existing uses on the Site and enhance these features to provide a range of services that supports the local needs. The Development has been designed to comply with Policy 7.1 to achieve the delivery of a Lifetime Neighbourhood.
Does the proposal provide opportunities for the voluntary and community sectors?	Yes ✓ No N/A	As mentioned above, the Development provides opportunities for the voluntary and community sectors by the provision of 5,527sqm of community floorspace.	Positive ✓ Negative Neutral Uncertain	N/A	As above.
Does the proposal address the six key components of Lifetime Neighbourhoods?	Yes ✓ No N/A	The Development does address the six key components of Lifetime Neighbourhoods.	Positive ✓ Negative Neutral Uncertain	N/A	As above.

10. Minimising the Use of Resources

5.11 The extraction and consumption of natural resources disrupts the environment and creates pollution. Reducing the use of natural resources, such as fossil fuels and wood products, will protect human and environmental health.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
Does the proposal make best use of existing land?	Yes ✓ No N/A	<p>The Development seeks to redevelop the existing Site whilst still maintaining the residential and employment uses. The Site is located within an area exhibiting high levels of deprivation and unemployment compared to the rest of LBW and London, as well as low levels of educational attainment and public health problems which is affecting the quality of life of the existing residents. Consequently, there is an increasing strain on services and public expenditure. Without intervention, the quality of life of the current residents and the associated current issues will continue to deteriorate.</p> <p>The Development therefore looks to enhance the opportunities already existing on the Site and improve the physical environment, raise the aspirations and improve the life chances of those living in the most deprived areas of LBW.</p> <p>Furthermore, the existing open space areas on the Site will be retained and enhanced to make it more of an attractive area for the surrounding communities to use.</p> <p>The Development will maintain the character and uses of the Site and enhance these to improve the quality of life for the existing residents and create a high quality and vibrant mixed-use development that will build on the history of the area, therefore making the best use of the existing land.</p>	Positive ✓ Negative Neutral Uncertain	N/A	LBW have identified the Site as within an area needed for regeneration as shown in the baseline assessment in Section 3 of this HIA. Therefore, the Development seeks to retain the existing land uses on the Site and enhance these to improve the quality of life for the existing and future residents of the Site, in addition to the surrounding areas. Thus, the Development complies with Policy 2.14.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
Does the proposal encourage recycling (including building materials)?	Yes ✓ No N/A	A Waste Strategy and Framework Site Waste Management Plan have been produced and submitted with the planning application. Dedicated refuse and recycling stores have been set aside as part of the individual designs to accommodate 70 litres per household for mixed recyclables. The design of each block ensures that the recycling stores are either 10m dragging distance of a safe stopping point for collection vehicles or than an allocated hardstanding area is set aside to move bins onto for collection days. Therefore, these provisions as part of the Development encourage recycling across the Site for all future residents and users of the Site.	Positive ✓ Negative Neutral Uncertain	N/A	The Development provides refuse and recycling facilities across the Site to encourage recycling, therefore the Development complies with Policy 5.16.
Does the proposal incorporate sustainable design and construction techniques?	Yes ✓ No N/A	A CMP and CLP will be prepared to ensure that the best practice measures are incorporated into the Development. These two plans will detail the design and techniques that will be adopted during the construction phase and will set out how the Development meets the planning policy requirements related to sustainable development.	Positive ✓ Negative Neutral Uncertain	N/A	The Development has been subject to a CMP and CLP which details the sustainable design and techniques to be implemented and to comply with Policy 5.3.

11. Climate Change

5.12 Climate change can affect human health directly through death/injury in floods/hurricanes and indirectly through changes in the ranges of disease vectors, water-borne diseases, water quality, air quality and food availability.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
Does the proposal incorporate renewable energy?	Yes ✓ No N/A	<p>The design of the Development has taken into account the Be Lean, Be Clean, Be Green strategy and an Energy Statement has been prepared for the Development.</p> <p>It has been identified within the Energy Statement that, on a Development like this, the only feasible renewable energy systems would be solar photovoltaic cells as a source of renewable energy. Therefore, approximately 1,366 x 250-watt panels or roof area of 2,268sqm positioned at a southerly orientation and a 30-degree pitch will be delivered on the non-domestic elements of the Development to comply with CO₂ emission targets.</p> <p>In addition, Air Source Heat Pumps will be installed for the mechanical cooling of all non-domestic areas.</p>	Positive ✓ Negative Neutral Uncertain	N/A	The Development has been designed in accordance with the Mayor of London's Be Lean, Be Clean, BE Green initiative and identifies that solar photovoltaic cells can be incorporated into the Development and thus to comply with Policy 5.7.
Does the proposal ensure that buildings and public spaces are designed to respond to winter and summer temperatures, i.e. ventilation, shading and landscaping?	Yes ✓ No N/A	<p>The Energy Statement includes an assessment of the Development with regard to temperatures and ventilation. Through the inclusion of the following design measures, the Development will reduce regulated CO₂ emissions by 3.14%:</p> <ul style="list-style-type: none"> • Energy-efficient building fabric and insulation to all heat loss floors, walls and roofs; • High-efficiency double-glazed windows throughout; • Quality of build will be confirmed by achieving good air-tightness results throughout; • Efficient-building services including high- 	Positive ✓ Negative Neutral Uncertain	N/A	<p>The Development has been designed to produce a reduction in CO₂ emissions to comply with Policy 5.2.</p> <p>The London Plan doesn't have any specific policies relating to</p>

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
		<ul style="list-style-type: none"> efficiency community heating systems and ventilation systems; and Low-energy lighting throughout the buildings. <p>The access to daylight and sunlight is a key aspect to mental health well-being, as the amount of direct sunlight one receives can affect your mood, alertness, productivity, sleep patterns etc which all contributes to somebody's mental well-being.</p> <p>The design of the Development has sought to ensure that the majority of units provided under the detailed element of the Development are dual or triple aspect with no single aspect north facing units. The 54% of units provided under the detailed element of the Development are dual aspect or triple aspect and there are no single aspect north-facing units:</p> <ul style="list-style-type: none"> Block A – 100% dual (40/40 units); Block M – 50.4% dual (54/107 units); Block O – 50% dual (20/40 units); Block K – 43.4% dual (100/230 units); Block N – 47.9% dual (58/121 units); and Block Q – 69.8% dual (81/116 unit). <p>There are a limited number of north-facing single aspect units within Block K, which have been mitigated through the use of recessed balconies with flank wall glazing providing direct sunlight to the interior. Therefore, the Development has sought to comply with Policy DMH4 of LBW's Development Management Policies document.</p> <p>In addition, the Development has been subject to an Internal Daylight and Sunlight Assessment which has been submitted in support of the planning application. The results from this assessment has shown that 87% of the 2,021 rooms meet or exceed BRE recommendations</p>			<p>daylight, sunlight access. However, The design of the Development has closely considered LBW's Policy DMH4 to ensure there is compliance in respect of dual aspect provision.</p>

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
		<p>for daylight quantity. In addition, 74% of the living areas with a southerly aspect enjoy good access to sunlight over the whole year and 78% of the living areas with a southerly aspect have good access to sunlight during the winter months. The outline element of the Development generally does provide good daylight and sunlight potential. The masterplan layout of the Development has evolved to introduce breaks into the building frontage to allow better exposure to the sun. The assessment concludes that the Development will offer good levels of daylight across the Site throughout the year. Providing good levels of sunlight across the Site will have a positive health effect on the future residents of the Development by improving their mood and outlook on day-to-day lift, thus promoting positive mental health.</p> <p>The Daylight and Sunlight assessment also assessed the impact the Development will have upon neighbouring properties outside of the redline boundary for the Site. Measures were included in the design evolution of the Development including massing alterations to minimise the impacts on daylight to surrounding properties as much as possible. 51 properties in the surrounding areas to the Site were assessed to potential experience change in terms of daylight, sunlight and overshadowing. The assessment found the following:</p> <ul style="list-style-type: none"> • Daylight: <ul style="list-style-type: none"> ○ Negligible effects to 39 properties; ○ Minor adverse effects to 7 properties; ○ Moderate adverse effects to 4 properties; and ○ Major adverse effect to 1 property. • Sunlight: <ul style="list-style-type: none"> ○ Negligible effects to 30 properties; ○ Minor adverse effects to 1 property; and ○ Moderate adverse effects to 5 properties. 			

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
		<ul style="list-style-type: none"> • Overshadowing; Negligible effects for all properties. • Light pollution; negligible effects for all properties. <p>The above results show the majority of the properties in the surrounding area should experience little or no change to the existing, thus generating a positive health effect. For the 5 properties experiencing a significant change in daylight and sunlight levels, a negative health effect could be anticipated.</p> <p>Furthermore, the landscaping strategy of the Development has been specifically designed to tolerate the effects of climate change. The tree palette for the 750 new trees to be provided across the Site have been developed in consideration of appropriateness to place, aspect and direct sunlight availability, biodiversity value, longevity and LBW's input. Providing continuous landscaping features throughout the Site helps prevent an 'urban heat island' effect by absorbing the heat from the sun and providing areas of shade for the future residents and users of the Site. Thereby, a positive health effect is anticipated as the Development can respond to changes in temperature and be resilient to climate change.</p>			
Does the proposal maintain or enhance biodiversity?	Yes ✓ No N/A	<p>The Development will provide an uplift of open space already on the Site, totalling 87,692sqm of open space. Therefore, the Development will seek to enhance the existing biodiversity on the Site. In addition, approximately 1.9ha of biodiverse roofs will be incorporated onto Portswood Place to provide a new habitat and enhance the area for biodiversity.</p> <p>Chapter 12 'Biodiversity' of the ES also details the measures proposed to enhance biodiversity across the Site. This includes log piles and biodiversity roofs which</p>	Positive ✓ Negative Neutral Uncertain	<u>Mitigation Action:</u> A Management Plan to be produced and secured via planning condition to ensure the landscape planning and strategy is delivered.	The Development retains the existing open space within the Site but provides measures to enhance these areas to increase biodiversity and thus comply with Policy 7.19.

Assessment criteria	Relevant?	Details/evidence	Potential health impact?	Recommended mitigation or enhancement actions	Compliant with the London Plan?
		has been incorporated into the landscape design of the Development. Specific stag beetle 'loggeries' will be provided in areas which should remain undisturbed. Designated areas such as these across the Site should have interpretation boards or be fenced to provide information for the future residents to understand the biodiversity in their local area and therefore increase awareness.		<u>Enhancement Action:</u> Interpretation boards across the site for designated areas to promote biodiversity across the Site.	
Does the proposal incorporate sustainable urban drainage techniques?	Yes ✓ No N/A	The Development will incorporate Sustainable Drainage System techniques that will comprise green roofs, basins, wetlands, bio-retention areas and ponds, permeable surfaces, rainwater harvesting and tanked systems. Specifically, pavements in various areas of the Site will be designed to drain into areas to assist management of stormwater runoff and reduce reliance on irrigation systems. In addition, the proposed public realm will incorporate a combination of biodiverse planting with sustainable drainage systems, such as bio-retention street planting. Moreover, the majority of roofs on the residential blocks will be biodiverse roofs which will attenuate any rainfall that falls on them. This approach has been confirmed as being acceptable with LBW Head of Engineering Services.	Positive ✓ Negative Neutral Uncertain	N/A	The Development will incorporate Sustainable Drainage System techniques that have been designed to comply with Policy 5.13.

6 OUTLINE MONITORING REPORT

6.1 The Rapid HIA exercise in Chapter 5 of this HIA has identified that the Development will generate positive health effects within LBW. Where recommendations have been made for mitigation or enhancement measures, the outline monitoring plan offers methods to track their delivery.

6.2 The indicative outline monitoring plan at Table 4 is only indicative and provides suggestions to how the mitigation and enhancement measures will be secured.

Table 4: Indicative outline monitoring report

Health Impact	Mitigation/Enhancement measure	Monitoring		
		Activity	Evidence	Timeframe
The Development will provide an uplift of open space already on the Site, totalling 87,897sqm of open space.	A Management Plan to be secured via planning condition.	LBW Building Regulations team to monitor the implementation of the management plan throughout the lifespan of the Development.	Main contractor to provide plans/photos.	On completion of the construction phase and during the operational phase.
Travel Plans that have been prepared for the Development to minimise single occupancy car travel by offering alternative methods of travel.	The success of the Travel Plans should be monitored against clearly defined targets.	LBW Travel Plan Officer to compare the Travel Plan to the evidence provided by the main contractor on site. If the targets are not being met then measures will be reviewed and amended to step up the effectiveness of the measures.	Main contractor to keep a record of on-site movements.	On completion of the construction phase and during the operational phase.
Noise generated during the construction phase.	CEMP to be secured by a planning condition.	Main contractor to monitor noise levels across the Site.	Main contractor to log a record of construction activities.	Throughout the construction phase.
Air pollution generated during the construction phase.	CEMP and Air Quality and Dust Management Plan to be secured by a planning condition.	Main contractor to monitor dust-related activities across the Site.	Main contractor to log a record of construction activities.	Throughout the construction phase.

7 CONCLUSION

7.1 An assessment of the potential health effects of the Development has been undertaken. The HUDU Healthy Urban Planning Checklist has been completed (see Appendix 3) which has helped focus the assessment of effects (set out in Chapter 5) using the HUDU Rapid Health Impact Assessment Tool.

7.2 A review of the baseline conditions of the Site and the surrounding area has been provided within Chapter 4. The Site is located within the area of Alton and Putney Vale which includes areas that are amongst the 20% most deprived neighbourhoods in England. The population of the surrounding areas of the Site have a younger demographic than the rest of LBW. The average life expectancy for both men and women living in Alton and Putney Vale are lower than the LBW's average. LBW launched its Aspirations Programme in 2013 which targets two key areas that are undergoing a programme of regeneration to create more homes, help people to work and encourage healthy lifestyles.

7.3 The performance of the Development has been assessed against 11 key health themes:

- Housing quality and design;
- Access to healthcare services and other social infrastructure;
- Access to open space and nature;
- Air quality, noise and neighboured amenity;
- Accessibility and active travel;
- Crime reduction and community safety;
- Access to healthy food;
- Access to work and training;
- Social cohesion and lifetime neighbourhoods;
- Minimising the use of resources; and
- Climate change.

7.4 As part of the design of the Development, particular attention has been given to creating a balanced, mixed-use community which meets local housing needs and provides employment opportunities. The Development seeks to maintain the current uses on Site by re-providing, yet enhancing the housing, employment, community and open space uses to provide a new focal point for the wider communities of Alton West, Alton East and Roehampton. The design approach of the Development is committed to achieving a total reduction in regulated CO₂ emissions to comply with the overarching strategic objectives as set out in the Draft London Plan by embodying the Mayor of London's Be Lean, Be Clean and Be Green principles. To aid

the Development to comply with the Be Lean, Be Clean and Be Green principles, the Development promotes active and sustainable travel, including attractive and safe cycling and pedestrian facilities that connect to the wider area to discourage private car use and ultimately reduce vehicle emissions. Furthermore, these measures comply with the 'Active Design' principles, to promote active travel and thereby improve the health of the future residents and users of the Site. The Development also includes the enhancement of the large area of open space currently within the Site, and the design team have incorporated multi-use open space throughout the public and private areas which will provide a range of beneficial health effects. It is evident the Development provides the opportunities to establish healthy lifestyles for the future residents and users of the Site.

7.5 Table 5 below outlines the positive health effects that have been identified from the Rapid HIA in Chapter 5 for the Development. Positive effects are forecast for 10 of the 11 health themes. The Site is located within an area exhibiting high levels of deprivation and unemployment compared to the rest of LBW and London, as well as low levels of educational attainment and public health problems which is affecting the quality of life of the existing residents. Consequently, there is an increasing strain on services and public expenditure. Without intervention, the quality of life of the current residents and the associated current issues will continue to deteriorate. The Development therefore looks to enhance the opportunities already existing on the Site and improve the physical environment, raise the aspirations and improve the life chances of those living in the most deprived areas of LBW. Furthermore, the existing open space areas on the Site will be retained and enhanced to make it more of an attractive area for the surrounding communities to use. The Development will maintain the character and uses of the Site and enhance these to improve the quality of life for the existing residents. The Development will create a high quality and vibrant mixed-use development that will build on the history of the area, therefore making the best use of the existing land and positively contribute to the health of the residents within the Development and the surrounding area.

Table 5: Positive health effects anticipated by the Development

Health Theme	Positive health effect
Housing quality and design	<ul style="list-style-type: none"> The Development will comply with Building Regulation requirement M4 (2). The Development does address the housing needs of older people and comply with Building Regulation requirement M4(3). All the residential units are suitable to be adapted to support independent living for older and disabled people. The design of the Development is in line with the 'Secured by Design' principles and been through an extensive consultation process which has included workshops to ensure all requirements are met, including internal space standards. The Development includes the delivery of up to 1,103 residential dwellings which will be provided in a range of

Health Theme	Positive health effect
	<p>tenures and sizes. 256 of these will be affordable homes.</p> <ul style="list-style-type: none"> The Development contains homes that are highly energy efficient. The Development has been designed to comply with Be Lean, Be Clean, Be Green strategy.
Access to healthcare services and other social infrastructure	<ul style="list-style-type: none"> The Development will provide 5,527sqm of new and replaced community facilities floorspace. The proposal has assessed the impact on healthcare facilities and has identified a moderate beneficial effect on healthcare provision. The Development has been found to have a negligible effect on education provision in the local area. The Development will provide a new multi-purpose community facility which will allow a co-location of services in an accessible and strategic location for all to access it.
Access to open space and nature	<ul style="list-style-type: none"> The Development will retain and enhance the existing open space on the Site and provide a total of 87,897sqm of open space; The Development will provide a total of 7,657sqm of play space provision on the Site, which includes 3,087sqm of upgraded play facilities of local play space (5-11 year olds). The play space provision as part of the Development exceeds both the GLA and LBW's benchmark by 4,038sqm. The Development will seek to improve the connections to the existing open spaces surrounding the Site. The Development will provide a range of play spaces for children and young people across the Site. The Development has been designed in line with 'Secured by Design' principles which has ensured that the open spaces are welcoming, safe and accessible for all. A Management plan will be secured via a condition which would set out the strategies to manage and maintain the open space.
Air quality, noise and neighboured amenity	<ul style="list-style-type: none"> The Development has sought to minimise construction effects such as dust, noise, vibration and odours where possible. The Development incorporates measures to reduce air pollution caused by traffic and energy facilities. The Development incorporates measures to minimise noise pollution caused by traffic and commercial uses.
Accessibility and active travel	<ul style="list-style-type: none"> The Development has been designed to encourage walking by providing pedestrian walkways across the Site in addition to strategic links to the wider surroundings. The Development will provide 2,100 cycle spaces to serve the residential element. For the non-residential element of the Development, 139 cycle spaces will be provided. The Development will maintain and enhance the existing connections to the wider networks, as well as future proofing the potential for a new link to Richmond Park. The Development includes highway improvements to improve safety of the local road network. A new bus stop and new bus stands will be provided as part of the Development to serve the future residents and users of the Site. Travel Plans have been prepared for the residential and commercial aspects of the Development to minimise single occupancy car travel. Wheelchair accessible spaces have been provided across the Site and the Development has been designed to ensure the entirety of the Site is accessible to all.
Crime reduction and community safety	<ul style="list-style-type: none"> Security concerns haven addressed by utilising Secured by Design principles, including active frontages and well-lit

Health Theme	Positive health effect
	<p>spaces to discourage crime across the Site.</p> <ul style="list-style-type: none"> • The Development has been designed to split the Site into defined character areas, each with their own identity and characteristics to help the users of the Site to feel secure. • The Development has been subject to extensive public exhibitions, workshops and consultation which has influenced the final design of the Development.
Access to healthy food	<ul style="list-style-type: none"> • The Development includes a range of retail uses. • The Development will avoid an over-concentration of hot food takeaways on the Site.
Access to work and training	<ul style="list-style-type: none"> • The Development will provide 242 full-time equivalent jobs a month and 215 indirect jobs during the construction phase. • Through the increase in proposed floorspace of A1-A5 and B1 uses, employment generation will increase providing between 50 and 59 net additional FTE jobs in comparison to existing employment levels. • The Development will provide floorspace to be used for Eastwood Nursery and a children's centre at Portswood Place. • The Development includes a variety of employment floorspace on the Site which could provide opportunities for work for local people via local procurement arrangements.
Social cohesion and lifetime neighbourhoods	<ul style="list-style-type: none"> • The Development will provide links to connect with the existing communities in the surrounding area. • The Development provides a mix of uses and a range of community facilities for the surrounding areas to use. • The Development provides opportunities for the voluntary and community sectors by the provision of 5,527sqm of community floorspace. • The Development does address the six key components of Lifetime Neighbourhoods.
Minimising the use of resources and	<ul style="list-style-type: none"> • The Development will maintain the character and uses of the Site and enhance these to improve the quality of life for the existing residents and create a high quality and vibrant mixed-use development that will build on the history of the area, therefore making the best use of the existing land. • Dedicated refuse and recycling stores have been set aside as part of the individual designs to accommodate 70 litres per household for mixed recyclables. • A CMP and CLP will be prepared to ensure that the best practice measures are incorporated into the Development.
Climate change.	<ul style="list-style-type: none"> • The design of the Development has complied with the Be Lean, Be Clean, Be Green strategy. • The Development ensures that buildings and public spaces have been designed to respond to winter and summer temperatures. • The Development will provide an uplift of open space already on the Site, totalling 87,692sqm of open space. The Development includes measures across the Site to promote biodiversity across the Site. • The Development will incorporate Sustainable Drainage System techniques that will comprise green roofs, basins, wetlands, bio-retention areas and ponds, permeable surfaces, rainwater harvesting and tanked systems.

