

**PRIVATE & CONFIDENTIAL**

Mandip Sahota  
NTA Planning LLP  
46 James Street  
London  
W1U 1EZ

8<sup>th</sup> January 2026

Dear Mandip,

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

Further to recent correspondence and post receipt of the LB Wandsworth's (the Council) Proof of Evidence (dated December 2025), provided by Nik Smith of Nexus Planning on behalf of the Council, I write to address comments within the Council's Proof at section 8. This letter provides additional information and to Robert Bloss's Affordable Housing Policy Note issued 28th November 2025, included at Appendix 10 of Mandip Sahota's Proof of Evidence.

**Response to Council's Proof of Evidence - Section 8**

At paragraph 8.2 of the Council's proof, it is set out that in their view the scheme does not constitute affordable housing. We would disagree with this position. The Council reference the definitions of affordable housing as stated in the National Planning Policy Framework, Annex 2. The accommodation to be provided at the scheme is designated as Temporary Accommodation. We extract the definition of affordable housing below, where relevant to the nature of the accommodation proposed:

*"Housing for sale or rent, for those whose needs are not met by the market...and which complies with one or more of the following definitions:*

*b) Other affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the government's rent policy for Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider...; and (c) it includes provisions to remain at an affordable price for future eligible households."*

Temporary accommodation is housing for those who are homeless or at risk of being homeless. Such a group's housing needs are clearly not being met by the market. Temporary accommodation rents are set at Local Housing Allowance (LHA) levels. LHA rates, for shared accommodation in the scheme's local market context, are below 20% of the market rent as identified in the following table. The landlord of the accommodation would be a local authority or a registered provider of affordable housing as anticipated under any lease offer. The scheme, as restricted to Temporary Accommodation, would furthermore provide provision to remain at an affordable price for future eligible households.

Unit Type	LHA*	Market Rent**	LHA as % of MR
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Shared Accommodation Rate	£136.13 per week	£196.30***	69%
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\*Outer South West London Broad Rental Market Area

\*\*Comparable evidence at Appendix 1

\*\*\*Bills included and furnished

As the scheme is identified as 100% Temporary Accommodation, and as noted above falling within the definition of affordable housing, the Council's affordable housing policies would not apply.

At section 8.14, the Council give reference to our letter issued on 28<sup>th</sup> November 2025 to the scheme's planning agent. For clarity we note we have an appropriate level of experience to comment upon affordable housing matters. Red Loft is a company with over 60 staff who over the last 24 years have acted as project managers and delivered affordable housing projects, on behalf of Councils and Registered Providers of Affordable Housing (RPs). Rob Bloss, who drafted our previous letter, is Assistant Director of Red Loft's Land Team and a RICS registered surveyor, specialising in viability assessment and management of planning applications for schemes being delivered by RPs. I have worked within the affordable housing sector for 15 years and have a background in town planning and surveying.

At section 8.14, the Council challenges the position that "an affordable housing requirement is not required because the accommodation [proposed] may have a relatively low cost to the end user (i.e. occupiers)". We are confused by this statement as the definition of affordable housing, is in essence to provide low cost accommodation to the occupiers (in this case tenants). Affordable housing policy governs the rent that is paid by the occupant, and as set out, it is our view the accommodation proposed forms affordable housing, therefore additional affordable housing requirements would not be triggered.

At section 8.15, the Council infers that because the scheme is being developed by a commercial operator it does not qualify as affordable housing. Most, if not all, affordable housing schemes are developed by contractors and or by developers who are commercial enterprises, while the ultimate landlord to the tenants are a Local Authority or an RP. An RP can also be a private and commercial enterprise (as a Private Registered Provider of Affordable Housing). Whether the proposals are developed and indeed operated by a commercial enterprise does not detract from the designation of the accommodation as affordable housing. We would note that the price paid by an RP or Local Authority for a housing product is not a matter for planning.

Paragraphs 8.16 to 8.18 of the Council's proof go on to note that in their view the use class of the scheme would trigger affordable housing contributions. We refer back to the correspondence with the GLA as extracted below (from 21<sup>st</sup> November 2025, at Mandip Sahota's Proof of Evidence, Appendix 11) which states in their view the scheme would not trigger affordable housing requirements.

*"The sui generis accommodation you describe would not attract an affordable housing requirement. Assuming the accommodation would be secured as specialist accommodation in the planning permission (as opposed to co-living accommodation that could be occupied by anyone), and occupants would not be charged market rents (e.g. for a co-living type product), the accommodation would be viewed as a form of affordable housing in any case".*

In conclusion, I reiterate the closing paragraph from our previous letter, and note that this is a *Sui Generis* application, therefore applying affordable housing policies intended for HMO or LSPBSL is wrong. Moreover, it is clear that the occupant would not be paying market rent and in reality this scheme already proposes a form of affordable housing. To apply a form of further affordable housing contribution on this scheme would be wrong and rested on applying policies incorrectly.

