



Appeal Ref: APP/H5960/W/25/3371729

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

Case Management Conference – Thursday 6 November 2025

INSPECTOR'S PRE-CONFERENCE NOTE

1. The case management conference (the Conference) will be led by myself, Jonathon Parsons, MSc BSc (Hons) DipTP Cert(Urb) MRTPI and Planning Inspector. Attached, as separate documents, are instructions for joining the conference, a conference etiquette which is to be observed, and the conference agenda.
2. The purpose of the event is to set out a clear indication as to the ongoing management of this case and the presentation of evidence, so that the forthcoming Inquiry is conducted in an efficient and effective manner. There will be no discussion as part of the Conference as to the merits of your respective cases and I will not hear any evidence.
3. The Inquiry itself is currently scheduled to sit for 5 days, from Tuesday 20 January to Friday 23 January and Monday 26 January 2026. Dependent upon discussions, Monday 26 January 2026 may be reserved for closings which could be held virtually.

Background

4. The appeal is made by AKA Capability LLP. The Council is the London Borough of Wandsworth. The appeal relates to the planning application Ref 2025/0074, dated 10 January 2025.
5. The appeal site comprises Mount Clare Campus, various buildings and amenity spaces and lies adjacent to Richmond Golf Club and Richmond Park. The buildings are Mount Clare House (Grade 1 listed), the Temple in the grounds of Mount Clare House (Grade II*), a single storey building known as The Lodge and The Bungalow, outbuildings adjacent to The Lodge, 1960s two storey Picasso House/Hall and fifteen 1960s Blocks A-E.
5. The development plan comprises the Wandsworth Local Plan 2023 and the London Plan 2021.
6. The Council is preparing a new Local Plan Partial Review. It has submitted amendments to the Secretary of State for independent examination. The amendments propose revisions to the following policies: LP23 Affordable Housing; LP24 Housing Mix; LP28 Purpose-built Student Accommodation; LP30 Build to Rent; LP31 Specialist Housing for Vulnerable People and Older People.

Procedural Matters

Development Description

7. The application description, as detailed by the Council, is the “Change of use of Picasso Albers, Andre, Appell, Balla, Bellini, Blake, Cornell, Catlin, Calder, Dali, Degas, Degas, Duffy, Eakins, Epstein and Etty Houses from mixed-use comprising office, student accommodation and storage to hostel temporary accommodation to accommodate 264 rooms with common facilities alongside the replacement of the former lodge building and the provision of ancillary refuse/cycle stores, landscaping, play space and associated works. ”
8. The appellant’s original application description read “use of existing buildings for temporary accommodation with associated landscaping.” Within the appellant’s SoC, the description is “use of existing buildings for hostel accommodation with associated landscaping and cycle parking”. In the appellant’s appeal form, the description is “use as hostel accommodation (Sui Generis) with associated landscaping and cycle parking”.
9. The Inspector is aware of the previous appeal¹ on the site relating to a certificate of use which is subject to a legal challenge. Recently amended /amplifying plans have been submitted relating to the Lodge (The Bungalow) building which the Council indicates as confirmation of rebuilding/replacement. They are also of the view that the building is so dilapidated that it is unlikely to be brought into operational use unless it is entirely rebuilt/replaced.
10. At the Conference, the Inspector will be asking main parties for clarification/confirmation of the development description. It is understood that the application/appeal has been advertised on the basis of the appellant’s description. If changes are required to the description and additional publicity is required, a 21 day period for public comments would be required. Discussion regarding re-consultation with relevant consultees, perhaps heritage consultees, may also be required.

Amended plans

11. Allied to discussions above, the Inspector will be seeking comments on whether the amended/amplifying plans should be accepted as part of the proposal.

Likely Main Issues

12. This is an appeal against non-determination. The Council’s Officer’s report and its Statement of Case lists 7 putative reasons for refusal (PRfR). Some of these putative reasons for refusal relate to technical objections which may be resolvable through a s106 agreement and/or conditions. On this basis, I have listed what I see as the fundamental issues below at this stage.

¹ APP/H5960/X/25/3358768 Certificate of Lawfulness for use as temporary housing (Use Class sui generis).

However, this list is by no means exhaustive until I hear from the appellant on these matters and is merely a starting point for discussion.