7.6 Chapter 6 provides an indicative outline monitoring report which demonstrates how the recommendations identified within the Rapid HIA in Chapter 5 can be monitored throughout

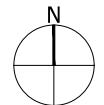
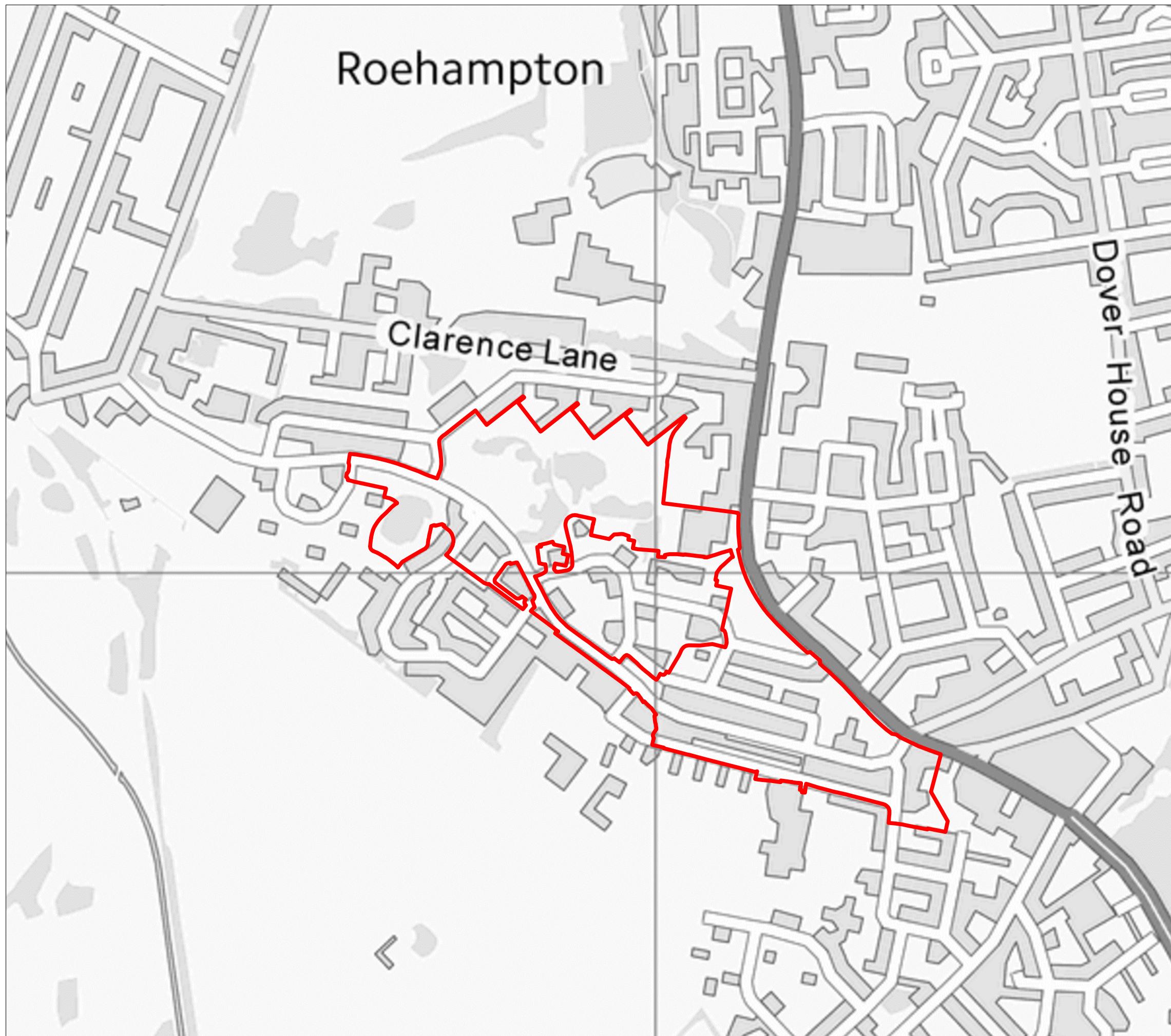
the duration of the Development.

7.7 Table 6 below sets out potential mitigation and enhancements measures that have been identified within the HIA.

Table 6: Recommended mitigation or enhancement action for the Development

Health Theme	Recommended Mitigation or Enhancement Action
Housing quality and design	<ul style="list-style-type: none"> Planning conditions to be attached to the permission to ensure plant such as heating and cooling units operate to acceptable standards, on completion of the Development.
Access to healthcare services and other social infrastructure	<ul style="list-style-type: none"> No mitigation or enhancement measures considered necessary.
Access to open space and nature	<ul style="list-style-type: none"> A Management Plan to be secured by condition to ensure effective management and maintenance of the new open space and public realm during the operational phase of the Development.
Air quality, noise and neigboured amenity	<ul style="list-style-type: none"> Construction Environment Management Plan to be secured by condition to ensure effective control of noise and air quality emissions during the construction stage; Travel Plans to be prepared to show other sustainable ways of travelling to minimise air pollution; and Planning conditions to be attached to the permission to ensure plant such as heating and cooling units operate to acceptable standards, on completion of the Development.
Accessibility and active travel	<ul style="list-style-type: none"> S278 agreements for future highway works during the course of the Development; S106 agreements for financial contributions to the capacity of the local bus network; In relation to encouraging active travel, The Travel Plans or Residents' Welcome Pack could also include a section on safe walking routes to local parks and green spaces to encourage physical and mental wellbeing; Monitoring of the Travel Plans to ensure its effectiveness and where measures are not proving successful, review of the proposals.
Crime reduction and community safety	<ul style="list-style-type: none"> Continued public consultation and engagement during the future Reserved Matters applications when the development process continues forward.
Access to healthy food	<ul style="list-style-type: none"> Consider committing some of the proposed commercial floorspace for social enterprises; and When selecting tenants for commercial floorspace, consider proposed use and potential for adverse effects on health.
Access to work and training	<ul style="list-style-type: none"> Provision of S106 financial obligation towards access to work and training and potential Workmatch opportunities.
Social cohesion and lifetime neighbourhoods	<ul style="list-style-type: none"> No mitigation or enhancement measures considered necessary.
Minimising the use of resources and	<ul style="list-style-type: none"> No mitigation or enhancement measures considered necessary.
Climate change.	<ul style="list-style-type: none"> A Management Plan to be secured via planning condition to ensure the delivery of key mitigation and enhancement measures. Interpretation Boards to increase awareness of biodiversity across the Site.

**APPENDIX 1:
SITE LOCATION PLAN**



Project
Alton Estate

Drawing Title
Site Location Plan

Date 10.05.2019 Scale 1:5,000@A3 Drawn by GS Check by NP
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**APPENDIX 2:
SCOPING LETTER TO LBW**

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Jabed Rahman
Public Health Lead Regeneration
Administrative Department – Public Health
Room 265, Town Hall,
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London
SW18 2PU

Our Ref: 26063/A5/HIA
6th June 2018

Dear Mr Rahman

**ALTON ESTATE, ROEHAMPTON, LONDON BOROUGH OF WANDSWORTH
PROPOSED HEALTH IMPACT ASSESSMENT**

We write to seek agreement with you on our proposed approach and scope for the preparation of a Health Impact Assessment (HIA) we are preparing on behalf of Redrow Homes Ltd, to support the planning application for the proposed redevelopment of part of the Alton Estate, Roehampton.

We have reviewed the requirements set out in the London Plan (March 2015) and the London Borough of Wandsworth (LBW) Local Plan - Core Strategy and Development Management Policies Document (March 2016) (Policy DMS 1) which sets out the requirements for HIA.

For a residential led mixed use development of this nature (circa 1,100 dwellings, circa 9,500 sq.m of non-residential floorspace) we consider a desk based assessment to be appropriate to satisfy the policy requirements. We propose to base the HIA on the London Healthy Urban Development Unit (HUDU) rapid HIA tool (June 2015). We would also draw on the Healthy Urban Planning Checklist (June 2015) which has been created by HUDU, along with the six east London Growth Boroughs, local NHS, NHS London HUDU, Greater London Authority (GLA) and Groundwork London. We do not consider that consultation will be necessary as part of the HIA.

We would be grateful if you could confirm you are content with this approach. If you have any queries or require any further information please do not hesitate to contact me.

Yours sincerely



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APPENDIX 3:
HUDU HEALTHY URBAN PLANNING CHECKLIST

HUDU Planning for Health

Healthy Urban Planning Checklist



Third Edition
May 2017

Purpose of the checklist

The checklist aims to promote healthy urban planning by ensuring that the health and wellbeing implications of local plans and major planning applications are consistently taken into account. By bringing together planning policy requirements and standards that influence health and wellbeing the checklist seeks to mainstream health into the planning system.

The checklist was originally developed in 2012 by representatives from the six London Olympic and Paralympic Host Boroughs, the local NHS, the NHS London Healthy Urban Development Unit, Greater London Authority and Groundwork London. This third edition has been fully updated to be consistent with [The London Plan](#), the Spatial Development Strategy for London consolidated with alterations since 2011, published in March 2016. This will be referred to simply as the London Plan 2016. From this date, the formal alterations to the London Plan form part of the statutory development plans for London Boroughs.

Who is the checklist for?

The [National Planning Policy Framework \(March 2012\)](#) promotes a collaborative approach to health and planning whereby local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population and the barriers to improving health and well-being (paragraph 171). The supporting online [Planning Practice Guidance](#) refers to the use of health impact assessment as a useful tool to assess the impacts of development proposals.

The checklist supports this collaborative approach and encourages different stakeholders to work together to address the health impacts of plans and development proposals. As such, the checklist could be used by:

- Developers, to screen and scope the health impacts of development proposals;
- Planning officers, to help identify and address the health impacts of plans and development proposals;
- Public health and environmental health professionals, to comment and scrutinise plans and development proposals;
- Neighbourhood forums, community groups and housing associations to comment on major planning applications to help foster community engagement

To create and develop healthy and sustainable places and communities, the Marmot Review of Health Inequalities in England '[Fair Society Healthy Lives](#)' recommends that the planning system should be fully integrated with transport, housing, environmental and health policy.

Therefore, the checklist will also be of interest to environmental health officers concerned with environmental impacts and risks, transport planners concerned with promoting active travel and housing officers seeking to ensure that new housing is affordable and accessible.

What is healthy urban planning?

Healthy urban planning aims to promote healthy, successful places for people to live and work in. This can be achieved by providing the homes, jobs and services that people need, reducing environmental risks and delivering well designed buildings and urban spaces which will create the conditions for healthy, active lifestyles. In addition to access to healthcare services, a number of other factors are known to influence a person's health status and lifestyle, including economic, environmental and social conditions. These factors are referred to as the wider or social determinants of health.

Healthy urban planning seeks to highlight and promote the role of planning to influence these social determinants of health. In many ways, planners already 'do' health, by promoting sustainable development and travel, enhancing green spaces, reducing pollution and protecting residential amenity. However, healthy urban planning goes further by explicitly recognising the role of planning and by using health issues as a way to promote good planning and design and raise standards. Poorly planned and designed buildings and spaces could deter healthy lifestyles and exacerbate poor physical and mental health. The principles of healthy urban planning apply to both new development and urban regeneration programmes such as housing estate renewal schemes.

Local authorities are responsible for a number of regulatory functions, which are separate from planning controls, such as building regulations, traffic regulations, environmental protection and a range of licensing regimes. The checklist refers only to planning controls, although other regulatory controls, particularly environmental protection, food premises licensing and traffic regulations are closely related and required in order to achieve a 'healthy' development.

Urban design and healthy urban planning

Healthy urban planning means good planning and high quality urban design. Good design and good planning can help reduce health care costs over time by preventing ill-health from risks attributed to urban planning, including air pollution, road injuries, worklessness and poor housing. Good design also generates financial, social and environmental value. A well designed 'healthy' development will add economic value by increasing sales and lettings of residential units and producing higher returns on investment.

'Active Design' is a key element of healthy urban planning. Design has a crucial role to support activity in buildings and places in response to rising levels of obesity and related chronic diseases. New York City has produced [Active Design Guidelines](#), which provides guidance on creating healthier buildings, streets, and urban spaces. The Guidelines demonstrate that active design will help to reduce energy consumption, increase sustainability, and be cost effective. It is recognised that active design can also address mental health and wellbeing.

Bringing together policy requirements, standards and assessments

The checklist aims to bring together key policy requirements and standards, which influence health and wellbeing to assist the decision-making process. A 'healthy' development can be achieved when these requirements and standards are met and exceeded.

The [London Plan 2016](#) provides a strong policy framework for integrating health and spatial planning. It seeks to improve health and address health inequalities by requiring new developments to be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce health inequalities ([Policy 3.2](#)).

The checklist refers to London Plan policies and standards set out in Mayoral supplementary planning guidance, notably the quality and design standards in the [Housing Supplementary Planning Guidance \(2016\)](#). This guidance updates London housing standards to reflect the implementation of the Government's new national technical standards. In addition to these standards the checklist also includes good practice standards which seek to 'raise the bar' and demonstrate that a development has fully considered health and wellbeing issues.

There are a range of national standards and assessments which when used together constitute healthy urban planning, such as the [Housing - Optional Technical Standards](#), [Lifetime Homes](#) and [Lifetime Neighbourhoods](#), [Building for Life](#) and [Secured by Design](#). These assessments are illustrated in Figure 1.

Figure 1 – Assessments and standards



Much of the information needed to complete the checklist will be contained in documents submitted with a planning application required to validate the application (see Table 1 below). The checklist seeks to bring together existing information and assessments to demonstrate that health, as a material planning consideration, has been addressed.

Table 1 - Planning application information requirements

	Air Quality assessment	Biodiversity and ecology report	Housing Optional Technical Standard's	Design and Access Statement	Flood risk assessment	Landscaping Strategy	Noise impact assessment	Open space assessment	Planning Statement	Regeneration statement	Retail impact assessment	Sustainability statement	Transport Assessment and Travel Plan
Healthy homes			✓	✓					✓	✓		✓	
Active Travel				✓					✓				✓
Healthy environment	✓	✓	✓		✓	✓	✓	✓	✓			✓	
Vibrant neighbourhoods				✓		✓			✓	✓	✓		

The Growth and Infrastructure Act 2013 introduced measures to speed up the planning application process. The amount of information submitted with a planning application has been reduced to a 'reasonable' level and design and access statements are now only required for major applications.

When to use the checklist?

The [Mayor of London's Social Infrastructure Supplementary Planning Guidance \(May 2015\)](#) describes three types of health impact assessment (HIA): a 'full' HIA involves comprehensive analysis of all potential health and wellbeing impacts; a 'rapid' HIA is a less resource intensive process, involving a more focused investigation of health impacts; and a 'desktop' assessment which draws on existing knowledge and evidence, often using published checklists. It suggests that the Healthy Urban Planning Checklist could be used as a 'desktop' assessment tool.

The checklist can be used to ensure that health and wellbeing issues are embedded into local plans, masterplans and major planning applications.

The checklist should be customised for local use to reflect local circumstances and priorities and could be used:

- as part of a Local Plan review to ensure that health and wellbeing issues are identified and addressed
- to screen possible health impacts as part of Health Impact Assessment, Integrated Impact Assessment or Environmental Impact Assessment processes
- to accompany a planning application, subject to local policy guidance and validation requirements
- by internal and external consultees to comment on and scrutinise major development proposals
- to help develop a neighbourhood plan and neighbourhood ‘health’ projects.

It is important that the use of the tool is monitored and evaluated. The checklist could be periodically reviewed by local health and wellbeing boards and recommendations could outline where further evidence is needed, using the Joint Strategic Needs Assessment or action supported by wider public health initiatives. The [Public Health Outcomes Framework](#) could be used to measure impacts and assess the effectiveness of the checklist. At a local level, the checklist should be updated by local authority planning departments to ensure that the national, regional and local policy and guidance references are up to date.

Neighbourhood planning

Neighbourhood planning was introduced as part of the Localism Act 2011. In London, neighbourhood forums can draw up a neighbourhood development plan. A proportion of Community Infrastructure Levy (CIL) funding can be spent on local community priorities. Therefore, local communities have a greater opportunity to shape local policy and infrastructure priorities and influence development proposals. This checklist could be used to help develop a neighbourhood plan, including identifying possible neighbourhood CIL ‘health’ projects and as a resource to help community groups comment on a planning application.

