

**WITNESS STATEMENT (FACTUAL)
OBSERVED USE OF MOUNT CLARE**

CHRISTOPHER AQUILINA MRICS

**MOUNT CLARE
MINSTEAD GARDENS
ROEHAMPTON
SW15 4EE**

23rd December 2025

1. Status of this statement

I make this statement to record facts within my own personal knowledge concerning my involvement with and observations of the property known as Mount Clare, Minstead Gardens, Roehampton, SW15 4EE (“the Property”).

This statement is provided to assist the Inspector by setting out a factual chronology of my personal observations of the use and occupation of the Property over time. It does not express any opinion on the planning status, lawfulness, or legal continuity of any use.

This statement is limited strictly to what I personally observed or became aware of during the course of my professional involvement with the Property between 2011 and 2025. During that period I attended the Property on a number of occasions for purposes including site inspections, meetings and lease related matters. I also communicated with the owner regarding the Property by email and telephone during this period.

I do not provide any opinion in this statement on:

- the lawful planning use of the Property;
- the planning status of any activities carried out at the Property; or
- any matters of planning law or policy.

In making this statement, I have referred where necessary to my notes, correspondence and other documents that I hold relating to the Property. I have not carried out any additional investigations for the purpose of preparing this statement.

I cannot comment on periods when I was not present. My observations are limited to the occasions on which I personally attended the Property and information provided to me in the course of my professional role.

2. Professional Background

I am a Chartered Surveyor and have been employed by Spring4 Limited since 2006. My role during the relevant period was a real estate consultant providing strategic advice to the owner of the Property.

3. Introduction

I first became involved with the Property in 2011. I was at that time advising the Southlands Methodist Trust (“SMT”). The freehold owners of the property were the Trustees for Methodist Church Purposes (“TMCP”) who held the property as Custodian Trustees for the Managing Trustees. SMT were the Managing Trustees for the Property.

My involvement with the Property as advisor to SMT continued until 2024 and culminated in the sale of the estate in December 2023 when a contract for sale of the Property was entered into with Specialist Real Estate Limited. The sale of the Property completed on 21st June 2024 when

the Property was ultimately acquired by AKA Capability LLP. I was then appointed as an advisor to AKA Capability LLP. As such I have had involvement with the Property for approximately fourteen years.

My involvement with the Property also necessitated extensive research into the history of the Property beyond the 2001 acquisition of the Property by my original client, SMT.

Any description of the use of the site is a factual statement of observed use only and does not constitute a planning or legal opinion.

4. Legal Title and Occupational Leases

The Mount Clare site is registered under title numbers TGL160764 and TGL47292. TGL160764 pertains to Mount Clare House and the Temple whilst TGL47292 covers the rest of the site.

At the time of my initial involvement with the Property, the entire site was subject to two Leases granted to the University of Roehampton for a term until 31st July 2026. One Lease was effectively of Picasso House and the other (referred to as the Main Lease) was of the remainder of the site. The detailed position for each of the two Leases is set out below.

Main Lease

The First Lease of Mount Clare House, the Temple and surrounding land and buildings at Minstead Gardens was drawn between the Trustees for Methodist Church Purposes and the Trustees of the University of Surrey. The First Lease is dated 12th February 2002 and is for a term from 21st September 2001 to 20th September 2011.

Under a Surrender and Lease document dated 30th July 2008 the Lease term was altered so that the University of Roehampton subsequently held the Property for a term of twenty years from 1st August 2006. That Lease was due to expire as at 31st July 2026 but was surrendered in 2025.

Picasso House Lease

The First Lease of the dining block (Picasso House) was drawn between the Trustees for Methodist Church Purposes and the Trustees of the University of Surrey. The First Lease is dated 17th June 2003 and is for a term from 29th September 2002 to 20th September 2011.

Under a Surrender and Lease document dated 30th July 2008 the Lease term was altered so that the University of Roehampton subsequently held the Property for a term of twenty years from 1st August 2006. That Lease was due to expire as at 31st July 2026 but was surrendered in 2025.

5. Historical Context and Statement of Use

Prior to my involvement with the Property, I understand that the site was owned by the University of Greenwich. Historic records suggest that the last date of occupation of the Mount Clare residences by the University of Greenwich was August 1998.

Based on documents that I have seen, the University of Greenwich subsequently sold the asset to Battersea Churches and Chelsea Housing Trust in March 1999. Battersea Churches and Chelsea Housing Trust had ambitions to redevelop the site that never came to fruition.

In June 2001, the Property was acquired by TMCP. Based on correspondence that I have seen, the University of Roehampton (“the University”) had an operational requirement for the Property but was unable to fund the acquisition. The acquisition of the Property by TMCP was an act of cooperation by Southlands College to support the wider University. Southlands College acted as a facilitator to acquire property that would provide the University with additional accommodation that it needed. Following the completion of the purchase of the Property by TMCP, the University entered into occupational leases of the Property as described above.

