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#### WANDSWORTH COUNCIL

The Town Hall, Wandsworth High Street, London, SW18 2PU

> 10<sup>th</sup> January 2025 NTA ref: 1286

Dear Sir/Madam,

### RE: MOUNT CLARE CAMPUS, MINSTEAD GARDENS, ROEHAMPTON GATE, SW15 4EE

USE OF EXISTING BUILDING FOR TEMPORARY ACCOMMODATION PORTAL REF: PP- 13614565

We are pleased to advise that we have submitted the above referenced application via the Planning Portal in regard to Mount Clare Campus, Minstead Gardens, Roehampton Gate, SW15 4EE (the **Site**). The application is submitted on behalf of the owners of the site, AKA Capability LLP.

The 1.57ha Site, is located adjacent to Richmond Park (Grade I Registered Park and Garden/Metropolitan Open Land) and the Borough's boundary with the Royal Borough of Richmond, to the south and west. The Site falls within the Alton Conservation Area.

The Site comprises **Mount Clare House**, which is the centre piece of the Site. The property is a Grade I listed 'Palladian' building and was last in use as offices/administration, by Roehampton University. While the site already benefits from Listed Building Consent for minor enabling works associated with the change of use (ref. 2024/0199), this Full Planning Application, which is the subject of this Planning Statement, does not propose any works to Mount Clare House.

To the east is **Picasso Hall/House**, a two storey 1960s block. The building is understood to have provided ancillary facilities serving adjacent living accommodation. The building also accommodated eight cluster flats at first floor level, comprising 32 rooms, plus further accommodation at ground and lower ground levels.

To the south lies **Residential Accommodation**, comprising five clusters of post-war, two-storey blocks, . Each cluster comprises 3 buildings, with 15 blocks in total (180 rooms). The buildings are named Albers, Andre, Appell, Balla, Bellini, Blake, Calder, Catlin, Cornell, Eakins, Epstein, Etty, Dali, Degas, and Dufy. The Accommodation comprises 180 bedrooms.

Beyond these structures and towards the southern tip of the Site lies **Mount Clare Temple** (Grade II\* listed), a dilapidated **Bungalow** and other **Dilapidated Outbuildings**.

In September 2024, the Site was subject to a planning refusal by LB Wandsworth (ref. 2024/0183) for temporary change of use for a period of five years from student accommodation and associated use to temporary housing. The two cited reasons for refusal are summarised as follows:

- Provision of insufficient evidence to justify the proposed loss of existing accommodation.
  - The proposed development would result in an overconcentration of HMOs and other single person accommodation at a local level, which would not have access to good levels of public transport (PTAL 4 or higher), and it has not been demonstrated that there would be satisfactory access to shops and services appropriate to the needs of the intended occupiers. It was also considered that an identified need had not been demonstrated for the proposed accommodation, and that due to the size and layout of the proposed units, development would not provide a good quality of accommodation in accordance with relevant best practice standards. Provision of insufficient evidence to demonstrate the transport impacts of the development and that car-free development is appropriate in this location.

With regard to the lawful land use at the Site, following the above decision, we understand from research (set out further in the Planning and Heritage Statement) that the development of buildings at the Site was carried out on land that had been originally acquired by the LCC for the development of the housing estate now known as the Alton Estate. In 1957 proposals were put forward for the use of the Property as hostel accommodation connected with a new training facility for Garnett College as part of a scheme for its relocation to new premises at the nearby Downshire House.

It is clear there were no use restrictions were imposed on this property and its use is that of a broad hostel. The use of the Site for Temporary Accommodation would therefore not require prior planning permission.

Notwithstanding the above position, for which confirmation is currently being sought by way of a certificate of lawfulness (subject to a separate appeal process following refusal of ref. 2024/2089), the Applicants seek to proceed as soon as possible with plans to get the building's back into meaningful full-time use, to provide security and to ensure that the buildings, particularly the listed buildings, do not fall into further disrepair. Accordingly, on a without prejudice basis, the enclosed application seeks planning permission for the use of the existing building for temporary accommodation, together with associated landscaping.

