

**MOUNT CLARE CAMPUS, MINSTEAD GARDENS,
LONDON SW15 4EE
LONDON BOROUGH OF WANDSWORTH**

USE OF EXISTING BUILDINGS FOR TEMPORARY ACCOMMODATION
PLANNING AND HERITAGE STATEMENT

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1.0 INTRODUCTION

- 1.1 This statement has been prepared by NTA Planning LLP, on behalf of AKA Capability LLP, the owners of Mount Clare Campus and its associated buildings, in Roehampton, London SW15 4EE (the **Site**).
- 1.2 The Site falls within the London Borough of Wandsworth (the **Council**).



SITE PHOTOGRAPH

- 1.3 The 1.59ha 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.
- 1.4 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.
- 1.5 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.
- 1.6 To the south lies **Residential Accommodation**, comprising five clusters of post-war, two-storey blocks, each accommodating 12 rooms. 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 student bedrooms.

- 1.7 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**.
- 1.8 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.
- 1.9 With regard to the lawful land use at the Site, following the above decision, we understand from research (set out further in this report) 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.
- 1.10 The Applicant's position is that the Site has a broad permitted hostel use which means that the present change of use application is not legally necessary.. The use of the Site for Temporary Accommodation would therefore not require prior planning permission.
- 1.11 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 Applicant seeks to proceed as soon as possible with its plans to get the buildings 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.
- 1.12 The structure of this Statement is as follows:

Structure of this Statement

- Section 2 provides a description of the Site.
- Section 3 provides an overview of the relevant planning history of the Site.
- Section 4 provides a description of the proposed development.
- Section 5 provides the planning policy framework against which this application will be assessed.
- Section 6 examines the main planning considerations; and,
- Section 7 set out our conclusions.

2.0 DESCRIPTION OF THE SITE AND SURROUNDING AREA

- 2.1 The 1.59ha Site, is situated just inside the western boundary of the London Borough of Wandsworth and adjoins Richmond Park (a Grade I Registered Park and Garden/Metropolitan Open Land).
- 2.2 To the north and north-west of the Site are a number of eleven/twelve-storey tower blocks centred around Tunworth Crescent. These tower blocks are understood to be Grade II listed.
- 2.3 Rows of single storey bungalows (also Grade II listed) are situated to the north and east of the Site, fronting on to Minstead Gardens.
- 2.4 The application Site comprises of the following:

- **Mount Clare House**, a Grade I listed building to the north of the Site. The building is currently vacant but is understood to have last been in use for administration purposes.



MOUNT CLARE HOUSE

- **Picasso Hall/House** is a two storey 1960s block, which sits to the immediate east of Mount Clare House. The ground floor provided ancillary facilities serving the adjacent accommodation. It is understood that when last in use there were a further eight flats at first floor level providing 32 rooms, together with further accommodation over ground and lower ground levels.



PICASSO HOUSE

- **Residential Accommodation** comprises five clusters of three, two-storey blocks providing a total 15 building and accommodating 180 bedrooms. The accommodation is currently vacant. Each of the 15 blocks are individually named - Albers, Andre, Appell, Balla, Bellini, Blake, Calder, Catlin, Cornell, Eakins, Epstein, Etty, Dali, Degas, and Dufy.



STUDENT ACCOMMODATION

- **Mount Clare Temple** (Grade II* listed), **Bungalow**, and other **Dilapidated Outbuildings** are all vacant and in poor repair with overgrown surroundings.
- 2.5 The entire Site falls within the Alton Conservation Area.
- 2.6 The buildings are set within a large, landscaped plot which accommodates a rich variety of trees, many of which are protected by Tree Preservation Orders.
- 2.7 Access to the Site is taken via Minstead Gardens, to the north of Mount Clare House, which also accommodates a small area of private parking serving the Site. The buildings are then connected through a series of footpaths across the landscaped gardens.
- 2.8 The Site benefits from a PTAL of 2 and lies just a short walk from the local retail parade of Danebury Avenue, at the junction with Roehampton Lane. Despite the Site's relatively low PTAL, it benefits from access to local bus services into central London, and also benefits from close walking access to numerous local services. See submitted Transport Statement prepared by Mode, which provides further information in regard to the Site, its location and access to transport and amenities.