13. On this basis, the likely main issues are as follows:

1. Whether the proposal would preserve or enhance the character or appearance of the Alton Conservation Area, preserve a Grade II Alton West registered park and garden, Grade 1 listed Mount Clare house and Grade II listed Temple.
2. Whether the proposal would optimise the capacity of the site to maximise Housing delivery, having regard to range and type, including affordable housing (AH), need, accessibility to shops, leisure, services and facilities by sustainable transport, and heritage assets.
3. Whether the proposal would result in a high quality design, having regard to standard of residential accommodation.

14. In respect of issue 1, the Council's SoC details that on the information available, that the proposals would lead to less than substantial harm to the designated heritage assets, including potentially the character and appearance of the Conservation Area.

15. PRfR 4, 5 and 7 relate to technical issues, energy and carbon reductions /savings, affordable housing provision/contribution and sustainability and local infrastructure (travel plan monitoring, carbon offsetting, AH and administrative costs).

16. For energy and carbon reductions/savings (PRfR4), there is an energy report (Submitted October to PINS) which indicates constraints to savings/reductions. At the Conference, the Inspector will be seeking views on how this matter is being progressed, having regard to viability, if need be, and whether any shortfall can be resolved by condition and/or obligation.

17. For AH provision (PRfR5), it is understood that the appellant reserves their position on this matter having regard to the ongoing challenge of the appeal decision on the previous application and the Council's SoC (as detailed in the draft SoCG). At the Conference, the Inspector would wish to discuss this further.

18. For sustainability and local infrastructure, the appellant indicates no planning obligations are currently proposed but awaits feedback from the Council on what obligations may be sought (draft SoCG). At the conference, the Inspector would wish to discuss this further.

19. In light of Conference discussions, it is possible that the likely main issues will be added to. The Inquiry will also look at any benefits to be weighed in the heritage and planning balance (where necessary), including the implications for not proceeding with the scheme. It will also look at other material considerations, including if required, the disputed lawful use of the site.

Inquiry, main issues, conditions and planning obligation

20. The Inquiry will focus on areas where there is disagreement. With that in mind, the conference will explore how best to hear the evidence in order to ensure that the Inquiry is conducted as efficiently as possible.
21. Therefore, I would like to discuss at the Conference what witnesses the main parties wish to field and the general approach to the production of evidence. We will also need to discuss how the evidence is to be heard for each topic, i.e. round-table session or formal presentation of evidence.
22. As a starting point for discussion, it is suggested that heritage and planning matters (Issues 1 and 2) be examined through the formal presentation of evidence by a witness for each of the main parties, the Council and appellant. As to design (Issue 3), this is a technical matter that perhaps be best dealt with through a Round Table Discussion (RTD) by the Inspector. Such a RTD would look at the various detailed points made by the Council in its SoC and proof of evidence. Planning obligation and conditions could be examined through a RTD but I would expect agreement on these matters prior to the Inquiry. On conditions, I will expect an early draft for me to comment upon so that they can be finalised prior to the Inquiry.
23. Please can we discuss whether we field the witnesses on a topic-by-topic order, or if it will firstly be all of the Council's witnesses then the appellant's. We may also need to discuss where any round-table sessions would fit into the programme. Please can it be confirmed if there are any dates where certain witnesses will be unavailable, to help inform this discussion and my Inquiry Schedule. The evidence of the appellant will also need to address any other matters raised by interested parties.
24. As previously indicated, there are PRfR raising technical issues (PRfR 4,5 and 7). Depending on the outcome of Conference discussions, there may need to discuss how these issues are dealt with.
25. While the Inquiry is running, after the first day, I would normally resume on subsequent days at 09.30. In general, I will aim to finish each day at around 17.00 but it might be necessary in (limited) circumstances to finish slightly later, for example if a witness is very near the evidence of cross-examination. Please can the Council confirm that this can be accommodated at the proposed venue and if there are any cut-off times that need to be observed.

Core Document

26. A Core Document List (CDL) will need to be produced and then kept up-to-date as the appeal progresses, including at the Inquiry itself. This needs to be agreed in advance of the proofs of evidence so that the CDL can be properly referenced to in the proofs. We can discuss at the Conference how best to manage this.

27. An Inquiry Website will be required. I would like to discuss responsibility for this, and for the ongoing maintenance of it both up to and during the Inquiry, at the Conference.