We enclose as part of the application, the following:

- Application Form
- CIL Form
- Planning and Heritage Statement

- Ecological Report
- Transport Statement
- Design and Access Statement
- Drawings (Existing and Proposed Set)
- Tree Report
- Air Quality Assessment
- Noise Assessment
- Landscape Plan

Please note that the submitted Planning Statement covers the following additional items where full technical analysis is not deemed as required given that works are limited to change of use and in the absence of physical development for which planning permission would be required:

#### Fire safety statement.

The proposed use seeks to repurpose the existing accommodation for use as temporary accommodation. The existing buildings are already served with appropriate signage, emergency exits and alarm systems. The Site is served with a principal access/car park to the north of Mount Clare House, which provides access to the principal listed building, Picasso House and the northern accommodation blocks. The Site benefits from a secondary frontage along Minstead Gardens which runs the length of the Site. The locations of a fire appliance park location(s) and refuge points have been identified.

#### Biodiversity net gain

This submission is accompanied by an Ecological Report, prepared by AA Environmental Limited (AAe). The Report concludes that Site is of overall low ecological value, with the species recorded described as common or abundant and are found in similar places across much of Britain, with no evidence of protected species recorded. Furthermore, the Report confirms that there are considered to be no over-riding ecological constraints to the proposals that would preclude planning permission being granted at this stage, subject to appropriately worded conditions.

Through the absence of physical development works, the proposals avoid any effect on Biodiversity (de minimis) and are therefore exempt from requiring to shown net gain. The verdant and well landscaped grounds are retained and will continue to be maintained.

### Whole life cycle assessment/ Sustainability and energy assessment

The proposals seek to retain the existing buildings with internal reconfiguration proposed. The limited works and retention and re-use of the existing building, and embodied carbon, will minimise carbon impact. The retention of all of the existing structures and taking a fabric first approach is encouraged by all tiers of policy to minimise the effects on embodied carbon. The quality of the existing structures will be further invested, improving the overall sustainability and efficiency of the buildings. Accordingly, a WLC, or energy/sustainability statement is not required.

# Community facilities assessment

The Planning and Heritage Statement identified that the Site is well served by a number of local and accessible facilities including the Roehampton Library; the Roehampton Base and Roehampton Youth Club; the Roehampton Boys Supporters Club; 166-168 Roehampton Lane (Nursery and Children's Centre); Alton Medical Practice; Danebury Avenue Surgery;

commercial properties in Danebury Avenue and Portswood Place; and the Alton Activity Centre. It also includes Downshire Field open space.

#### Contaminated land assessment

The Planning and Heritage Statement includes a historical overview of the Site, and a fuller Heritage Statement at Appendix 3, prepared by Bridge Associates. The overview confirms that the Site and its hinterland totalling 35 acres were acquired in 1770 by George Clive. The land comprised Putney Park land. Mount Clare House was built on the land in 1772-1773. The grounds were laid out by Capability Brown in 1774-1775. Various works of refurbishment and extension were carried out between 1780-1908. The land was then acquired by London City Council in 1945. The site, along with its hinterland were acquired through CPO, under the terms that that the 18<sup>th</sup> century houses in the area, included Mount Clare, were preserved, but the gardens developed. The house was restored in 1954, with the removal of latter wings, and returning the house to its original state as a neo-classical villa. Between 1963-1986 the building was occupied by Garnett College and converted to hostel accommodation. The landscaped grounds were altered to accommodate the new site arrangement. Finally, from 1986, the site has been occupied by the University of Greenwich, the University of Surrey, and most recently, the University of Roehampton for student housing.

Accordingly, the Site is not suspected to be contaminated. With regard to the existing buildings on site (accommodation and Picasso House), these have been assessed for asbestos. Please see enclosed reports by Tetra. There are some minor instances of potential asbestos within the building which would need to be managed and rectified prior to occupation.

Statement of community involvement See Planning and Heritage Statement.

## Urban greening

The proposals do not seek any new development. There are no works of demolition, replacement, or extension. Whilst there would be some internal reconfiguration to the buildings, the proposals simply seek use of the existing buildings for temporary accommodation. Landscape plans are submitted herewith.

# Waste management plan

The proposed temporary accommodation will provide a managed service, with on an-site management team, who will collect refuse from the various units and store them communally within the basement of Picasso House, until the relevant collection day.

The basement level accommodates ample space for the storage of eurobins, to cater for the temporary accommodation proposed. Picasso House provides level access to the car park to the north, where off-street collection can be undertaken from the private road serving Mount Clare House and the adjacent buildings.

The final details in relation to Waste Management are to be detailed by the end operators.

We trust that the above and enclosed is sufficient for officers to validate and assess the application. Should you have any questions or require further information, please contact us.

Yours Sincerely,
NTA PLANNING LLP