3.0 PLANNING HISTORY

LAWFUL LAND USE OF THE SITE

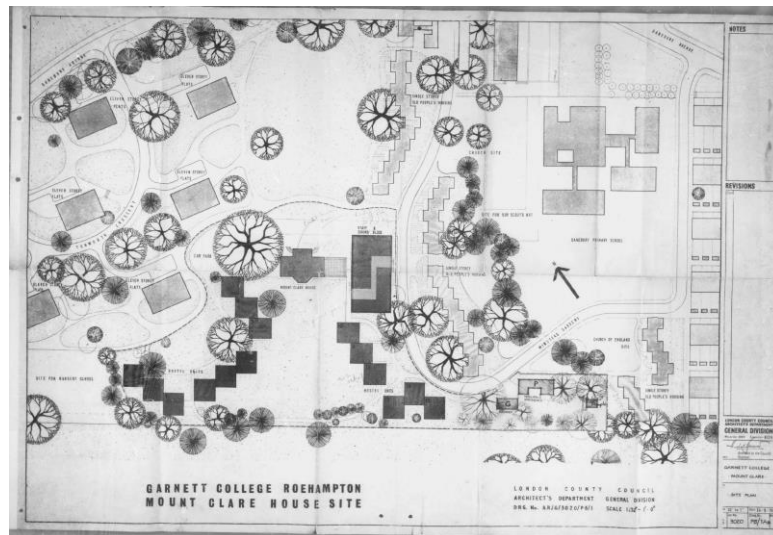
- 3.1 We understand that the development of buildings at the Site was carried out on land that had been originally acquired by the LCC for the development of the housing estate now known as the Alton Estate. A summary chronology of the records relating to the development of the buildings is included at Appendix 4.
- 3.2 The Alton Estate development was planned in the early 1950s but at that time there was no proposed use for the Mount Clare. . The Alton Estate development was planned in the early 1950s but at that time there was no proposed use for the Property. Mount Clare was acquired as part of the compulsory purchase order for the Roehampton Lane No.2 Housing Site made in 1948.
- 3.3 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.
- 3.4 Garnett College was a higher education college in London that trained lecturers in further and higher postgraduate education courses. It was originally set up in 1946 as part of North Western Polytechnic.
- 3.5 The archival records show that the development was designed and carried out by the LCC, and funding was provided by the Ministry of Education. We understand that the Ministry of Education was involved because Garnett College was main centre in the UK for training lecturers working in further education and in teacher-training colleges. The buildings were completed in 1962, with Garnett College moving to the Roehampton site in 1963.
- 3.6 Wandsworth's observations were sought on the LCC's proposed development of Mount Clare.¹ The report for the Wandsworth Town Planning Committee on 8 July 1960 describes the development as follows:
- "A two-storey staff and dining block is to be erected on the eastern side of Mount Clare House and fifteen two-storey hostel buildings are planned in the rear grounds to the eastern and western sides; Mount Clare House is to be converted to provide student's common rooms."*²
- 3.7 The recommendation put to the committee was:
- "That no objection be offered provided that an existing 2ft. safety strip along the eastern boundary of Mount Clare House is widened to provide a 6ft. footpath, and*

¹ Pursuant to the Town and Country Planning General Development Order 1950

² Town Planning Committee report in Wandsworth's planning archive (ref. WA-1298-B-TP)

*any new footway crossings are constructed to the satisfaction of the Borough Council”.*³

- 3.8 It is clear that the committee agreed this recommendation as the LCC architect then reported that Wandsworth had only minor concerns about access and that the scheme would be amended accordingly.
- 3.9 The site plan approved by the committee (as held by its planning archive), showing the “hostel units” and “staff and dining block”, extract below.