The planning application process

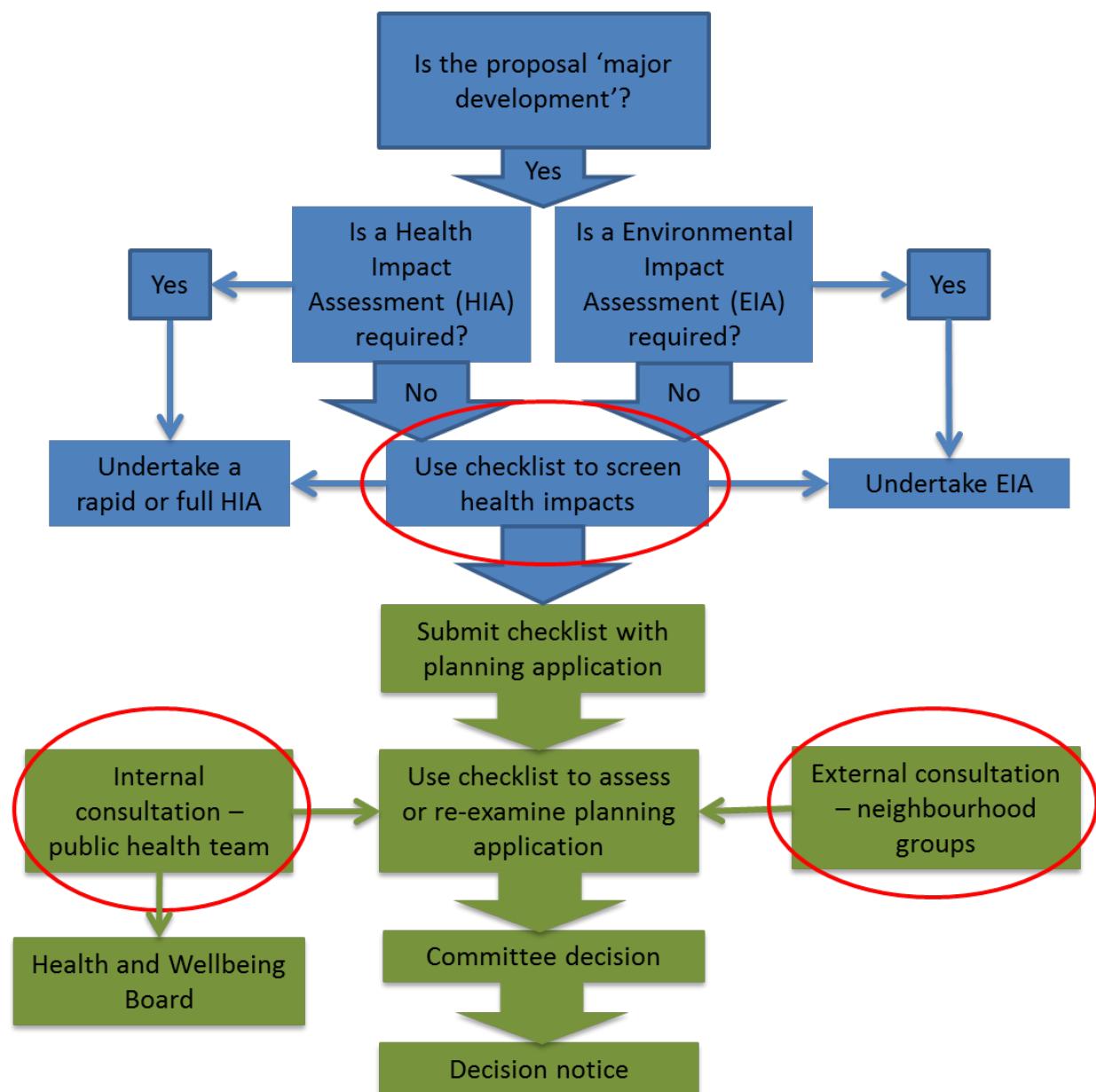
It is intended that the checklist should be applied to major development proposals comprising 10 or more residential units (or a site area of 0.5 hectares or more), or 1,000 square metres or more of non-residential floorspace (or a site area of 1.0 hectares or more). The checklist is most effective when used throughout the lifecycle of a development proposal from pre-application discussions to the determination of a planning application. At the pre-application stage, there is more scope to influence the design, layout and composition of a development proposal.

For large scale development proposals a Health Impact Assessment (HIA) may be required, with a full assessment providing information on health needs and priorities, including

community engagement, and setting out a detailed assessment of health impacts and proposed mitigation and enhancement measures. For large scale development proposals such as strategic planning applications referred to the Mayor of London, it is recommended that other assessment tools, such as the [HUDU Rapid HIA Tool](#) is used.

Figure 2 below illustrates how the checklist could be used as part of the planning application process. Three key areas where the checklist could be used are highlighted.

Figure 2 - the planning application process



How to use the checklist

The checklist is divided into four themes. Each theme contains a number of questions focused on a planning issue. Under each theme there are a number of related health and wellbeing issues many of which are identified in local joint strategic needs assessments and health and wellbeing strategies, such as those related to:

- Obesity and diseases related to physical inactivity and poor diet
- Excess winter deaths
- Air and noise pollution
- Road safety
- Social isolation

Theme	Planning issue	Health and wellbeing issue
1. Healthy housing	<ul style="list-style-type: none">• Housing design• Accessible housing• Healthy living• Housing mix and affordability	<ul style="list-style-type: none">• Lack of living space - overcrowding• Unhealthy living environment – daylight, ventilation, noise• Excess deaths due to cold / overheating• Injuries in the home• Mental illness from social isolation and fear of crime
2. Active travel	<ul style="list-style-type: none">• Promoting walking and cycling• Safety• Connectivity• Minimising car use	<ul style="list-style-type: none">• Physical inactivity, cardiovascular disease and obesity• Road and traffic injuries• Mental illness from social isolation• Noise and air pollution from traffic
3. Healthy environment	<ul style="list-style-type: none">• Construction• Air quality• Noise• Contaminated land• Open space• Play space• Biodiversity• Local food growing• Flood risk• Overheating	<ul style="list-style-type: none">• Disturbance and stress caused by construction activity• Poor air quality - lung and heart disease• Disturbance from noisy activities and uses• Health risks from toxicity of contaminated land• Physical inactivity, cardiovascular disease and obesity• Mental health benefits from access to nature and green space and water• Opportunities for food growing – active lifestyles, healthy diet and tackling food poverty• Excess summer deaths due to overheating
4. Vibrant neighbourhoods	<ul style="list-style-type: none">• Healthcare services• Education• Access to social infrastructure• Local employment and healthy	<ul style="list-style-type: none">• Access to services and health inequalities• Mental illness and poor self-esteem associated with unemployment and poverty• Limited access to healthy food linked to obesity and related diseases• Poor environment leading to physical

Theme	Planning issue	Health and wellbeing issue
	workplaces <ul style="list-style-type: none"> Access to local food shops Public buildings and spaces 	inactivity <ul style="list-style-type: none"> Ill health exacerbated through isolation, lack of social contact and fear of crime

It may be the case that not all the issues and questions will be relevant to a specific plan or development proposal and the user should select and prioritise the issues accordingly. Some issues may be directly related to an individual development, others may be relevant at a neighbourhood level where the cumulative impact of development can contribute to a healthy neighbourhood.

Each section summarises the impact on health. Under each theme, key questions are asked linked to policy requirements and standards. The checklist identifies why each issue is important to health and wellbeing. An appendix providing general policy references and sources of evidence is provided. This should be supplemented with local information.

The checklist aims to ensure a development proposal is as 'healthy' as possible, by achieving as many 'Yes' ticks and avoiding 'No's. A 'No' gives a warning that an aspect of a development may need to be reconsidered. Local circumstances may justify why a scheme cannot meet the expected standard.

Where the response to a question is unclear or not known, more information may be required. The checklist can stimulate discussions and negotiations on planning applications, supported by internal and external consultation and supporting information, for example from public health officers.

Note on Code for Sustainable Homes and Lifetime Homes Standards

Following the technical housing standards review, the Government has withdrawn the Code for Sustainable Homes, aside from the management of legacy cases.

Legacy cases are those where residential developments are legally contracted to apply a code policy (e.g. affordable housing funded through the national Affordable Housing Programme 2015 to 2018, or earlier programme), or where planning permission has been granted subject to a condition stipulating discharge of a code level, and developers are not appealing the condition or seeking to have it removed or varied. In these instances, it is possible to continue to conduct code assessments.

Details of the new approach to the setting of technical housing standards in England were announced on 27 March 2015 and a new set of streamlined national technical standards were published. The Code for Sustainable Homes is now no longer Government policy and has been archived.

The Government has also withdrawn the Lifetime Homes concept. However, many local planning policies will continue to require Lifetime Homes standards in new developments. However, as of October 2015, the London Plan will no longer be linked to Lifetime Homes standards. In particular, the requirement in London Plan Policy 3.8 B(c) that 'all new housing is built to The Lifetime Homes standard' is replaced by 'ninety percent of new housing meets Building Regulation requirement M4 (2) "accessible and adaptable dwellings"'. The Healthy Urban Planning Checklist has been updated to include the modified London Plan requirements.

Theme 1: Healthy Housing				
Issue	Key questions	Yes /No / Not relevant Comment	Policy requirements and standards	Why is it important
a. Healthy design	Does the proposal meet all the standards for daylight, sound insulation, private space and accessible and adaptable dwellings?		<p>London Plan Policy 5.2 Minimising carbon dioxide emissions and Housing SPG Standard 35: zero carbon residential buildings from 2016 and non-domestic buildings from 2019.</p> <p>Housing SPG Standard 29 on dual aspect and Standard 32 on daylight and sunlight.</p> <p>Housing SPG Standard 4 on communal open space, supported by London Plan Policy 2.18, Standards 1 and 2 on defining good places, and Standard 3 on public open space.</p> <p>Housing SPG Standards 26 and 27 on minimum provision of private (amenity) open space.</p> <p>London Plan Policy 3.8 Housing choice and Housing SPG Standard 11 on access require 90% of new homes meet Building Regulation M4(2) 'accessible and adaptable dwellings'.</p> <p>Sound insulation and noise - London Plan Policy 7.15 and Housing SPG Standard 30 on noise.</p> <p>Housing SPG Standards 8 and 9 on entrance and approach.</p>	<p>Satisfying these standards can help meet carbon dioxide emissions targets.</p> <p>Good daylight can improve the quality of life and reduce the need for energy to light the home.</p> <p>The provision of an inclusive outdoor space, which is at least partially private, can improve the quality of life.</p> <p>Improved sound insulation can reduce noise disturbance and complaints from neighbours.</p>

Theme 1: Healthy Housing

Issue	Key questions	Yes /No / Not relevant Comment	Policy requirements and standards	Why is it important
b. Accessible housing	<p>Does the proposal provide accessible homes for older or disabled people?</p> <p>Does the proposal ensure that every non-ground floor dwelling is accessible by a lift that can accommodate an ambulance trolley?</p>		<p>London Plan Policy 3.8 and Housing SPG Standard 11 on access require 10 per cent all new housing to be designed to be wheelchair accessible or easily adaptable such that they meet Building Regulation M4(3) 'wheelchair user dwellings'.</p> <p>Housing SPG Standards 15 and 16 relate to the provision of lifts. Good practice standard - the provision of an ISO standard 13 person lift in a configuration which can accommodate a trolley bed (see Department of Health Technical Memorandum 08-02: Lifts).</p>	<p>Accessible and easily adaptable homes can meet the changing needs of current and future occupants.</p> <p>One of the main methods of transportation of immobile patients is by trolley bed. Non-ground floor dwellings should be accessible by a lift that can accommodate an ambulance trolley.</p>
c. Healthy living	<p>Does the proposal provide dwellings with adequate internal space, including sufficient storage space and separate kitchen and living spaces?</p> <p>Does the proposal encourage the use of stairs by ensuring that they are well located, attractive and welcoming?</p>		<p>London Plan Policy 3.5 (Table 3.3 - minimum space standards for new dwellings) and Housing SPG Standard 24 on dwelling space standards.</p> <p>Housing SPG Standard 25 - dwellings should accommodate the furniture, access and activity space requirements relating to the declared level of occupancy.</p> <p>Also, Housing SPG Standard 28 on privacy and Standard 31 on ceiling heights.</p> <p>Housing SPG Standards 12 to 16 relate to shared internal circulation, cores and lifts.</p>	<p>Sufficient space is needed to allow for the preparation and consumption of food away from the living room to avoid the 'TV dinner' effect.</p> <p>Rather than having lifts at the front and staircases at the back of buildings, it is preferable to have them located at the front to encourage people that can to use them.</p>

Theme 1: Healthy Housing				
Issue	Key questions	Yes /No / Not relevant Comment	Policy requirements and standards	Why is it important
d. Housing mix and affordability	Does the proposal provide affordable family sized homes?		<p><u>London Plan Policy 3.8</u> Housing choice.</p> <p><u>London Plan Policy 3.11</u> Affordable housing targets seeks to maximise affordable housing provision and to ensure an average of at least 17,000 more affordable homes per year in London over the term of the London Plan. 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale.</p> <p>The Mayor's <u>Homes for Londoners: Affordable Homes Programme 2016-21</u> is a £3bn fund to help start building at least 90,000 affordable homes by 2021.</p>	<p>The provision of affordable housing can create mixed and socially inclusive communities. The provision of affordable family sized homes can have a positive impact on the physical and mental health of those living in overcrowded, unsuitable or temporary accommodation.</p> <p>Both affordable and private housing should be designed to a high standard ('tenure blind').</p>

Theme 2: Active Travel				
Issue	Key questions	Yes / No / Not relevant Comment	Policy requirements and standards	Why is it important
a. Promoting walking and cycling	Does the proposal promote cycling and walking through measures in a travel plan, including adequate cycle parking and cycle storage?		London Plan Policy 6.3 (C) Travel plans London Plan Policy 6.9 Cycling. London Plan Policy 6.10 Walking. London Plan - Parking Addendum to Chapter 6 on cycle parking : Table 6.3 Cycle parking minimum standards. Housing SPG Standards 20 and 21 on cycle storage.	A travel plan can address the environmental and health impacts of development by promoting sustainable transport, including walking and cycling. Cycle parking and storage in residential dwellings can encourage cycle participation.
b. Safety	Does the proposal include traffic management and calming measures and safe and well lit pedestrian and cycle crossings and routes?		London Plan Policy 6.9 Cycling. London Plan Policy 6.10 Walking.	Traffic management and calming measures and safe crossings can reduce road accidents involving cyclists and pedestrians and increase levels of walking and cycling.
c. Connectivity	Does the proposal connect public realm and internal routes to local and strategic cycle and walking networks and public transport?		London Plan Policy 6.9 Cycling - Map 6.2 Cycle superhighways . London Plan Policy 6.10 Walking - Map 6.3 Walk London Network . Green Infrastructure: The All London Green Grid SPG (March 2012). Transport for London Legible London . Transport for London Bus Service Planning Guidelines .	Developments should prioritise the access needs of cyclists and pedestrians. Routes should be safe, direct and convenient and barriers and gated communities should be avoided. Developments should be accessible by public transport.

Theme 2: Active Travel

Issue	Key questions	Yes / No / Not relevant Comment	Policy requirements and standards	Why is it important
d. Minimising car use	Does the proposal seek to minimise car use by reducing car parking provision, supported by the controlled parking zones, car free development and car clubs?		<p>London Plan Policy 6.13 Parking - Table 6.2 Car parking standards (Parking addendum to chapter 6).</p> <p>Housing SPG Standards 17 to 19 on car parking provision.</p>	<p>Space for pedestrians and cyclists should be given priority over commercial and private vehicles. Maximum car parking levels allows for provision to be reduced as far as practicable.</p> <p>Car clubs can be effective in reducing car use and parking demand at new residential developments.</p>

Theme 3: Healthy Environment

Issue	Key questions	Yes / No / Not relevant Comment	Policy requirements and standards	Why is it important
a. Construction	Does the proposal minimise construction impacts such as dust, noise, vibration and odours?		<p>London Plan Policy 5.3 Sustainable design and construction.</p> <p>London Plan Policy 5.18 Construction, excavation and demolition waste.</p> <p>The Control of Dust and Emissions During Construction and Demolition SPG (July 2014).</p> <p>Housing SPG Standard 34 on environmental performance.</p>	<p>Construction sites can have a negative impact on an area and can be perceived to be unsafe. Construction activity can cause disturbance and stress, which can have an adverse effect on physical and mental health.</p> <p>Mechanisms should be put in place to control hours of construction, vehicle movements and pollution.</p> <p>Community engagement before and during construction can help alleviate fears and concerns.</p>
b. Air quality	Does the proposal minimise air pollution caused by traffic and energy facilities?		<p>London Plan Policy 7.14 Improving air quality.</p> <p>At least 'air quality neutral' - Housing SPG Standard 33 on air quality.</p> <p>London Plan Policy 5.10 Urban greening.</p> <p>London Plan Policy 5.3 Sustainable design and construction.</p>	<p>The long-term impact of poor air quality has been linked to life-shortening lung and heart conditions, cancer and diabetes.</p>

Theme 3: Healthy Environment

Issue	Key questions	Yes / No / Not relevant Comment	Policy requirements and standards	Why is it important
c. Noise	Does the proposal minimise the impact of noise caused by traffic and commercial uses through insulation, site layout and landscaping?		<p>London Plan Policy 7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.</p> <p>Limit the transmission of noise to sound sensitive rooms - Housing SPG Standard 30 on noise.</p>	Reducing noise pollution helps improve the quality of urban life.
d. Open space	<p>Does the proposal retain or replace existing open space and in areas of deficiency, provide new open or natural space, or improve access to existing spaces?</p> <p>Does the proposal set out how new open space will be managed and maintained?</p>		<p>London Plan Policy 7.1 Lifetime neighbourhoods.</p> <p>London Plan Policy 7.18 Protecting open space and addressing deficiency, Table 7.2 Public open space categorisation.</p> <p>London Plan Policy 7.19 Biodiversity and access to nature.</p> <p>Housing SPG Standards 3 and 4 on communal and public open space.</p>	<p>Access to open space has a positive impact on health and wellbeing. Living close to areas of green space, parks, woodland and other open space can improve physical and mental health regardless of social background.</p> <p>To maintain the quality and usability of open spaces an effective management and maintenance regime should be put in place.</p>

Theme 3: Healthy Environment

Issue	Key questions	Yes / No / Not relevant Comment	Policy requirements and standards	Why is it important
e. Play space	Does the proposal provide a range of play spaces for children and young people?		<p>London Plan Policy 3.6 Children and young people's play and informal recreation facilities.</p> <p>Shaping Neighbourhoods: Play and Informal Recreation SPG (Sept 2012) - quantity Benchmark Standard of a minimum of 10 square metres per child regardless of age (4.24) and accessibility to play space Benchmark Standard (Table 4.4).</p> <p>Housing SPG Standard 5 on play space.</p>	<p>Regular participation in physical activity among children and young people is vital for healthy growth and development.</p> <p>The location of play spaces should be accessible by walking and cycling routes that are suitable for children to use.</p>
f. Biodiversity	Does the proposal contribute to nature conservation and biodiversity?		<p>London Plan Policy 7.19 Biodiversity and access to nature. Table 7.3 - London regional Biodiversity Action Plan habitat targets for 2020.</p> <p>Housing SPG Standard 40 on ecology.</p>	<p>Access to nature and biodiversity contributes to mental health and wellbeing.</p> <p>New development can improve existing, or create new, habitats or use design solutions (green roofs, living walls) to enhance biodiversity.</p>
g. Local food growing	Does the proposal provide opportunities for food growing, for example by providing allotments, private and community gardens and green roofs?		<p>London Plan Policy 5.10 Urban greening.</p> <p>London Plan Policy 7.22 Land for food.</p> <p>London Plan Policy 5.11 Green roofs and development site environs.</p>	Providing space for local food growing helps promote more active lifestyles, better diets and social benefits.