As well as purchasing the Property, Southlands spent approximately £2.15m renovating the buildings on the Property in readiness for occupation by the University. Upon completion of the works the Property comprised:

Student Accommodation: Five detached blocks providing a total of 165 student bedrooms.

Picasso House: A self-contained block of ancillary facilities (communal lounge / television facilities, laundry, workshops and storage) serving the student accommodation with a further 8 flats at 1st floor level providing a total of 28 bedrooms.

Mount Clare House: A Grade I Listed former private residence built in 1772 in use as offices.

Temple: Grade II* Listed Temple built circa 1762 - 1769.

Lodge: Residential house and associated garages.

Based on records and documents that I have seen that predate my involvement with the Property, it appears that the University made extensive use of the property as student accommodation with various ancillary uses from the point that the Leases were granted.

When I first inspected the Property in 2011, I observed that:

- The student accommodation blocks were occupied by University of Roehampton students.
- Picasso House was in use as ancillary accommodation at ground and lower ground floor level. The 1st floor flats were in use as residential accommodation by University of Roehampton students and staff.

- Mount Clare House was in use as office accommodation by the University property and estates team as well as for storage.
- The Temple was not in use and had fallen into a state of disrepair.
- The lodge and garages were not in use and had fallen into a state of disrepair.

From 2011 until 2022, I visited the Property intermittently. Throughout that period, the use of the Property that I observed appeared to be consistent with that described above. The student accommodation appeared to be more lightly used on some visits than others.

Based on my observations, the University had exclusive possession of the Property with the exception of the part ground floor of Picasso House. In 2019, the University granted an Underlease of the part ground floor of Picasso House dated 18th September 2019 to Wandsworth Citizens Advice Bureaux Limited. The Underlease was for a term from 18th September 2019 until 28th July 2026. The Permitted Use was as offices within Use Class B1 of the Town and Country Planning (Use Classes) Order 1987. The area demised to Citizens Advice Bureaux Limited extended to 970 sq ft.

So far as I am aware, there were no breaks in the University's occupation of the Property in the period 2011 until 2022.

In 2023, I inspected the Property frequently as the Property was prepared for sale and then marketed for sale. By 2023, the offices in Mount Clare House were vacated by the University. The student accommodation blocks were no longer used and were subsequently boarded up but most rooms remained furnished with a bed and desk. The ground floor of Picasso House was largely used for storage. The flats on the 1st floor of Picasso House were still in use. The Temple, lodge and garages were not in use.

6. Sale Process

In 2023, Spring4 and Strutt & Parker / BNP Paribas Real Estate jointly marketed the Property for sale. The marketing process commenced informally in August 2023 by email invitation to a select group of parties.

The site was subsequently formally launched in the public domain via LinkedIn and an advertisement in the Estates Gazette. The Estates Gazette advertisement appeared on 2nd September 2023 and repeated on 6th September 2023. The Property was widely and openly marketed. A total of 87 parties entered the data room throughout the marketing process. A total of 17 parties responded with Expressions of Interest. A total of 23 inspections were conducted within the window allocated for viewings. A total of ten bids were received with five bidders selected for interview.

Following the completion of the marketing phase, Spring4 and Strutt & Parker / BNP Paribas Real Estate made a joint recommendation to SMT. Heads of Terms were agreed and subsequently Specialist Real Estate Limited entered into a contract to purchase the Property in December 2023 with completion on 21st June 2024 when the Property was ultimately acquired by AKA Capability LLP. The legal entity completing the purchase changed in the period between the agreement for sale and completion but the ultimate purchasing party (AKA Capability LLP) involved the same people as the original prospective purchaser (Specialist Real Estate Limited).

Throughout my involvement with both AKA Capability LLP and Specialist Real Estate Limited, both before and after the sale of the Property, it was never their intention to undertake a substantial redevelopment of the Property. Following completion of the sale, I was appointed as advisor to AKA Capability LLP. AKA Capability LLP's strategy for the Property has consistently been to retain the existing buildings on the Property subject to undertaking such works as are necessary to provide emergency housing accommodation.

7. Statement of Truth

I confirm that the facts stated in this statement are true to the best of my knowledge and belief. This statement is confined to matters of fact within my personal knowledge, recollection, and contemporaneous records. It does not contain, and is not intended to provide, any expert opinion, interpretation of planning law or policy, or professional judgment. I understand that this statement may be relied upon in connection with planning or related proceedings, and I am willing to give oral evidence in respect of the factual matters set out above if requested.

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APPENDICES

2003.06.17 Lease - Dining Block

2002.02.12 Lease - Mount Clare House

2008.07.30 Surrender and Lease - Mount Clare House - Signed by Roehampton University

2008.07.30 Surrender and Lease - Dining Block - Signed by Roehampton University

2019.09.18 Underlease - CAB - Picasso House - Signed by Roehampton University

Title Plan View - TGL47292 - Mount Clare

Title Plan View - TGL160764 - Mount Clare House and Temple