I hope this letter further clarifies our views on these proposals. Should there be any further requirements we would be happy to discuss these.

Yours sincerely,

John Booker



Red Loft LLP  
Head of Land and Consultancy

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## Appendix 1

 [Saved properties](#)

# My Favourites

New

## Collaborate on your lists

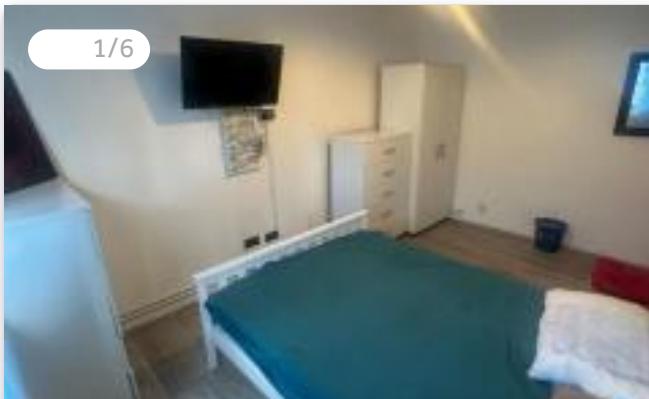
You can now invite friends and family to join your lists, speeding up your property search.

[Create a list](#)

Newest first

[Map view](#)

s

**£1,100 pcm** HomeWorld  
Management Ltd.

Petersfield Rise, London, SW15



House Share 1

Spacious & cosy double room for rent in SW15 4AY. Rent £1000 PCM, deposit £1000. Fully furnished, ideal for couples. Bills & Wi-Fi included. Peaceful area with garden, parking & nearby transport. Ready to move in. Contact us now to arrange a viewing.

Added on 02/12/2025



+ Add note

**£254 pw**

Portswood Place, London, SW15



Flat Share 1

Spacious single room for rent in SW15 4ED at £1099 PCM (deposit same). Fully furnished with off-street parking, Wi-Fi, and bills included. Close to amenities, shops, and transport. Peaceful area, ready to move in. Contact us today to schedule a viewing and secure this great space!

Added on 02/12/2025



+ Add note

**£196 pw**

Harbridge Avenue, London, SW15

House Share  1

Spacious, fully furnished single room for rent in SW15 4EZ. £850 PCM, £850 deposit. Bills included, WiFi, private parking, and back garden. Close to shops, transport, and amenities. Quiet residential area. Available for immediate viewing. Contact now to schedule a visit!

Reduced on 31/12/2025



+ Add note



£230 pw



Eastleigh Walk, London, SW15

House Share  1

Spacious & cosy double room for rent at SW15 4LQ. Rent: £995 PCM (Singles), £1000 PCM (Couples), Deposit: £995. Features include a fully furnished room, a backyard garden, on-street parking, Wi-Fi, bills included, and close to amenities. Available for immediate viewing. Contact us today!

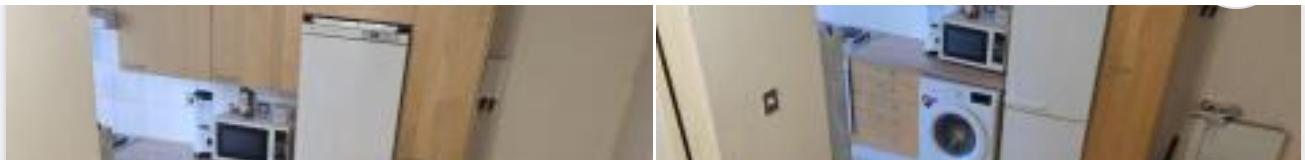
Reduced on 31/12/2025



+ Add note

1/5



**£999 pcm**

Eastleigh Walk, London, SW15



House Share 1

Spacious double room for rent in SW15 4LQ. £999 PCM, £999 deposit. Fully furnished, bills included, WiFi, on-street parking, and a back garden. Quiet area near shops, transport, and amenities. Immediate viewing and move-in available. Contact to schedule a viewing.

**Reduced on 31/12/2025****+ Add note****£800 pcm**

Clarence Lane, London, SW15



House Share 1

Spacious, fully furnished double room for rent in SW15 5QD. £800 PCM, deposit same. Bills & WiFi included. On-street parking, Close to shops, transport & amenities in a peaceful area. Available for immediate viewing. Contact now to book!

**Reduced on 03/12/2025**



+ Add note

**£231 pw**

Harbridge Avenue, London, SW15



House Share 1

Spacious, fully furnished double room in SW15 4EZ for £1000 PCM (bills included). Features a cosy reception, WiFi, garden, on-street parking, and great transport links. Located in a quiet residential area near shops. Deposit same as rent. Available now-book a viewing today!