Theme 3: Healthy Environment

Issue	Key questions	Yes / No / Not relevant Comment	Policy requirements and standards	Why is it important
h. Flood risk	Does the proposal reduce surface water flood risk through sustainable urban drainage techniques, including storing rainwater, use of permeable surfaces and green roofs?		<p>London Plan Policy 5.3 Sustainable design and construction.</p> <p>London Plan Policy 5.11 Green roofs and development site environs.</p> <p>London Plan Policy 5.13 Sustainable drainage.</p> <p>Flooding and drainage - Housing SPG Standards 38 and 39.</p>	<p>Flooding can result in risks to physical and mental health. The stress of being flooded and cleaning up can have a significant impact on mental health and wellbeing.</p> <p>It is likely that increasing development densities and building coverage coupled with more frequent extreme weather events will increase urban flood risk.</p>
i. Overheating	Does the design of buildings and spaces avoid internal and external overheating, through use of passive cooling techniques and urban greening?		<p>London Plan Policy 5.3 Sustainable design and construction.</p> <p>London Plan Policy 5.9 Overheating and cooling.</p> <p>London Plan Policy 5.10 Urban greening.</p> <p>London Plan Policy 5.11 Green roofs and development site environs.</p> <p>Overheating - Housing SPG Standards 36.</p>	<p>Climate change with higher average summer temperatures is likely to intensify the urban heat island effect and result in discomfort and excess summer deaths amongst vulnerable people.</p> <p>Urban greening - tree planting, green roofs and walls and soft landscaping can help prevent summer overheating.</p>

Theme 4: Vibrant Neighbourhoods

Issue	Key questions	Yes / No / Not relevant Comment	Policy requirements and standards	Why is it important
a. Health services	Has the impact on healthcare services been addressed?		<p>London Plan Policy 3.17 Health and social care facilities.</p> <p>NHS London Healthy Urban Development Unit Planning Contributions Tool (the HUDU Model).</p> <p>Social Infrastructure SPG (2015).</p>	Poor access and quality of healthcare services exacerbates ill health, making effective treatment more difficult. The provision of support services and advice on healthy living can prevent ill health.
b. Education	Has the impact on primary, secondary and post-19 education been addressed?		<p>London Plan Policy 3.18 Education facilities.</p>	Access to a range of primary, secondary and post-19 education improves self-esteem, job opportunities and earning capacity.
c. Access to social infrastructure	<p>Does the proposal contribute to new social infrastructure provision that is accessible, affordable and timely?</p> <p>Have opportunities for multi-use and the co-location of services been explored?</p>		<p>London Plan Policy 3.16 Protection and enhancement of social infrastructure.</p> <p>London Plan Policy 7.1 Lifetime neighbourhoods.</p> <p>Social Infrastructure SPG (2015).</p>	<p>Good access to local services is a key element of a lifetime neighbourhood and additional services will be required to support new development. Not doing so will place pressure on existing services.</p> <p>Future social infrastructure requirements are set out in Borough infrastructure plans and developments will be expected to contribute towards additional services and facilities.</p>

Theme 4: Vibrant Neighbourhoods

Issue	Key questions	Yes / No / Not relevant Comment	Policy requirements and standards	Why is it important
d. Local employment and healthy workplaces	<p>Does the proposal include commercial uses and provide opportunities for local employment and training, including temporary construction and permanent 'end-use' jobs?</p> <p>Does the proposal promote the health and wellbeing of future employees by achieving BREEAM health and wellbeing credits?</p>		<p>London Plan Policy 4.12 Improving opportunities for all and London Plan Policy 8.2 Planning obligations.</p> <p>London Plan Policy 7.1 Lifetime neighbourhoods.</p> <p>Workplace environment - BREEAM health and wellbeing credits.</p>	<p>Unemployment generally leads to poverty, illness and a reduction in personal and social esteem. Employment can aid recovery from physical and mental illnesses.</p> <p>Creating healthier workplaces can reduce ill health and employee sickness absence.</p>
e. Access to local food shops	<p>Does the proposal provide opportunities for local food shops?</p> <p>Does the proposal avoid an over concentration or clustering of hot food takeaways in the local area?</p>		<p>London Plan Policy 4.7 Retail and town centre development.</p> <p>London Plan Policy 4.8 Supporting a successful and diverse retail sector.</p> <p>London Plan Policy 4.9 Small shops.</p> <p>London Plan Policy 7.1 Lifetime neighbourhoods.</p>	<p>A proliferation of hot food takeaways and other outlets selling fast food can harm the vitality and viability of local centres and undermine attempts to promote the consumption of healthy food, particularly in areas close to schools.</p>

Theme 4: Vibrant Neighbourhoods

Issue	Key questions	Yes / No / Not relevant Comment	Policy requirements and standards	Why is it important
f. Public realm	<p>Does the design of the public realm maximise opportunities for social interaction and connect the proposal with neighbouring communities?</p> <p>Does the proposal allow people with mobility problems or a disability to access buildings and places?</p>		<p>London Plan Policy 7.1 Lifetime neighbourhoods.</p> <p>London Plan Policy 7.2 An inclusive environment.</p> <p>London Plan Policy 7.5 Public realm.</p> <p>Shaping Neighbourhoods. Accessible London: Achieving and Inclusive Environment SPG (Oct 2014).</p> <p>Housing SPG Standard 10 on active frontages.</p>	<p>The public realm has an important role to play in promoting walking and cycling, activity and social interaction. It also affects people's sense of place, security and belonging. It is a key component of a lifetime neighbourhood.</p> <p>Shelter, landscaping, street lighting and seating can make spaces attractive and inviting.</p> <p>Implementing inclusive design principles effectively creates an accessible environment, in particular for disabled and older people.</p>

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Glossary

Amenity (or residential amenity) – is physical external space which is part of the private home and enjoyed by occupiers of the dwelling. The level of enjoyment is also dependent on a number of factors, including daylight/sunlight, air quality, noise and light pollution and visual quality.

Biodiversity – refers to a diverse variety of life (species) in a habitat or ecosystem.

BREEAM - Building Research Establishment Environmental Assessment Methodology is a method of assessing, rating and certifying the sustainability of buildings developed by the Building Research Establishment.

Building Regulations – are standards that apply to most building work with approval required from Building Control Bodies - either the Local Authority or the private sector as an Approved Inspector.

Community Infrastructure Levy (CIL) – is a charge levied on development under the Planning Act 2008 by charging authorities (in London, the boroughs and the Mayor of London) to contribute towards a range of infrastructure, including physical, green and social infrastructure.

Car club - is a service that allows its members to hire a car for short-term use enabling members to have the option of using a car from time to time without having to own one.

Environmental protection - Unitary and district local authorities are responsible for inspections and enforcement duties under the Environmental Protection Act 1990 regarding pollution prevention and control, noise disturbance and contaminated land.

Gated developments - developments that are totally secured from non-residents through the use of controlled access gates.

Green roof or wall - a roof or wall that is intentionally covered with vegetation which can help reduce the causes and effects of climate change locally whilst promoting enhanced biodiversity.

Licensing - Unitary or district local authorities are responsible for a range of licensing regimes, including alcohol, entertainment and food premises under the Licensing Act 2003, gambling premises under the Gambling Act 2005 and houses in multiple occupation under the Housing Act 2004.

Lifetime Neighbourhoods – Lifetime neighbourhoods are places where people are able to live and work in safe, healthy, supportive and inclusive environments with which they are proud to identify. There are numerous design standards and checklists that cover elements of the lifetime neighbourhoods process, including WHO Age Friendly Cities checklist, BREEAM for Communities, and Building for Life.

Pedestrian - refers to a person walking on foot, but also includes those using wheelchairs and mobility scooters.

Planning Obligations (also known as 'Developer Contributions' or 'Section 106 Agreements') are private agreements made between local authorities and developers under section 106 of the Town and Country Planning Act 1990 (as amended). They can be attached to a planning permission to make development acceptable which would otherwise be unacceptable in planning terms. The land itself, rather than the person or organisation that develops the land, is bound by the agreement. Since the introduction of the Community Infrastructure Levy, agreements are focused on site-specific mitigation.

Public realm - the space between and within buildings that is publicly accessible, including streets, squares, forecourts, parks and open spaces.

Social exclusion/isolation - is a term to describe the effect whereby individuals or entire communities of people are excluded or disadvantaged from access to housing, employment, healthcare and civic engagement.

Sustainable Urban Drainage System (SUDS) - used to describe the various approaches that can be used to manage surface water drainage in a way that mimics the natural environment.

Tenure blind residential development - used to promote integration of different tenures in a single development by designing houses for sale and houses built for affordable or social rent so that they are similar in design and appearance so as to mask the tenures. The conviction is that tenure blind design helps social integration without affecting property prices.

Traffic calming - self-enforcing measures designed to encourage driving at speeds appropriate to local conditions, improve the environment and reduce accidents.

Traffic regulations and highway powers - Unitary and county authorities are responsible for traffic regulations regarding parking, speed limits and crossings under the Road Traffic Regulation Act 1984 and powers under the Highways Act 1980 to maintain and ensure safe public use of local highways. Developer contributions towards highway improvements can be secured under section 278 of the Highways Act.

Travel plan - a plan to manage travel to and from a development site or occupied building, to reduce transport impacts and deliver sustainable transport on an on-going basis.

NHS London Healthy Urban Development Unit

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APPENDIX 4:
**PUBLIC HEALTH ENGLAND: LONDON BOROUGH OF
WANDSWORTH HEALTH PROFILE 2018**



Wandsworth

Unitary authority

This profile was published on 3 July 2018

Local Authority Health Profile 2018

This profile gives a picture of people's health in Wandsworth. It is designed to help local government and health services understand their community's needs, so that they can work together to improve people's health and reduce health inequalities.

Health in summary

The health of people in Wandsworth is generally better than the England average. About 17% (8,300) of children live in low income families. Life expectancy for women is higher than the England average.

Health inequalities

Life expectancy is 8.8 years lower for men and 4.9 years lower for women in the most deprived areas of Wandsworth than in the least deprived areas.**

Child health

In Year 6, 20.5% (427) of children are classified as obese. The rate of alcohol-specific hospital stays among those under 18 is 20*, better than the average for England. This represents 12 stays per year. Levels of GCSE attainment, breastfeeding initiation and smoking at time of delivery are better than the England average.

Adult health

The rate of alcohol-related harm hospital stays is 521*, better than the average for England. This represents 1,247 stays per year. The rate of self-harm hospital stays is 81*, better than the average for England. This represents 240 stays per year. Estimated levels of adult excess weight and physical activity are better than the England average. Rates of sexually transmitted infections and TB are worse than average. Rates of hip fractures and people killed and seriously injured on roads are better than average. The rate of early deaths from cardiovascular diseases is worse than average. Rates of statutory homelessness, violent crime, early deaths from cancer and the percentage of people in employment are better than average.



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Contains OS data © Crown copyright and database right 2018

Map data © 2018 Google

Local authority displayed with ultra-generalised clipped boundary

For more information on priorities in this area, see:

- www.wandsworth.gov.uk/jsna

Visit www.healthprofiles.info for more area profiles, more information and interactive maps and tools.

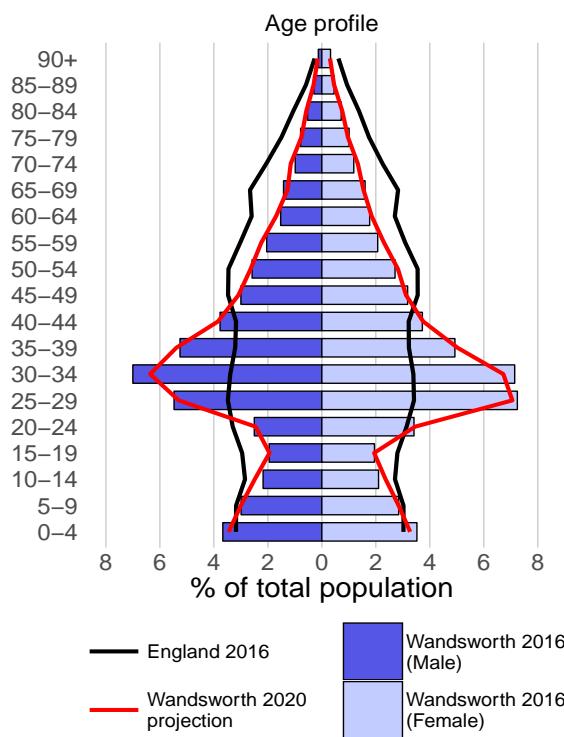
Local Authority Health Profiles are Official Statistics and are produced based on the three pillars of the [Code of Practice for Statistics](#): Trustworthiness, Quality and Value.

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* rate per 100,000 population

** see page 3

Population



Understanding the sociodemographic profile of an area is important when planning services. Different population groups may have different health and social care needs and are likely to interact with services in different ways.

	Wandsworth (persons)	England (persons)
Population (2016)*	321	55,268
Projected population (2020)*	330	56,705
% population aged under 18	19.3%	21.3%
% population aged 65+	9.3%	17.9%
% people from an ethnic minority group	24.8%	13.6%

* thousands

Source:
Populations: Office for National Statistics licensed under the Open Government Licence
Ethnic minority groups: Annual Population Survey, October 2015 to September 2016

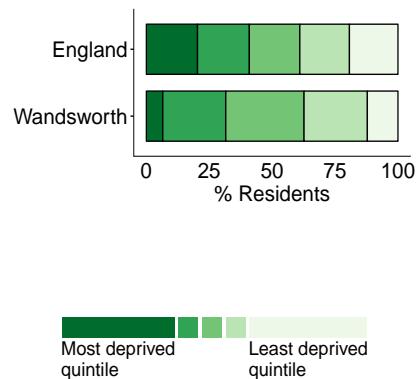
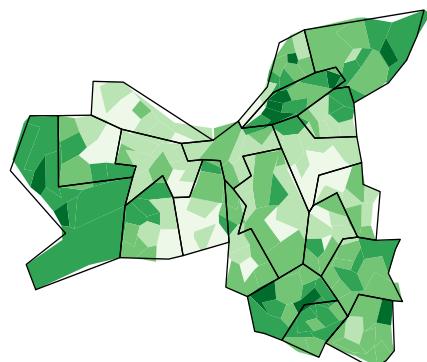
Deprivation

The level of deprivation in an area can be used to identify those communities who may be in the greatest need of services. These maps and charts show the Index of Multiple Deprivation 2015 (IMD 2015).

National

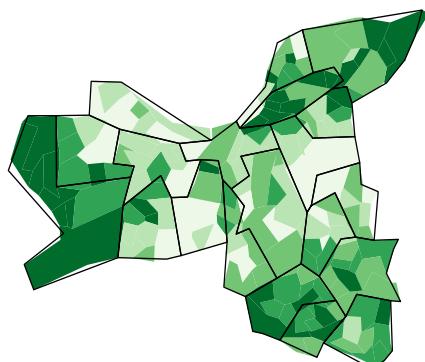
The first of the two maps shows differences in deprivation in this area based on national comparisons, using national quintiles (fifths) of IMD 2015, shown by lower super output area. The darkest coloured areas are some of the most deprived neighbourhoods in England.

The chart shows the percentage of the population who live in areas at each level of deprivation.



Local

The second map shows the differences in deprivation based on local quintiles (fifths) of IMD 2015 for this area.



Lines represent electoral wards (2017). Quintiles shown for 2011 based lower super output areas (LSOAs). Contains OS data © Crown copyright and database rights 2018. Contains public sector information licensed under the Open Government Licence v3.0

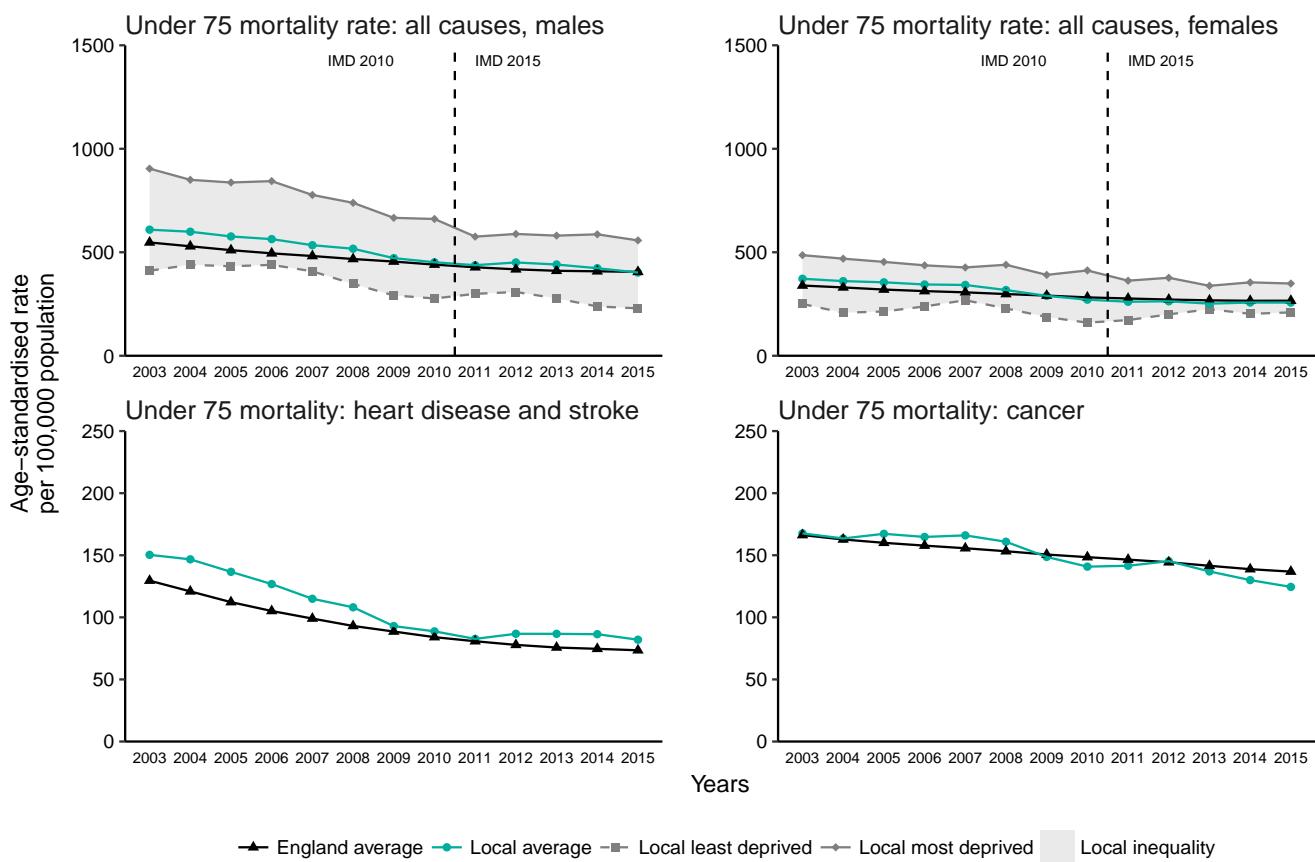
Health inequalities: life expectancy

The charts show life expectancy for males and females within this local authority for 2014-16. The local authority is divided into local deciles (tenths) by deprivation (IMD 2015). The life expectancy gap is the difference between the top and bottom of the inequality slope. This represents the range in years of life expectancy from most to least deprived within this area. If there was no inequality in life expectancy the line would be horizontal.