PLANNING HISTORY

- 3.10 The Site has been subject to several planning applications over recent years. We provide a summary of the pertinent cases below.

Ref. 2024/0183 & 2024/0199

- 3.11 On 26th September, a Full Planning Application for the temporary use of the existing buildings for a period of five years for temporary accommodation (Sui Generis) had been refused by LB Wandsworth. The description of development sought was as follows:

“Temporary change of use for a period of five years from student accommodation and associated use (Use Class sui generis) to temporary housing (Use Class sui generis).”

- 3.12 The application was refused for the following two reasons:

1. *Insufficient evidence has been provided to justify the proposed loss of student accommodation and that the proposed development would meet other Local Plan housing requirements. The*

³ Recommendation by the “B.E.” which we understand to be the Borough Engineer

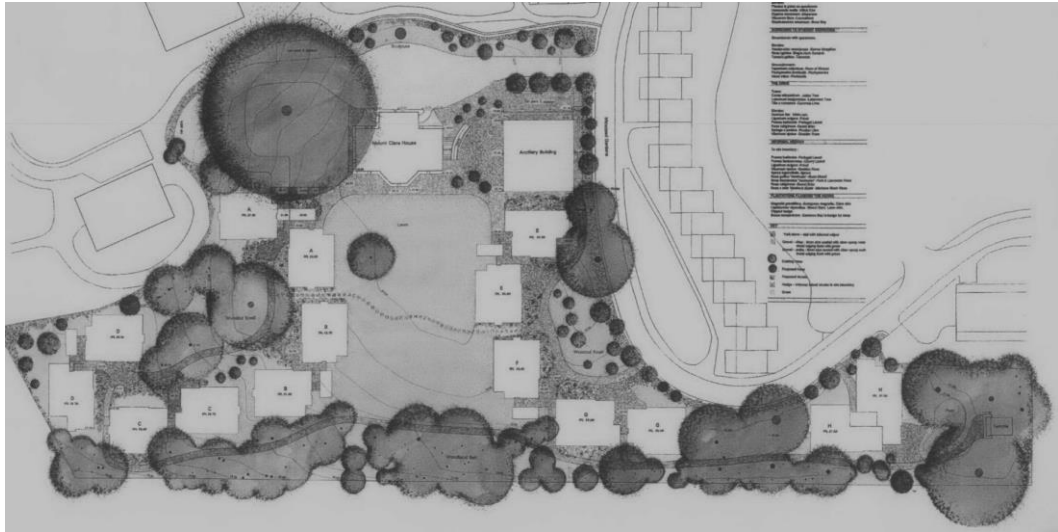
development therefore fails to meet the requirements of Local Plan policy LP28, which requires proposals that result in the loss of student accommodation to demonstrate that the site no longer caters for current or future needs for student accommodation and that the proposed development would meet other Local Plan housing requirements.

2. *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 has also not been demonstrated that the proposed accommodation would meet an identified need and due to the size and layout of the proposed units, the development would not provide a good quality of accommodation in accordance with relevant best practice standards and Wandsworth's Minimum Amenities Standards for Houses in Multiple Occupation (2020) and, in addition, it has not been demonstrated that the proposed development will meet the specific needs of residents with disabilities. Insufficient evidence has also been provided to demonstrate the transport impacts of the development and that car-free development is appropriate in this location. The proposal therefore fails to meet the requirements as set out in Local Plan policies LP29, LP31 and LP51 and London Plan policies D7, H12 and H16.*
- 3.13 Whilst Officers recognised that there is a need for accommodation to be provided all across London to prevent and reduce homelessness, the Delegated Report stated that it is not considered that the proposed quantum, standard and type of accommodation is acceptable in this location. The report considered that an increase in more than 200no. bedrooms would result in a significant oversupply within a small area.
- 3.14 The Delegated Report considered that the proposed accommodation would not meet relevant amenity requirements and would not have access to a good level of public transport. It was also considered that insufficient information had been provided with regards to multiple aspects of the development, including transport, amenity impact, waste storage and collection, and fire safety.
- 3.15 Concurrently, an application for Listed Building Consent (ref. 2024/0199) had been sought for minor enabling works at the Site. Although concern had been raised regarding the long-term future of Mount Clare and the Temple, it was not considered that the proposed development in itself would cause any harm to the listed buildings or registered park and garden. It was therefore recommended that Listed Building Consent be granted.
- 3.16 Listed Building Consent (ref. 2024/0199) was granted by LB Wandsworth on 26th September 2024.