Inquiry Venue

28. The Council will need to confirm details of the nearest venue and its facilities for the Inquiry. In particular, please can we discuss the capacity, microphones, wi-fi, retiring rooms, parking, food, and whether or not it will be secure for the purposes of leaving documents overnight. As a backup, for example if a witness falls ill, it may be necessary for a 'hybrid' approach to be adopted. This has been successfully incorporated at other previous inquiries through the use of a large screen at the venue.

Timetable for the submission of documents

29. We will discuss at the Conference the timetable for submissions in the lead-up to the Inquiry. Below is the provisional timetable and comments:
- I will issue a note of this Conference shortly, at the latest the end of the week, the 7 November;
 - Council's and Appellant SoCG, explaining clearly the Council's revised position, submission date to be agreed prior to a CDL and the submission of the proofs of evidence
 - A final CDL must be agreed ahead of the Proofs of Evidence so that the documents can be appropriately referenced;
 - The deadline for the Proofs of Evidence is 23 December 2025;
 - The Council must send a copy of the inquiry notification letter by no later than 2 weeks before the Inquiry, 6 January 2026. The Inspector would suggest a date before this date at the beginning of January.
 - The 6 January 2026 is also the deadline for all parties to provide time estimates for Evidence in Chief and cross-examination of witnesses, to inform my preliminary Inquiry Schedule, and
 - Round-table session agendas, a final draft s106 agreement/Unilateral Undertaking (if necessary), CIL Compliance Schedule report from the Council (if applicable) and a completed and agreed draft conditions schedule should all be provided by 9 January 2026. I intend to finalise the Inquiry Schedule by 12 January 2026.

Costs

30. A cost application has been received from the appellant and the Council has indicated the possibility of a cost application. If any further applications is to be made, Planning Practice Guidance makes it clear that this should be made in writing before the Inquiry. You are also reminded in this regard, that to support an effective and timely planning system in which all parties are required to behave reasonably, I have the ability to initiate an award of costs, although hopefully I won't have to use this power. Whilst not inviting them, if other parties wish to submit additional cost claims, these must be made before the close of the Inquiry.

Any other procedural matters

31. Dependent upon discussions, there may be need to consult Historic England because of the effect on Grade 1 and II star designated Heritage Assets.
32. I will conduct a site visit ahead of the Inquiry. I would like to discuss at the Conference how best I might undertake this visit, which would be unaccompanied. A walking plan, with a suggested route and identified viewpoints, might be useful.
33. The attached Annex sets out the preferred format and content of proofs and other material, which is to be observed by all parties to the Inquiry.
34. The Council are encouraged to draw the attention of interested parties to this Note, including posting a copy on its web site.

Jonathon Parsons
INSPECTOR

4 November 2025

Annex: Content and Format of Proofs and Appendices

Content

Proofs of evidence **should**:

- focus on the main issues identified, in particular on areas of disagreement;
- be proportionate to the number and complexity of issues and matters that the witness is addressing;
- be concise, precise, relevant and contain facts and expert opinion deriving from witnesses' own professional expertise and experience, and/or local knowledge;
- be prepared with a clear structure that identifies and addresses the main issues within the witness's field of knowledge and avoids repetition;
- focus on what is really necessary to make the case and avoid including unnecessary material, or duplicating material in other documents or another witness's evidence; and,
- where data is referred to, include that data, and outline any relevant assessment methodology and the assumptions used to support the arguments (unless this material has been previously agreed and is included as part of the statement of common ground).

Proofs **should not**:

- duplicate information already included in other Inquiry material, such as the officer's report, decision notice, site description, planning history and the relevant planning policy; and,
- recite the text of policies referred to elsewhere: the proofs need only identify the relevant policy numbers, with extracts being provided as core documents. Only policies which are needed to understand the argument

being put forward and are fundamental to an appraisal of the proposals' merits need be referred to.

Format of the proofs and appendices:

- proofs to be no longer than 3000 words if possible. Where proofs are longer than 1500 words, summaries are to be submitted;
- proofs are to be spiral bound or bound in such a way as to be easily opened and read;
- front covers to proofs and appendices are to be clearly titled, with the name of the witness and relevant qualifications on the cover;
- both pages and paragraphs are to be numbered;
- appendices are to be bound separately; and,
- appendices are to be indexed using **projecting tabs**, labelled and **paginated**.