Trends over time: under 75 mortality

These charts provide a comparison of the trends in death rates in people under 75 between this area and England. For deaths from all causes, they also show the trends in the most deprived and least deprived local quintiles (fifths) of this area.



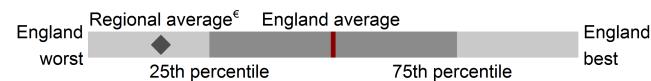
Data from 2010-12 onwards have been revised to use IMD 2015 to define local deprivation quintiles (fifths), all prior time points use IMD 2010. In doing this, areas are grouped into deprivation quintiles using the Index of Multiple Deprivation which most closely aligns with the time period of the data. This provides a more accurate way of examining changes over time by deprivation.

Data points are the midpoints of three year averages of annual rates, for example 2005 represents the period 2004 to 2006. Where data are missing for local least or most deprived, the value could not be calculated as the number of cases is too small.

Health summary for Wandsworth

The chart below shows how the health of people in this area compares with the rest of England. This area's value for each indicator is shown as a circle. The England average is shown by the red line, which is always at the centre of the chart. The range of results for all local areas in England is shown as a grey bar. A red circle means that this area is significantly worse than England for that indicator. However, a green circle may still indicate an important public health problem.

- Significantly worse than England average
- Not significantly different from England average
- Significantly better than England average
- Not compared



Indicator names	Period	Local count	Local value	Eng value	Eng worst	Eng best
1 Life expectancy at birth (Male)	2014 – 16	n/a	80.0	79.5	74.2	83.7
2 Life expectancy at birth (Female)	2014 – 16	n/a	83.8	83.1	79.4	86.8
3 Under 75 mortality rate: all causes	2014 – 16	1,628	324.4	333.8	545.7	215.2
4 Under 75 mortality rate: cardiovascular	2014 – 16	388	82.0	73.5	141.3	42.3
5 Under 75 mortality rate: cancer	2014 – 16	606	124.5	136.8	195.3	99.1
6 Suicide rate	2014 – 16	68	10.4	9.9	18.3	4.6
7 Killed and seriously injured on roads	2014 – 16	253	26.8	39.7	110.4	13.5
8 Hospital stays for self-harm	2016/17	240	81.4	185.3	578.9	50.6
9 Hip fractures in older people (aged 65+)	2016/17	129	436.1	575.0	854.2	364.7
10 Cancer diagnosed at early stage	2016	418	56.0	52.6	39.3	61.9
11 Diabetes diagnoses (aged 17+)	2017	n/a	61.6	77.1	54.3	96.3
12 Dementia diagnoses (aged 65+)	2017	1,438	71.8	67.9	45.1	90.8
13 Alcohol-specific hospital stays (under 18s)	2014/15 – 16/17	36	19.7	34.2	100.0	6.5
14 Alcohol-related harm hospital stays	2016/17	1,247	521.2	636.4	1,151.1	388.2
15 Smoking prevalence in adults (aged 18+)	2017	34,236	13.2	14.9	24.8	4.6
16 Physically active adults (aged 19+)	2016/17	n/a	71.7	66.0	53.3	78.8
17 Excess weight in adults (aged 18+)	2016/17	n/a	48.2	61.3	74.9	40.5
18 Under 18 conceptions	2016	77	21.2	18.8	36.7	3.3
19 Smoking status at time of delivery	2016/17	141	4.3	10.7	28.1	2.3
20 Breastfeeding initiation	2016/17	4,198	91.9	74.5	37.9	96.7
21 Infant mortality rate	2014 – 16	42	2.8	3.9	7.9	0.0
22 Obese children (aged 10–11)	2016/17	427	20.5	20.0	29.2	8.8
23 Deprivation score (IMD 2015)	2015	n/a	18.3	21.8	42.0	5.0
24 Smoking prevalence: routine and manual occupations	2017	n/a	29.5	25.7	48.7	5.1
25 Children in low income families (under 16s)	2015	8,275	16.7	16.8	30.5	5.7
26 GCSEs achieved	2015/16	1,067	64.4	57.8	44.8	78.7
27 Employment rate (aged 16–64)	2016/17	185,100	80.3	74.4	59.8	88.5
28 Statutory homelessness	2016/17	83	0.6	0.8		
29 Violent crime (violence offences)	2016/17	5,643	17.9	20.0	42.2	5.7
30 Excess winter deaths	Aug 2013 – Jul 2016	295	21.0	17.9	30.3	6.3
31 New sexually transmitted infections	2017	4,916	2,075.5	793.8	3,215.3	266.6
32 New cases of tuberculosis	2014 – 16	161	17.1	10.9	69.0	0.0

For full details on each indicator, see the definitions tab of the Health Profiles online tool: www.healthprofiles.info

Indicator value types

1, 2 Life expectancy - Years 3, 4, 5 Directly age-standardised rate per 100,000 population aged under 75 6 Directly age-standardised rate per 100,000 population aged 10 and over 7 Crude rate per 100,000 population 8 Directly age-standardised rate per 100,000 population 9 Directly age-standardised rate per 100,000 population aged 65 and over 10 Proportion - % of cancers diagnosed at stage 1 or 2 11 Proportion - % recorded diagnosis of diabetes as a proportion of the estimated number with diabetes 12 Proportion - % recorded diagnosis of dementia as a proportion of the estimated number with dementia 13 Crude rate per 100,000 population aged under 18 14 Directly age-standardised rate per 100,000 population 15, 16, 17 Proportion - % 18 Crude rate per 1,000 females aged 15 to 17 19, 20 Proportion - % 21 Crude rate per 1,000 live births 22 Proportion - % 23 Index of Multiple Deprivation (IMD) 2015 score 24, 25 Proportion - % 26 Proportion - % 5 A*-C including English & Maths 27 Proportion - % 28 Crude rate per 1,000 households 29 Crude rate per 1,000 population 30 Ratio of excess winter deaths to average of non-winter deaths (%) 31 Crude rate per 100,000 population aged 15 to 64 (excluding Chlamydia) 32 Crude rate per 100,000 population

€"Regional" refers to the former government regions.

If 25% or more of areas have no data then the England range is not displayed.

Please send any enquiries to healthprofiles@phe.gov.uk

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**APPENDIX 5:
PRIMARY HEALTHCARE PROVISION**

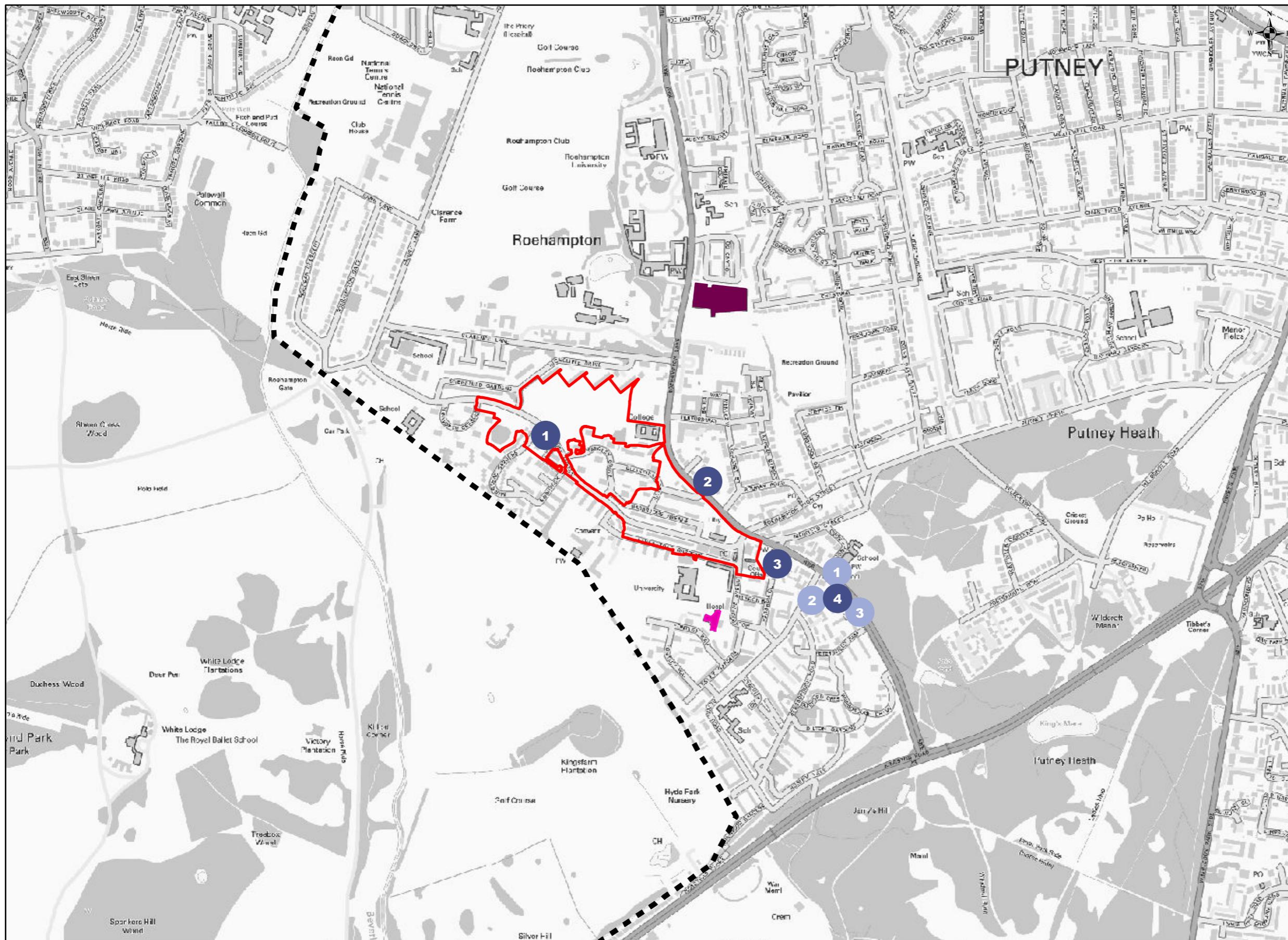


Figure 6.3

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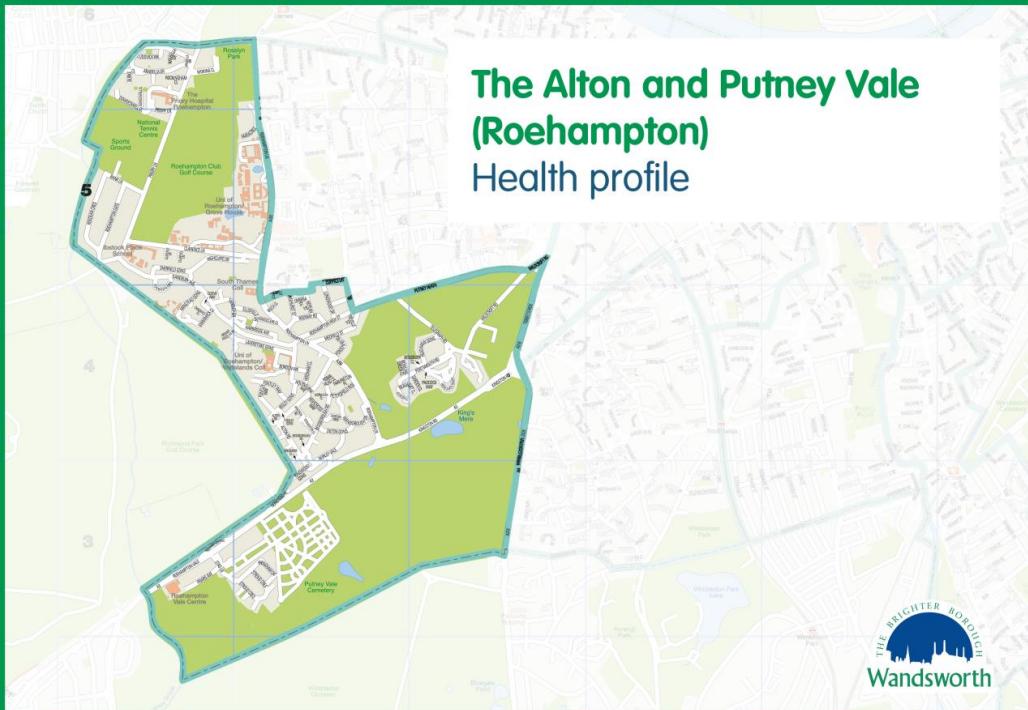
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APPENDIX 6:
**THE ALTON AND PUTNEY VALE (ROEHAMPTON) HEALTH
PROFILE**

The Alton and Putney Vale (Roehampton) Health profile



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Live Well	22
Age Well.....	26
Conclusion	28

Published 2018



Executive Summary

The aim of the Alton and Putney Vale health profile is to provide a baseline analysis to support the assessment and evaluation of changes to health and wellbeing over the course of the regeneration programme; as well as to inform the development and targeting of community level interventions.

Method

This profile draws on the lowest meaningful level of data available, to give the most representative picture of local health and wellbeing possible, using a range of local and national data sources. It draws on a greater breadth of indicators than previous work, to capture the wider influences on the health of the community.

Place

The Alton and Putney Vale includes areas that are amongst the 20% most deprived neighbourhoods in England and amongst the 10% most deprived with respect to income and housing. The Alton has a younger adult population compared to Wandsworth, whereas Putney Vale is more similar to Wandsworth. There is good access to green space but there is a perception that green spaces do not necessarily promote social interaction or provide facilities for children or young people. Access to fresh fruit, vegetables and meat is variable across the area with some areas having limited access to supermarkets or convenience stores within a 1-mile radius. This may cause particular difficulties for residents with limited mobility, those without access to a car and lone-parent families with young children.

Access to takeaway food, which is generally higher in calories, sugar and salt than food prepared at home, is also variable. When assessed against national Public Transport Accessibility criteria, the majority of areas on the Alton and Putney Vale are considered to have average access to public transport, although in some areas nearly half of residents have poor access. Levels of crime vary between areas within the Alton and Putney Vale. Compared with the rest of Wandsworth, rates of crime tend to be similar or higher, although compared to other estates, rates of some crimes are lower.

Start Well

Young people surveyed in the Alton and Putney Vale area report feeling safe in the places that they live and socialise, however crime figures show that they are more likely to be victims of crime than in other areas. Young people have access to youth and sports clubs on the estate but limited access to other social opportunities in the immediate area. A large proportion live in poverty and many live in lone-parent households, often where the parent is not in employment. The health of children and young people varies across the different parts of the estate with respect to things like vaccination coverage and emergency admissions to hospital.



Childhood obesity appears to be going down, but there is still work to be done to bring levels in line with the Wandsworth average. How well young people do at school varies depending on the school that they attend, and whether they are from a deprived background, but some children do better than their peers, despite living in areas of greater deprivation. The most common languages spoken by children living in the Alton and attending Wandsworth schools are the same as those for Wandsworth. However, there is a lower proportion who speak English as a first language and higher proportions of Urdu, Somali, Polish and Arabic.

Live Well

The average life expectancy of men and women living in the Alton and Putney Vale area is lower than the Wandsworth average and both men and women spend fewer years in good health. The health of the adult population tends to be poorer than the Wandsworth average, although it is often better than the National average. There are more people registered with learning disabilities and serious mental health conditions living in the area than in other areas in Wandsworth. More than half of the housing on the Alton is social housing. Nearly 30% of households on the Alton are overcrowded and a high number have 6 or more occupants. Residents are more likely to be long-term unemployed across the Alton and Putney Vale than for Wandsworth generally.

Age Well

There are around 900 older people living on the Alton and in Putney Vale, and many of them live alone. Nearly a quarter of the households where an older person lives alone are part of sheltered housing schemes. Whilst the housing stock has a low level of falls hazards, there are more emergency admissions to hospital for hip fractures than should be seen given the age-profile of the area, and also higher levels of dementia. It is likely that the poorer health seen in the adult population persists into older age, contributing to these poor outcomes amongst older people, as well as to shorter life expectancy.



Method

Background

The Council launched its Aspirations Programme in 2013 with an ambition to regenerate neighbourhoods, create more homes, help people into work and encourage them to aspire to better, safer, healthier lives. The Alton Estate in Roehampton is one of two key aspiration areas in Wandsworth, both of which are undergoing a programme of regeneration. The regeneration programme will provide more high-quality housing in the area, a better choice and mix of homes, an improved environment, new community and retail facilities, and improved transport and access, all of which will help to support a more vibrant, healthy and sustainable community.

The aim of the Alton health profile is to provide a baseline analysis to support the assessment and evaluation of changes to health and wellbeing over the course of the regeneration programme; as well as to inform the development and targeting of community level interventions.

The inclusion of the Putney Vale in the scope of the work is based on the location of many of the Putney Vale's community resources (such as primary healthcare) being located in the Alton area and, as such, there being a close link between the health and wellbeing of the Putney Vale community and the Alton regeneration programme.

Data Sources

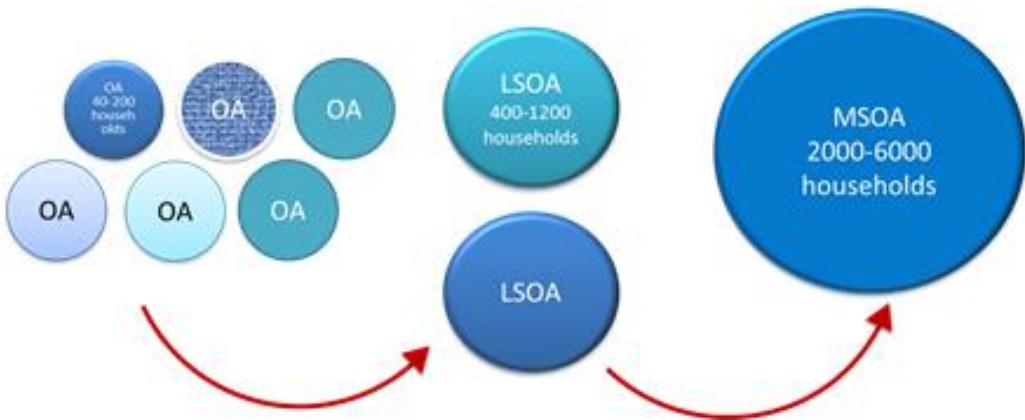
The Alton estate sits within Roehampton and Putney Heath Ward. The surrounding parts of the ward are relatively more affluent and less deprived than the Alton and this means ward level data is not as representative of the local area as it is for other areas. The profile has therefore sought to identify data that go below ward level, using a range of local and national data sources. The main sources of data used include:

- 2011 Census
- ONS Population Projections
- NOMIS official labour market statistics
- NHS Quality Outcomes Framework
- PHE Local Health
- English indices of deprivation 2015
- Local services (e.g. children's services, council tax benefits, Work Match)
- Qualitative data from stakeholder and community conversations (quotes included)
- Projected modelling based on similar areas



Levels of Data

Data is often broken down into small geographic areas called Output Areas (OAs). OAs are small geographic areas which group together households that are socially similar. OAs are also grouped into larger geographical areas called Lower Super Output Areas (LSOAs) and Middle Super Output Areas (MSOAs). These areas then group up into Wards within a Local Authority. In the Alton and Putney Vale area, there are 29 Output Areas, 5 LSOAs and 2 MSOAs. The larger the area the data is describing the less it will reflect accurately the real-life experiences of people living in their local communities, and the more likely it is that it will include people who do not live in the specific community you are looking at.