Reduced on 31/12/2025



+ Add note

**£231 pw**

Highcliffe Drive, London, SW15



House Share 1

Fully furnished double room in SW15 4QD for £1000 PCM (bills included). Features cosy reception, WiFi, garden, on-street parking, and great transport links. Located in a peaceful area near shops. Deposit equals rent. Available now-book your viewing today!

**Reduced on 31/12/2025****+ Add note****£900 pcm**

Clarence Lane, London, SW15



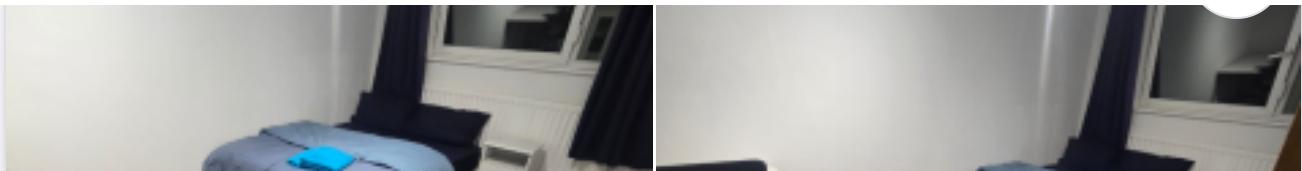
Flat 1

Friendly & Inviting: "Spacious double room in a lovely shared house - all bills and council tax included! Just move in and enjoy stress-free living."? Professional & Clean: "Bright double room in a well-maintained shared house - rent includes all bills, Wi-Fi, and council tax. Hassle-free living

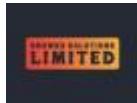
**Added on 20/11/2025****+ Add note**

1/4





£900 pcm



Clarence Lane, London, SW15



Flat 1

Friendly & Inviting: "Spacious double room in a lovely shared house - all bills and council tax included! Just move in and enjoy stress-free living."? Professional & Clean: "Bright double room in a well-maintained shared house - rent includes all bills, Wi-Fi, and council tax. Hassle-free living

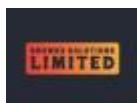
Added on 20/11/2025



+ Add note



£800 pcm



Clarence Lane, London, SW15



Flat Share 1

Friendly & Inviting: "Spacious double room in a lovely shared house - all bills and council tax included! Just move in and enjoy stress-free living."? Professional & Clean: "Bright double room in a well-maintained shared house - rent includes all bills, Wi-Fi, and council tax. Hassle-free living

Added on 20/11/2025



+ Add note

**£231 pw**

Egleton House, London, SW15



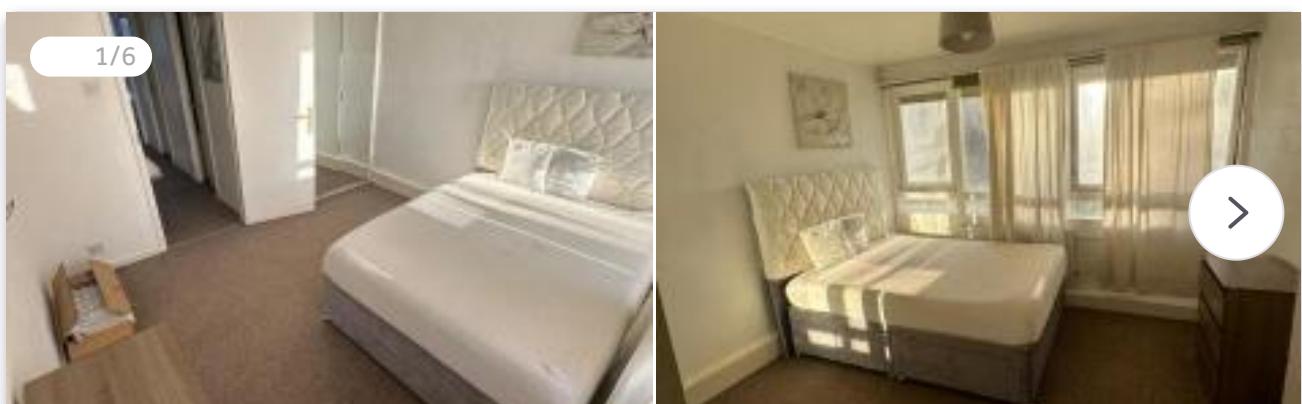
Flat Share 1

A spacious two-bedroom apartment with a south-facing balcony, set within a contemporary development in Putney. Double room available in 2 bed flat in Roehampton. Bedroom: 3.4meters x 3.6meters... \*\* Property Reference: 2660061 \*\*

Added on 30/10/2025



+ Add note

**£231 pw**

Highcliffe Drive, London, SW15

House Share  1

Spacious double room in SW15 4PY for £1000 PCM, deposit £1000. Fully furnished, bills & WiFi included. On-street parking, reception area. Ideal for couples. Peaceful location, close to shops & transport. Available for immediate viewing. Contact us today to secure this great room.

Added today



 Add note

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