Local geographies

The key focus of the health profile is the Alton regeneration area (highlighted in red below), however where available, data on the Putney Vale area has been included separately to enable comparison.

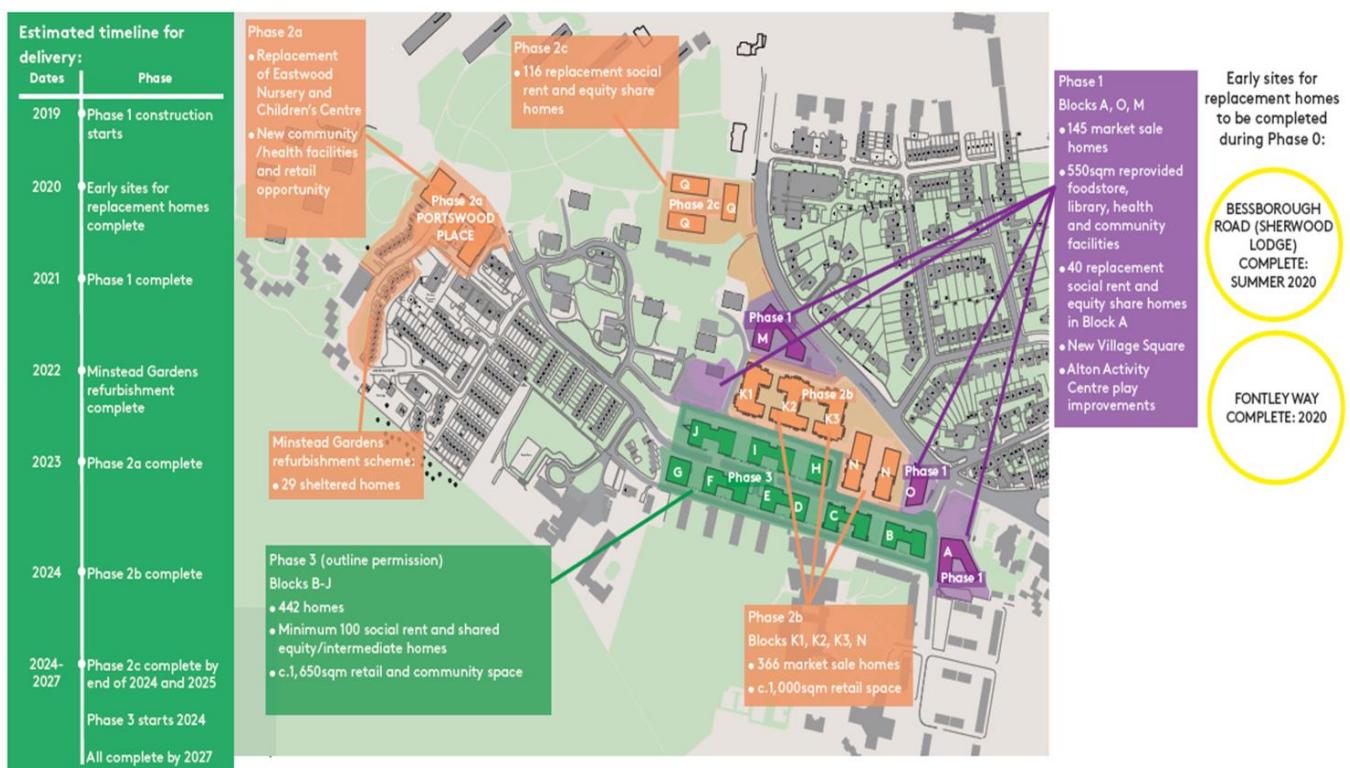
Figure 1: Small area geographies



Regeneration Area

The Council launched its Aspirations Programme in 2013 with an ambition to regenerate neighbourhoods, create more homes, help people into work and encourage them to aspire to better, safer, healthier lives. The Alton Estate (West) is one of two key Aspiration Areas in Wandsworth, both of which are undergoing a programme of regeneration.

Figure 2: Regeneration area and phasing development proposals



The regeneration programme will provide over 1,000 new homes with associated social infrastructure such as a new library centre, children's centre facilities for young people, new health facilities and improved park. The Council is committed to providing all social tenants and resident leaseholders with homes in the new neighbourhood should they wish to stay. The redevelopment will provide 256 affordable units, once all the residents who wish to be rehoused in the scheme have been accommodated, any surplus homes will be returned to the council to be allocated to residents to whom the council owes a duty to rehouse.



Data Caveats and Considerations

As with all population-level data, there are caveats around how robust the accessible data is, and some indicators and datasets that have been used will be more up-to-date and reliable than others. Where relevant, significant caveats to the data are highlighted in the report (this is to give the reader an indication of the level of uncertainty in the data). Data sources, year of publication and the level at which the data are available are included in the references at the end of this document.

Not all health and wellbeing information is available in a smaller geographic area. Where data is only available at Borough level these have generally not been included within the profile. Therefore, for example, the report does not include data on levels of adult smoking or breastfeeding, even though these are likely to be key issues for the area.



Place

Population
9777



‘A beautiful setting’



Access to Transport average/poor



Above average
satisfaction with the local area

Below average
sense of belonging and neighbourliness



The Alton and Putney Vale includes areas that are amongst the 20% most deprived neighbourhoods in England and amongst the 10% most deprived with respect to income and housing. The Alton has a younger adult population compared to Wandsworth, whereas Putney Vale is more similar to Wandsworth. There is good access to green space but there is a perception that green spaces do not necessarily promote social interaction or provide facilities for children or young people. Access to fresh fruit, vegetables and meat is variable across the area with some areas having limited access to supermarkets or convenience stores within a 1 mile radius. This may cause particular difficulties for residents with limited mobility, those without access to a car and lone-parent families with young children.

Access to takeaway food, which is generally higher in calories, sugar and salt than food prepared at home, is also variable. When assessed against national Public Transport Accessibility criteria, the majority of areas on the Alton and Putney Vale are considered to have average access to public transport, although in some areas nearly half of residents have poor access. Levels of crime vary between areas within the Alton and Putney Vale. Compared with the rest of Wandsworth, rates of crime tend to be similar or higher, although compared to other estates, rates of some crimes are lower.

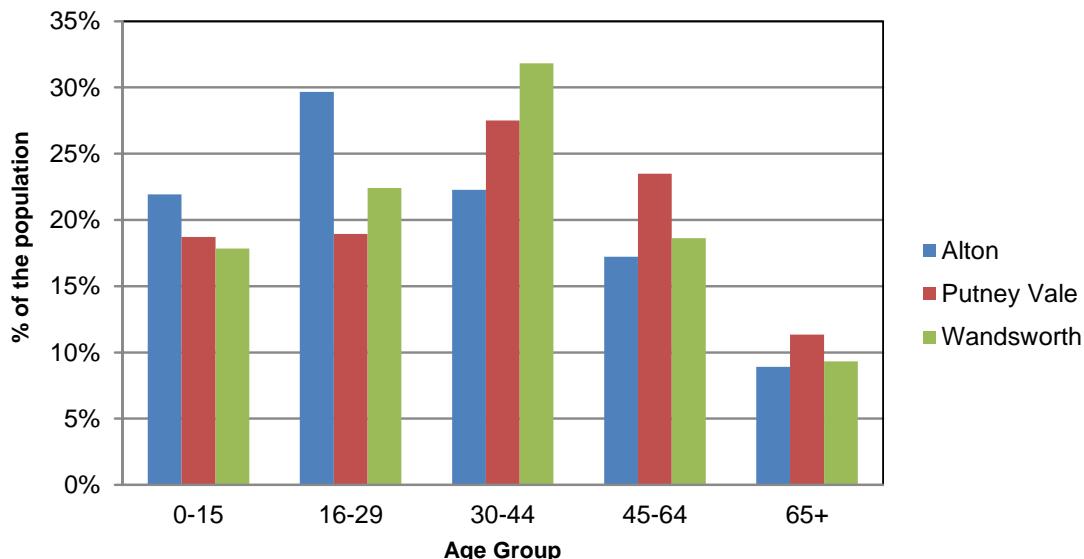
Population

- Around 9777 people live in the Alton and Putney Vale area; approximately 8057 on the Alton and 1720 in the Putney Vale area (LSOA 23D).
- Considerably more 16-29 year olds and fewer 30-44 year olds live on the Alton than the Wandsworth average. Whereas in Putney Vale, there are fewer 30-44 year olds, but considerably more 45-64 year olds compared to the Wandsworth average.¹
- Nearly 40% of Alton residents are from Black and Minority Ethnic (BME) groups compared to 31% in Putney Vale and 30% across Wandsworth.



- A higher proportion of the community in Putney Vale are from White ethnic groups (69%) than on the Alton (60%), and a higher proportion are from Other White ethnic groups (26% compared to 18% on the Alton).

Figure 3: Alton and Putney Vale age profile (mid-2015 projections)

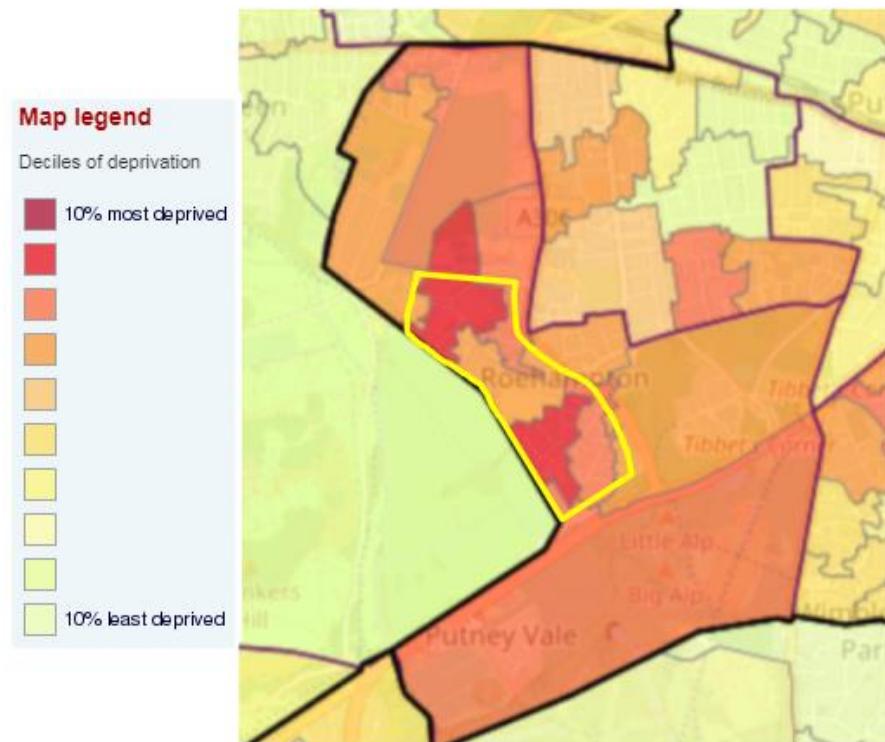


Deprivation

- The Indices of Deprivation 2015 provide a set of relative measures of deprivation for small areas across England, based on domains such as income, health, and housing. The domains are combined to produce the overall Index of Multiple Deprivation which is presented as a rank – 1 being the most deprived area out of a total of 32,844 in England. Wandsworth is ranked as 147th out of 326 local authorities in England (1 being the most deprived local authority).
- Around 42% of the population (4150 people) live in areas that are amongst the 20% most deprived neighbourhoods in England (LSOA 13B and 23B). These are the 8th and 11th most deprived neighbourhoods in Wandsworth. The other local areas are ranked amongst the 30% (LSOA 23C&D) and 40% most deprived neighbourhoods in England (LSOA 23A).
- Around 61% of the population live in areas that are amongst the 10% most deprived in England with respect to income deprivation affecting children and older people (LSOA 13B, 23B&C).
- All the areas in Alton and Putney Vale are in the 10% or 20% most deprived neighbourhoods in England with respect to barriers to housing and services.²



Figure 4: Index of Multiple Deprivation by LSOA



Green space

- The Alton and Putney Vale are set within large expanses of green space and in close proximity to Richmond Park, Putney Heath and Wimbledon Common. Mapping undertaken in 2010 demonstrated that most areas on the Alton and Putney Vale fall within 400m of designated play facilities, although there is an area around the Alton primary school which falls outside this catchment area for facilities for 12-18 year olds. No 'free play deprived areas' were identified on the estate for ages 5-11 or 12-18 years. However, despite this, some of the community conversations have highlighted a perception that there is "not enough useable green space" for example playgrounds for children, facilities for young people or areas that encourage the community to congregate socially.

Social aspects

- Although this survey wasn't done locally, the views of people from areas elsewhere in the country that are similar to the Alton show that, compared to the national average, there is likely to be:
 - Above average satisfaction with the local area as a place to live



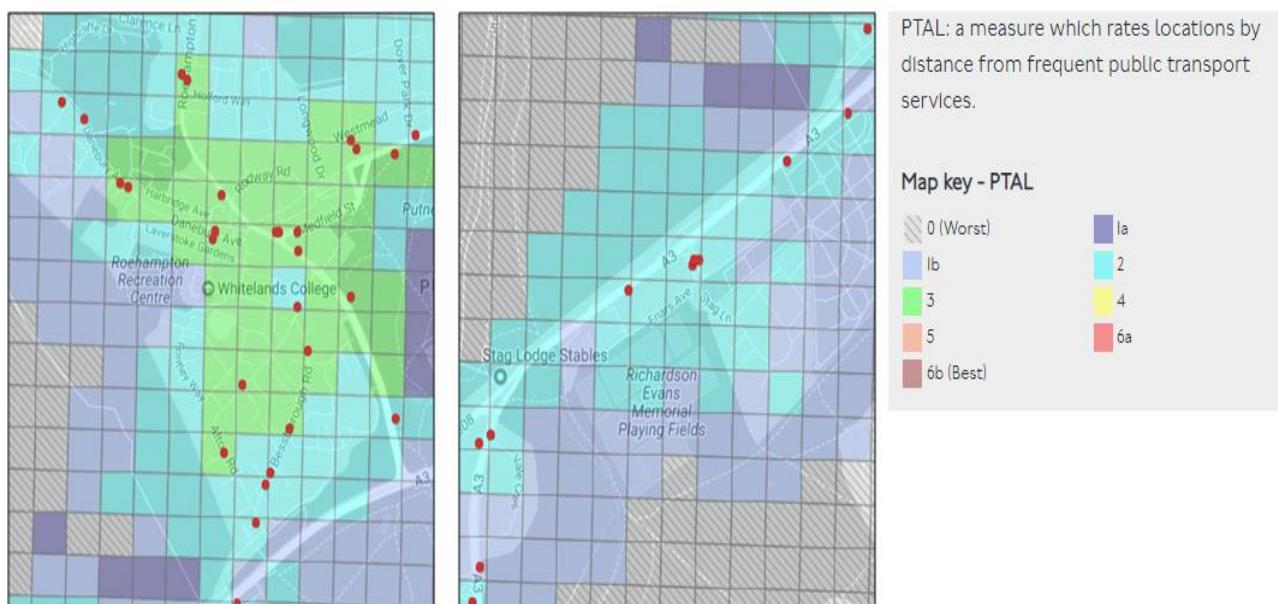
- Average sense that the local area was a place where people from different backgrounds get on well together.
- Below average sense of belonging and neighbourliness (including local friendships and a sense of being able to rely on, borrow from or trust neighbours)
- Below average number of people intending to remain resident in the neighbourhood for a number of years
- Residents may also be more likely to have contacted a local councillor or MP but less likely to have contacted the council

NOTE: These data are based on a modelling exercise undertaken by Social Life in 2014; they do not use data from people living in the local area and are therefore only a prediction of what local views might be.

Transport

- The majority of areas in Alton and Putney Vale are considered to have average access to public transport (PTAL score 2-3, shaded turquoise and green), which is similar to the Wandsworth average. However, in some areas, nearly half of residents have poor access (PTAL score 1, shaded light and dark purple).³⁴ Note that none of the local areas have levels of access graded as 4 or above.

Figure 5 & 6: Public Transport Accessibility Levels (PTAL) on The Alton (right map) and Putney Vale (left map)



Crime

- There have been small reductions to the rates of **knife crime**¹ on the Alton year on year over the last four years, and rates are now similar to the borough average. Having previously been higher in comparison to some other estates, rates are now lower (compared with Henry Prince and Winstanley for instance). However, the small numbers involved combined with the potential for them to vary year to year make meaningful comparison difficult. In 2016/17 there were 8 reported knife crimes on the Alton. There was one reported knife crime in Putney Vale in 2016/17, with 0 reported knife crimes in each of the preceding 3 years.⁵ Note that data presented here should be taken as indicative due to the way crime figures are collected and recorded.
- Rates of **antisocial behaviour (ASB) and theft** on the Alton are also similar to the Wandsworth average and lower than some other estates (e.g. Patmore and Henry Prince), but in Putney Vale, they are considerably higher. In 2016/17, there were 70 reports of ASB per 1000 population and 74 reports of theft per 1000 population in the Putney Vale area – compared to 26 and 35 respectively for the whole of Wandsworth. There is also a small area within the Alton that has a very high number of thefts. In both cases, the location of nearby business premises are believed to play an influencing role – with crime and disorder (particularly of this nature) expected to occur at these inflated levels around particular types of business venue.⁵
- Rates of reported **domestic violence** are high in some areas of the Alton; considerably higher than for Wandsworth and also higher than a number of other estates (e.g. Doddington). However, in Putney Vale, they are much lower than the Wandsworth average. In 2016/17 there were 127 reported domestic violence crimes on the Alton and Putney Vale.⁵ Considerable work has been undertaken on the Alton to raise the profile of Domestic Violence, and there is strong engagement from professionals such as GPs and Health Visitors. This may contribute to the high rates of reporting around domestic violence, if the community feels more able to seek support.
- For the past two years, Roehampton and Putney Heath Ward has had the highest rate of crimes involving **violence with injury** in the borough, although a significant proportion of incidents take place between parties known to one another in some form, rather than as random violence.⁵
- Historically, **gang activity** and the use/supply of drugs has been in evidence within parts of the Alton Estate. The Police gangs team, alongside partners including the Local Authority, continue to focus work on the estate to mitigate and reduce this activity.

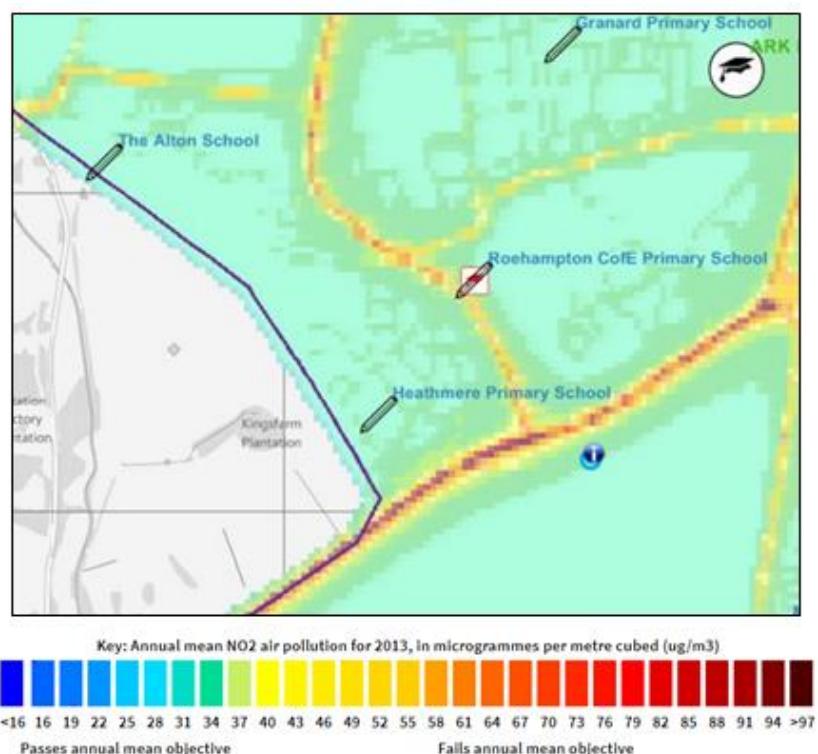
¹ For the avoidance of doubt, knife crime is defined as any of the following named offences where a knife has been used as weapon, used as a threat, or intimated to be present (and victim convinced it was so): Murder, Attempted Murder, Threats to Kill, Manslaughter, Infanticide, Wounding or carrying out act endangering life, Wounding or inflicting Grievous Bodily Harm (GBH) without intent, Actual Bodily Harm (ABH), Sexual Assault, Rape or Robbery. In practice, the majority of reported knife crime offences are classified either as Wounding, GBH, ABH or Robbery.



Air pollution

- Air pollution has an impact on everyone's health. The young, the elderly & those with certain medical conditions are most susceptible and more deprived communities tend to be the most exposed. The main source of air pollution nationally is road traffic.
- Neither of the primary schools on the Alton estate, nor the local secondary school fall within areas that breach air pollution (Nitrogen Dioxide – NO₂) limits. However, Roehampton C of E Primary School, located next to Roehampton Lane, has areas within and near its school grounds that exceed the limits. Ongoing monitoring work is being undertaken with the school.

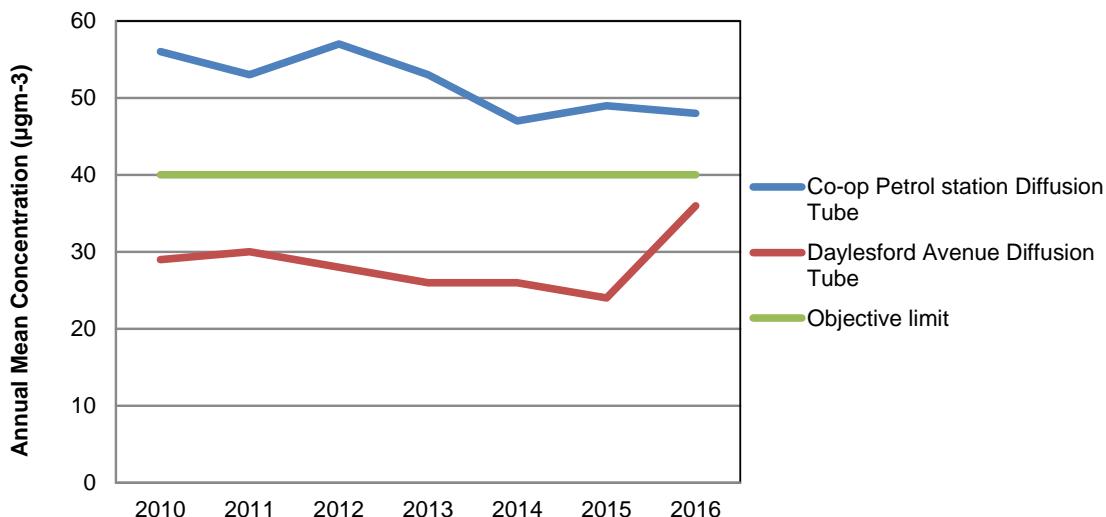
Figure 7: Air pollution map and local schools (N02)



- The closest routine air pollution monitors to the Alton and Putney Vale are adjacent to the Co-op Petrol station in Putney Vale and on Daylesford Avenue (near Barnes Station).



Figure 8: Local air pollution readings

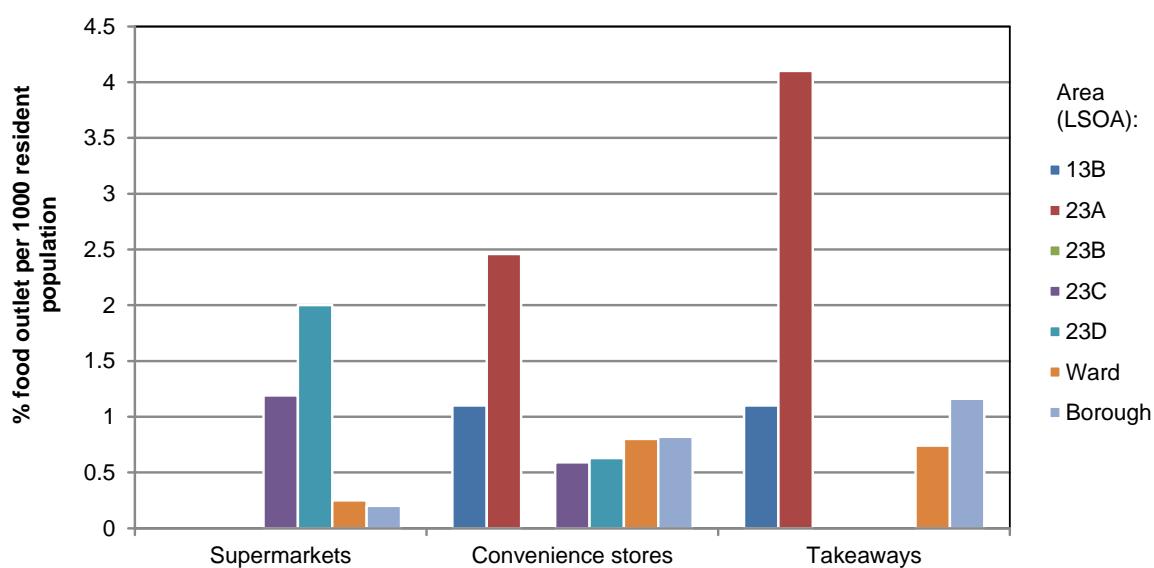


NOTE: Measuring air pollution levels is complex and these data should be taken as indicative only, particularly with respect to diffusion tube readings for which known poor data capture affects accuracy.

Food environment

- Many parts of the Alton are considered to have no accessible supermarkets or convenience stores within a 1-mile radius. However, the areas closest to the Asda (e.g. Putney Vale) have considerably higher levels of access than the ward or borough.

Figure 9: Access to food



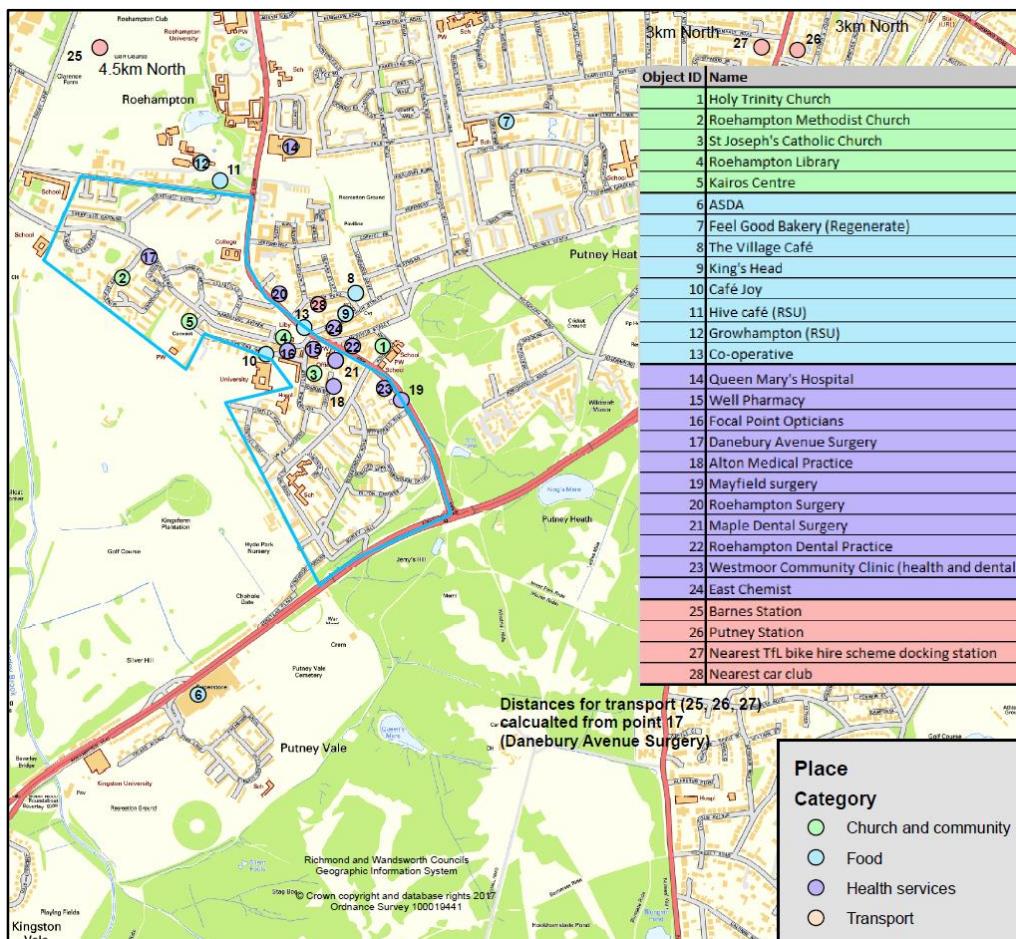
- There is also marked variation across the Alton and Putney vale areas with respect to access to takeaway outlets. Some areas, including Putney Vale, have no takeaways within a 1-mile radius, whilst others (LSOA 23A) have large numbers of takeaways, with 4.1 outlets per 1000 population. The borough average is 1.16 takeaway outlets per 1000 population.

NOTE: LSOA 23A includes an area on the other side of Roehampton Lane, outside of the estate, encompassing a stretch of Roehampton High Street (see Figure 1).

Licensing

- There are 3 public houses, 2 restaurants/cafes and 19 supermarkets/corner shops in the wider area that are licensed to sell alcohol and tobacco products. There are no current issues with sales to minors or illicit alcohol or tobacco sales.

Figure 10: Community resources map – Place

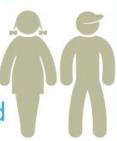


NOTE: The community resources identified in the maps are mapped on the centre of postcode areas and are therefore indicative only. The resources identified may not be exhaustive but are intended to give an indication of the spread and location of community resources. Community resources specific to life stages are mapped in later sections.



Start Well

21%
Aged
0-15
years old



Children's Centre
exceeding
Ofsted target
for engaging
target families

**15% of households are
lone parent households.**

Double the
Wandsworth
average.



Emergency
hospital
admissions
for children under 5
**lower than
Borough average**



Young people surveyed in the Alton and Putney Vale area report feeling safe in the places that they live and socialise, however crime figures show that they are more likely to be victims of crime than in other areas. Young people have access to youth and sports clubs on the estate but limited access to other social opportunities in the immediate area. A large proportion live in poverty and many live in lone-parent households, often where the parent is not in employment.

The health of children and young people varies across the different parts of the estate with respect to things like vaccination coverage and emergency admissions to hospital. Childhood obesity appears to be going down, but there is still work to be done to bring levels in line with the Wandsworth average. How well young people do at school varies depending on the school that they attend, and whether they are from a deprived background, but some children do better than their peers, despite living in areas of greater deprivation.

Population

- There are around 2088 children and young people aged under 15 living in the Alton and Putney Vale area, representing 21% of the local population. A third of households have dependent children.⁶
- 15% of households on the Alton are lone-parent households, which is more than double the Wandsworth average of 6%; 9% of households in Putney Vale are lone-parent households.
- Lone-parent households can face a number of additional challenges, particularly in relation to income and employment. On the Alton, 55% of lone-parent households are not in employment and 50% in Putney Vale, this equates to 300 households and 18 households respectively.⁷

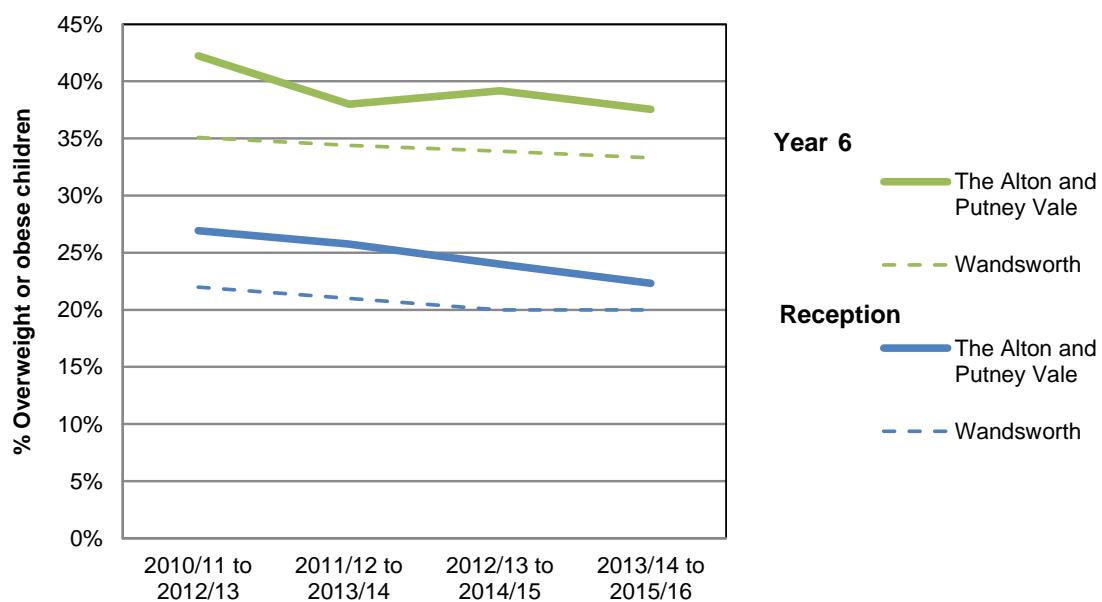


- At the Ward level, 38% of children live in povertyⁱ compared to 21% across Wandsworth.⁸

Health

- The proportion of children in Reception that are **overweight or obese** has been consistently declining over the past 6 years and is now 22.3%; but remains higher than the Wandsworth average (19.6%). This statistically significant decline reflects the national downward trend for this age group.
- Excess weight has also declined amongst children in year 6 since 2010/11, but less consistently and the difference is not statistically significant; 37.6% of children in year six are overweight or obese, which is higher than the Wandsworth average (33.3%). Nationally the trend for overweight and obesity in this age group has been upward.⁹ The reasons behind these local declines are likely multi-faceted. However, these data demonstrate positive changes in the trends for younger children and highlight the need for continued efforts to maintain and accelerate this trend, particularly amongst older primary school children.

Figure 11: Childhood obesity (excess weight)



ⁱ Definition: Proportion of children living in families in receipt of out-of-work benefits or in receipt of tax credits where income is less than 60 per cent of UK median income



- Data on **dental decay** in children is not available below borough level. In Wandsworth, 23.3% of children have dental decay which is similar to the national average and better than the London average.¹⁰ However, dental decay is often linked to levels of deprivation, and may therefore be more of an issue in the Alton and Putney Vale area. This would be in line with anecdotal evidence from services working in the local area.
- The average number of **emergency hospital admissions for children** aged under 5 years in the area is 119.5 per 1000 population, compared to 106.9 per 1000 population for Wandsworth as a whole.¹¹
- **Teenage Pregnancy** rates in Roehampton and Putney ward are not significantly different to the Wandsworth average.
- The **Measles, Mumps and Rubella (MMR) vaccine** is a very safe and effective vaccine that should be given to children around their first birthday and again before they start school. It is very important that children receive both doses to ensure they are fully protected. The proportion of children who have received both doses of the vaccine by their 5th birthday varies between 62.7% and 95.7% across the four local GP practices. Two of the practices are exceeding Wandsworth and London averages, but two are achieving considerably lower coverage than Wandsworth and London.¹²

Child development and attainment

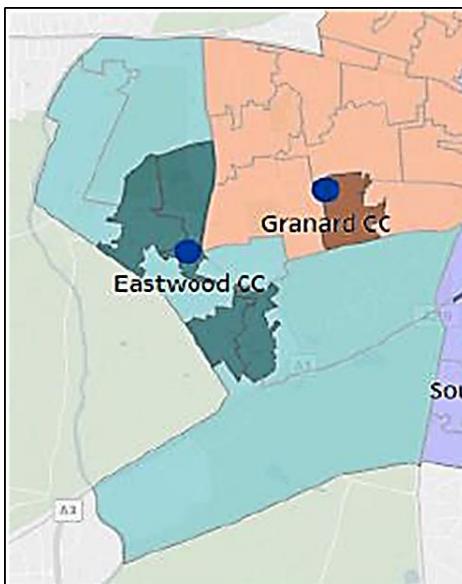
- Eastwood **Children's Centre** is engaging with two thirds of children aged under 3 living in the most deprived local 'target' areas (see Figure 12). This exceeds the Ofsted target for engaging with target families.¹³
- Two thirds of '**Children in Need**' ⁱⁱ aged under 3 from Roehampton and Putney Heath Ward, live on the Alton.¹³
- A much lower proportion of children are reaching expected levels in the two local **primary schools** ⁱⁱⁱ (The Alton and Heathmere) than the Wandsworth average (62% and 46% compared to 69%). More than half the pupils in each school have been eligible for Free Schools Meals at some point in the past six years.¹⁴
- The percentage of children who are persistent absentees is much higher at Heathmere (17%) and at the Alton than the Wandsworth average (9%).
- The percentage of children who are persistent absentees is much higher at Heathmere (18%) than the Wandsworth average (9%) or at The Alton (8%).¹⁵

ⁱⁱ Definition: Children in Need are defined as children receiving social services support.

ⁱⁱⁱ Only the two main primary schools directly on the Alton have been included in our analysis. However, it is acknowledged that some children will attend schools on the periphery of the area, and similarly some children from outside of the area will attend school on the Alton.



Figure 12: Children Centre Targets Areas (darker colours)



- **Secondary school** students at Ark Putney Academy (APA) achieve similar average results at GCSE compared to Wandsworth and the gap between disadvantaged students and others is smaller than the average gap across all Wandsworth schools. The percentage of students that are persistent absentees at APA (16%) is very close to the Wandsworth average (12%).¹⁶

In October 2017, a Youth Survey (conducted by the Wandsworth Youth Services) was undertaken with 11-19-year olds through Roehampton Youth Club (the BASE) on the Alton. The survey had 68 responses and identified a number of key themes:

- The vast majority of respondents reported feeling 'safe' or 'somewhat safe' in the area they live in, with the majority feeling 'safe'. Some areas on the Alton were identified where young people reported they did not feel comfortable but the majority felt comfortable in all areas of Roehampton;
- Less than 20% of respondents reported being bullied or knowing anyone that had been bullied;
- A third of the young people responding said they were aware of gangs in the area;
- 63 out of the 68 responses said that nobody had ever offered them drugs.



University

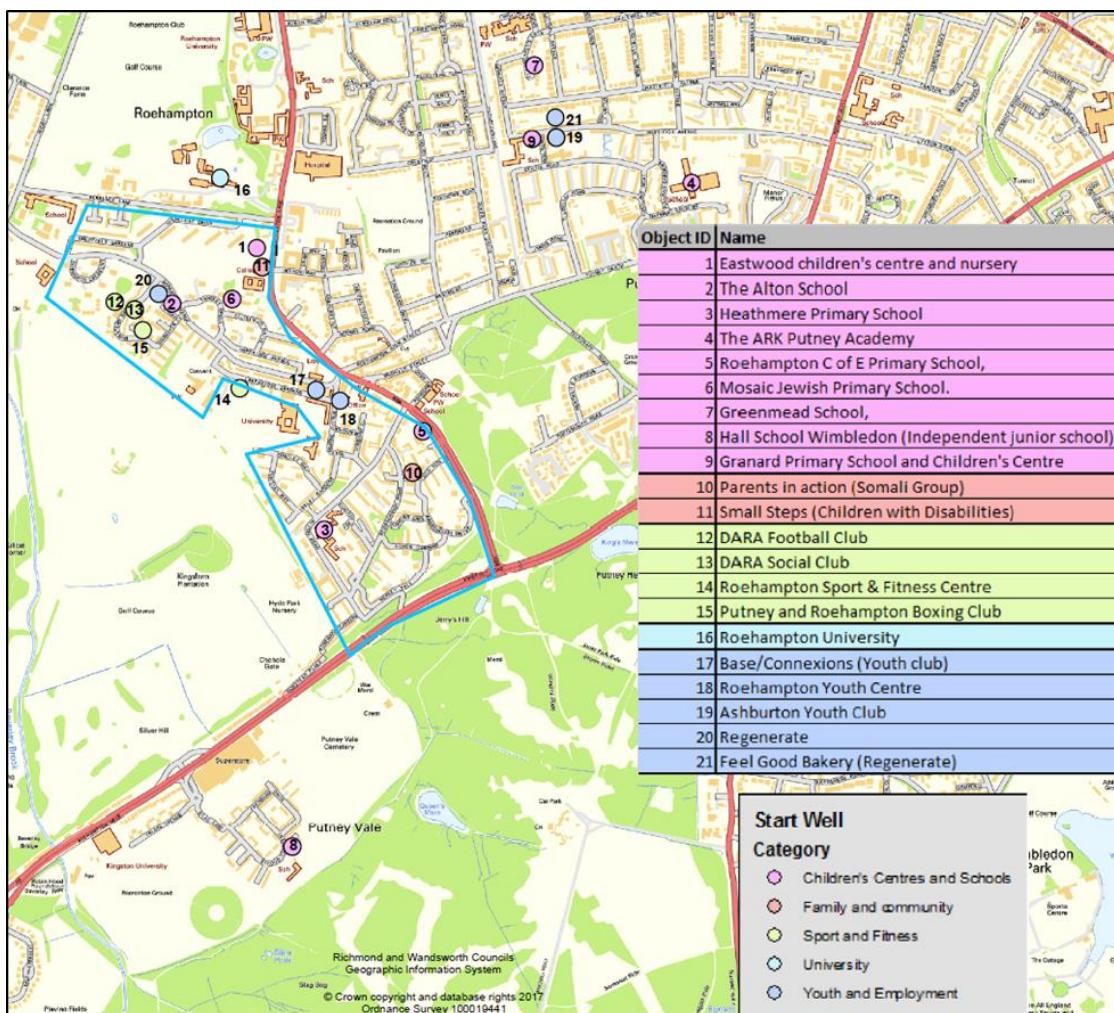
- The University of Roehampton's main campus is situated on Roehampton Lane. There are over 10,000 students enrolled at the university. Over 70% of students are female (due to the profile of courses offered) and 38% are from Black and Minority Ethnic (BME) groups. The majority of students (70%) are under 25 years old.¹⁷
- Although the university campus does not sit directly within the regeneration area, many students live in the local area. Students have their own specific health needs, particularly around emotional health, lifestyle behaviours (e.g. alcohol consumption), and sexual health; but despite this, there is often a lack of contact with services.¹⁸ A large student population also has an impact on the social environment of the area.
- There is the potential to strengthen the links between the Roehampton University student body and the community, for example through developing mentoring opportunities.

Crime

- Two specific areas in the Alton have the 2nd and 3rd highest (of 179) number of residents aged 10-17 in the borough who have been victims of crime (based on the home address of the victim).¹⁹
- Over the past year, an experimental piece of work has been undertaken in Wandsworth attempting to make best use of available data (crime figures, ambulance data, deprivation, census data etc.) and better understand vulnerability within our communities. Using the methodology, the 179 local areas within Wandsworth have been ranked from various perspectives. When focusing on young people, one area within the Alton ranks highest in the borough in terms of vulnerability. At present, this work remains in the development stage and should therefore be interpreted with caution.²⁰



Figure 13: Community resources map (Start Well)



Live Well



The average life expectancy of men and women living in the Alton and Putney Vale area is lower than the Wandsworth average and both men and women spend fewer years in good health. The health of the adult population tends to be poorer than the Wandsworth average, although it is often better than the National average.

There are more people registered with learning disabilities and serious mental health conditions living in the area than in other areas in Wandsworth. More than half of the housing on the Alton is social housing. Nearly 30% of households on the Alton are overcrowded and a high number have 6 or more occupants. Residents are more likely to be long-term unemployed across the Alton and Putney Vale than for Wandsworth generally.

Health

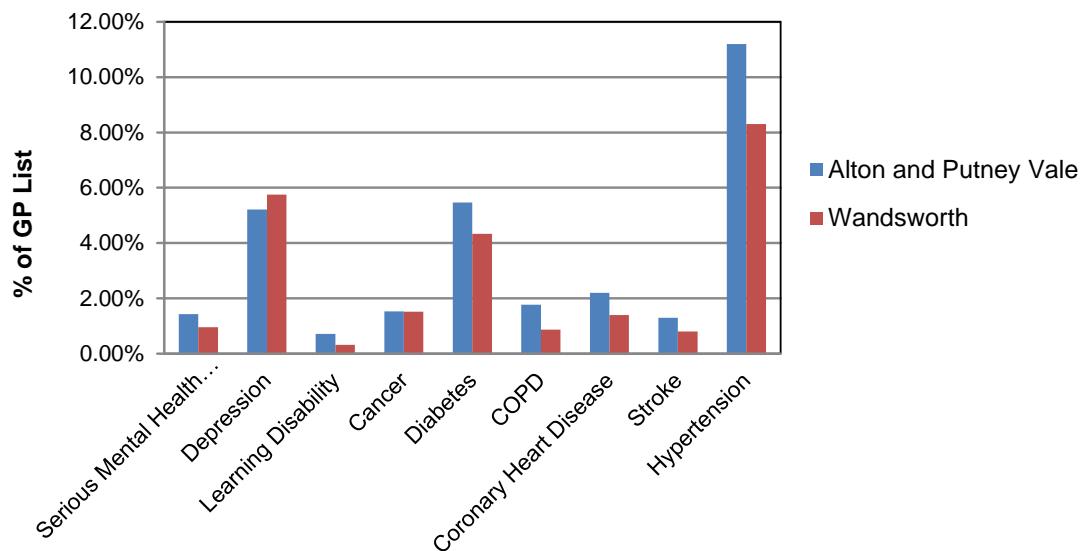
- Average **life expectancy** is around 76 years old for men and 82 years old for women, this is lower than the Wandsworth averages of 79 and 83.²¹
- 16% of Alton residents describe themselves as having a **long-term health problem or disability**, compared to 14% in Putney Vale and 11% across Wandsworth. However, as this is a self-defined category, it is difficult to unpick how different cultural or socioeconomic backgrounds may affect how people respond.²²
- There are around 135 people with a **learning disability** registered to a local GP. The proportion of people with a **learning disability** significantly higher than the Wandsworth average (0.7% of the registered GP list, compared to 0.3% across Wandsworth).
- 289 people registered with one of the four local GPs were living with **cancer** in 2015/16, this accounts for 1.5% of the population, which is the same as the Wandsworth average.²³



- The number of people living with **respiratory** diseases such as COPD (chronic obstructive pulmonary disease) commonly linked to smoking, **high blood pressure** (hypertension), **heart disease**, and that have had a **stroke** are considerably higher than the Wandsworth average (Figure 14).²²

NOTE: Data based on patients registered with the four local GPs will include people that do not live on the Alton or in Putney Vale. There are 18,930 patients registered across the four local GPs.

Figure 14: Clinical prevalence of health conditions



- 18% of adults in the area are estimated to be **obese**. This is slightly higher than the Wandsworth average of 15%. *NOTE: This is modelled data based on 2008 surveyed prevalence and therefore has a high level of uncertainty.*²⁴
- The estimated proportion of people undertaking 30 minutes of moderate **physical activity** once a week is classed as 'middle to high' (around 40%) although this is lower than the Wandsworth estimate which is classed as 'high'.²⁵
- Substance misuse**, and particularly alcohol misuse, is an issue that has been raised by both services and community representatives. The Wandsworth Community Drug and Alcohol Service (WCDAS) did have a presence at Roehampton High Street and offered specialist advice and support for people with drug and alcohol dependency. However, uptake of services at the site was low compared with services delivered through primary care (e.g. Danebury Avenue Surgery). There is some evidence that suggests proximity



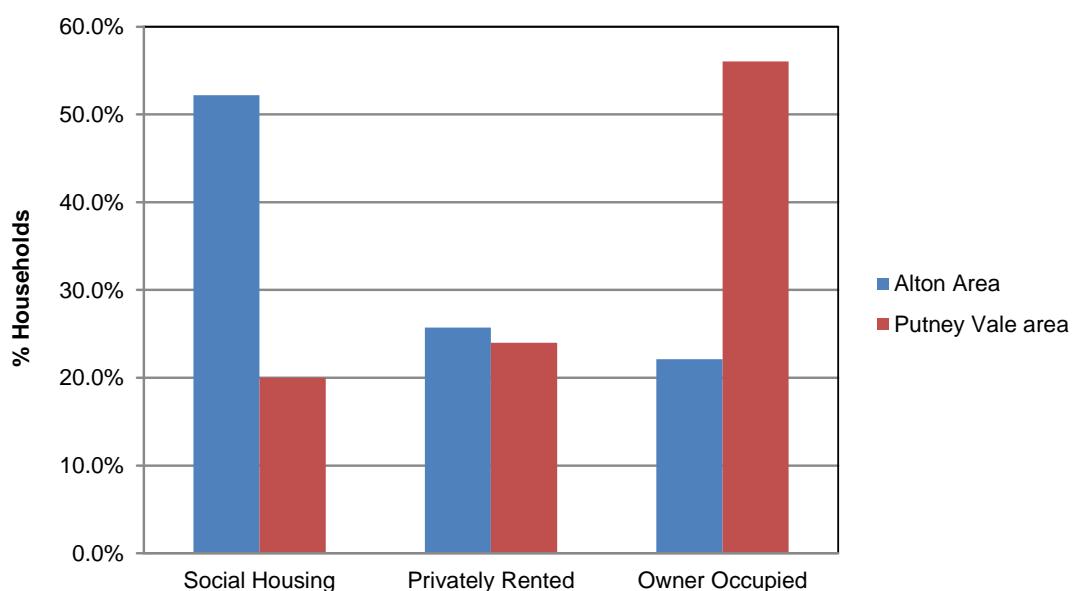
can be an important factor in accessing treatment services.^{26, 27} Anecdotally the low uptake at Roehampton WCDAS could have been because Roehampton Lane acts as a psychological barrier for people living on the Alton, or because people are unaware of the service. In 2016/17, 38 people in the Alton and Putney Vale area received structured treatment for alcohol dependency, and 47 people for drug dependency.²⁸

- Data on avoidable/accidental deaths is not available at the small area level.

Housing

- More than half (52.2%) of housing on the Alton is social housing (housing owned by the local authority or a housing association), compared to 20% in the Putney Vale area (Figure 15).²⁹
- The proportion of housing in disrepair (assessed against the decent homes standard criteria) is estimated to be slightly higher in privately rented stock (6%) compared to social housing stock (5%) and is slightly higher on the Alton compared to Putney Vale (5% and 4% respectively). These are similar to Wandsworth and national averages (5%).²⁸
- A higher number of households in both areas have 6 or more occupants than average. 28.2% of households on the Alton are overcrowded. Overcrowding in Putney Vale is 18.1% and is lower than the Wandsworth average (20%).³⁰

Figure 15: Households by tenure type (modelled estimates 2015)



Mental health

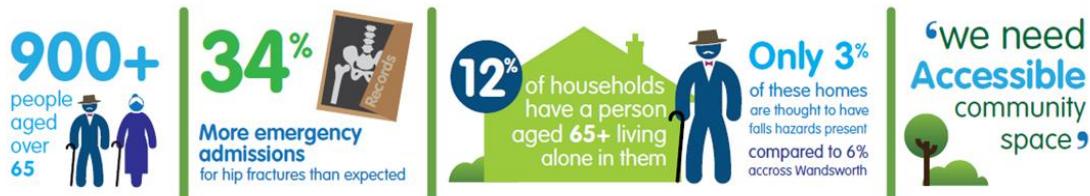
- The prevalence of serious mental health conditions (such as bipolar disorder and psychoses), amongst people registered with Alton GPs, is significantly higher than the Wandsworth average (1.4% compared to 0.95%). This reflects the feedback from local services which identified mental health as a key issue within the community.²²
- The number of cases of diagnosed depression is similar to the Wandsworth average.²² It is important to know that other factors such as stigma and social or cultural norms can influence whether people suffering from depression present for diagnosis and treatment, and therefore can influence local prevalence estimates.

Employment and benefits

- 10.2 people per 1000 working age population in the Alton area are claiming **Jobseekers Allowance**, and 6.6 per 1000 in Putney Vale. The Wandsworth average is 9.4.³¹ 4.9 people per 1000 working age population have been **unemployed for over a year** across both areas compared to 4.0 across Wandsworth (data not available for each area separately).³²
- Work Match** delivers Employment Support Services in Roehampton under the brand Work Match Roehampton. This is to increase engagement in the Alton and Putney areas with Employment services. 17% of enquiries to Work Match were successfully matched with and started a job in 2016, compared to 36% for the Borough. Services report that this reflects a more complex local client group who require additional support to become work ready. There were only 8 enquiries, and no successful matches from the Putney Vale area.³³
- Supporting residents into employment may be particularly challenging where residents are not yet work ready or where caring responsibilities limit the work available to them. Work Match Roehampton deliver a programme specifically for this group called **New Routes to Work** which is proving successful.
- Over half (52%) of the Roehampton **Citizens Advice Bureau** workload relates to benefits and taxation advice. The second single biggest issue is Housing. Half of the clients supported have a disability or long-term health condition. The majority (two-thirds) of clients supported by the Roehampton Citizen's Advice Bureau, reside in the Putney constituency. Within the Putney wards, clients are most likely to live in Roehampton and Putney Heath (accounting for approximately 20% of all clients supported).³⁴
- Nearly half (47%) of all households on the Alton were claiming **Housing Benefit** as at March 2017, compared to 29% in Putney Vale; 30% of households were claiming **Council-Tax reductions**, compared to 15% in Putney Vale.³⁵



Age Well



There are around 900 older people living on the Alton and in Putney Vale, and many of them live alone. Nearly a quarter of the households where an older person lives alone are part of sheltered housing schemes. Whilst the housing stock has a low level of falls hazards, there are more emergency admissions to hospital for hip fractures than should be seen given the age-profile of the area, and also higher levels of dementia. It is likely that the poorer health seen in the adult population persists into older age, contributing to these poor outcomes amongst older people, as well as to shorter life expectancy. Much of the data that pertain to older people's health (e.g. stroke and heart disease), are also pertinent to adults, and as such are presented in the 'Live Well' chapter.

Population

- More than 900 people aged 65+ live in the Alton and Putney Vale Area. Around 9% of residents on the Alton are aged over 65, and 11% in Putney Vale, this compares to 9% for Wandsworth.³⁶

Health

- Men in the Alton and Putney Vale area spend up to 6.6 **fewer years in good health** than the Wandsworth average and women up to 4.9 fewer years.³⁷
- The overall prevalence of **dementia** amongst Alton GP patients is 0.77%, although this varies from 0.46% to 1.2% between the different GP practices. These levels are significantly higher than the Wandsworth average (0.36%), despite a similar proportion of the population being over 65. Dementia is closely linked to cardiovascular health which is poorer for patients in the Alton and Putney Vale area than for Wandsworth.
- Only 3% of homes in the area are thought to have **falls** hazards present, compared to 6% across Wandsworth.³⁸ However, despite this, there are around 34% more emergency admissions to hospital for hip fractures than would be expected based on national age-specific admission rates.³⁹



Social isolation / vulnerability

- 440 (12%) households have a person aged 65+ living alone in them. This is more than the Wandsworth (8%) and London averages (9.6%)⁴⁰, however this includes around 90 single occupancy dwellings that are part of two supported housing schemes on the estate (Minstead and Manresa); there are also three further sheltered housing schemes adjacent to the estate. Sheltered housing schemes can alleviate some of the risks of older people living alone, although falls can, and do, still occur. Both of the schemes have their own clubrooms which accommodate a range of activities and may go some way to addressing issues around social isolation. The clubrooms act as community resources, and the Supported Housing Officers report that many of the activities are predominantly attended by the wider community rather than sheltered housing residents.
- Local groups such as the 60+ café, provide a valuable resource to older people living on the Alton. One of the themes that has come out of community conversations, is the need for “accessible” community space, both in terms of physical access and rental cost that can be used by local groups.



Conclusion

The Alton is a diverse estate with many community resources and assets, however the distribution of these resources varies across the different parts of the estate. The situation of major roads and the boundary to Richmond Park also contribute to a perceived “isolation” of the community, and the Alton is more deprived than the surrounding areas, and Wandsworth as a whole. This context brings with it both challenges and opportunities for improving the health and wellbeing of individuals across their lives and also at the community and place level.

This health profile is predominantly based on routine and local data, with additional context drawn from community conversations. The key challenges identified focus on areas where there are opportunities to make a difference locally and are highlighted for further exploration with the community and local partners to identify areas for development and local intervention.

Key challenges include:

- addressing variable access to affordable healthy food to support healthy food choices;
- making the most of opportunities around changes to the urban and street environment which have the potential to positively influence people's lifestyles e.g. decisions around walking, cycling, use of public transport and shopping locally;
- increasing engagement with local services such as Community Safety and policing;
- making the most of local community resources (e.g. the university);
- continuing and accelerating the downward trend in childhood obesity;
- increasing healthy life expectancy;
- building capacity within local organisations;
- strengthening community connectedness and belonging, and tackling social isolation.

There are also a number of areas where we need to better understand some of the factors that sit behind the data. These include better understanding the needs of key groups such as lone parents, people with mental health difficulties and learning difficulties; and understanding the factors behind the variation in childhood vaccination coverage and the higher than expected levels of emergency admissions to hospital for hip fractures. As well as establishing a better understanding of vulnerabilities around crime, particularly with respect to young victims.

Measuring and evaluating change resulting from regeneration is challenging. Regeneration programmes are highly complex interventions which involve numerous physical and social elements that impact on the health and wellbeing of communities and that are not always amenable to quantification. An evaluation approach will need to be established based on the findings of this health profile and the data sources identified, and informed by the learning from other area-based initiatives across London and nationally.



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