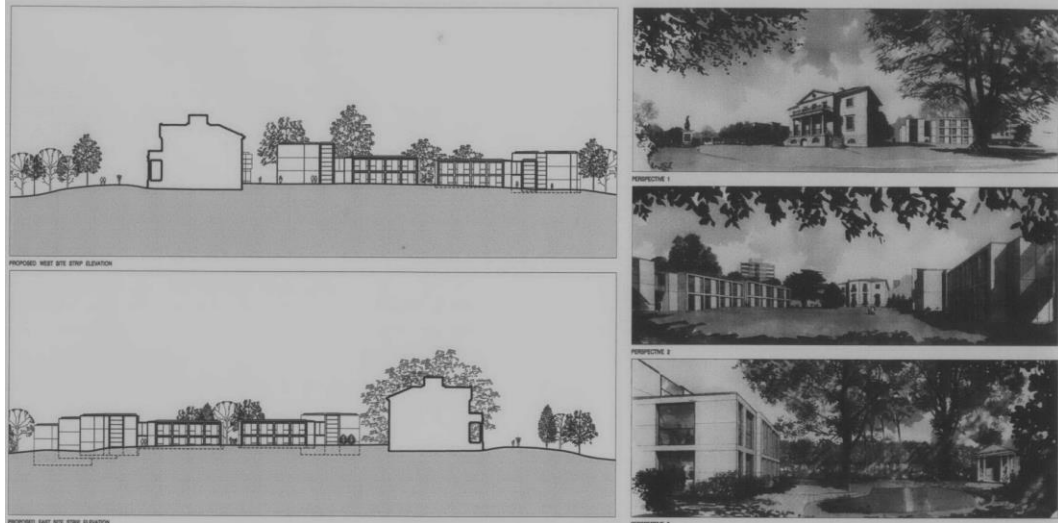
Ref. 2001/4576

- 3.17 Historically, application ref. 2001/4576 sought consent for '*Demolition of existing student accommodation blocks, lodge and dining block and the erection of 15 two, three and four-storey student residential blocks comprising 282 student bedrooms, and the erection of a two-storey academic administrative/social block adjacent to Mount Clare, with provision of associated landscaping and parking.*'
- 3.18 The above application was granted in April 2002; however, we are advised that the application was never implemented and therefore has since expired. We provide some

relevant extracts below which illustrate the approved scheme. The development increased the density of accommodation at the Site, both in terms of its physical capacity on Site, and the number of rooms provided.



APPROVED SITE PLAN



APPROVED SECTIONS/CGI EXTRACTS

4.0 THE PROPOSED DEVELOPMENT

4.1 The proposed development seeks use of the existing buildings for temporary accommodation, with associated landscaping. The proposals comprise the change of use and internal renovations to the following existing buildings:

- Picasso House
- Albers, Andre, and Appell Houses (A Block)
- Balla, Bellini, and Blake Houses (B Block)
- Cornell, Catlin, and Calder Houses (C Block)
- Dali, Degas, and Dufy Houses (D Block)
- Eakins, Epstein, and Etty Houses (E Block)
- Bungalow

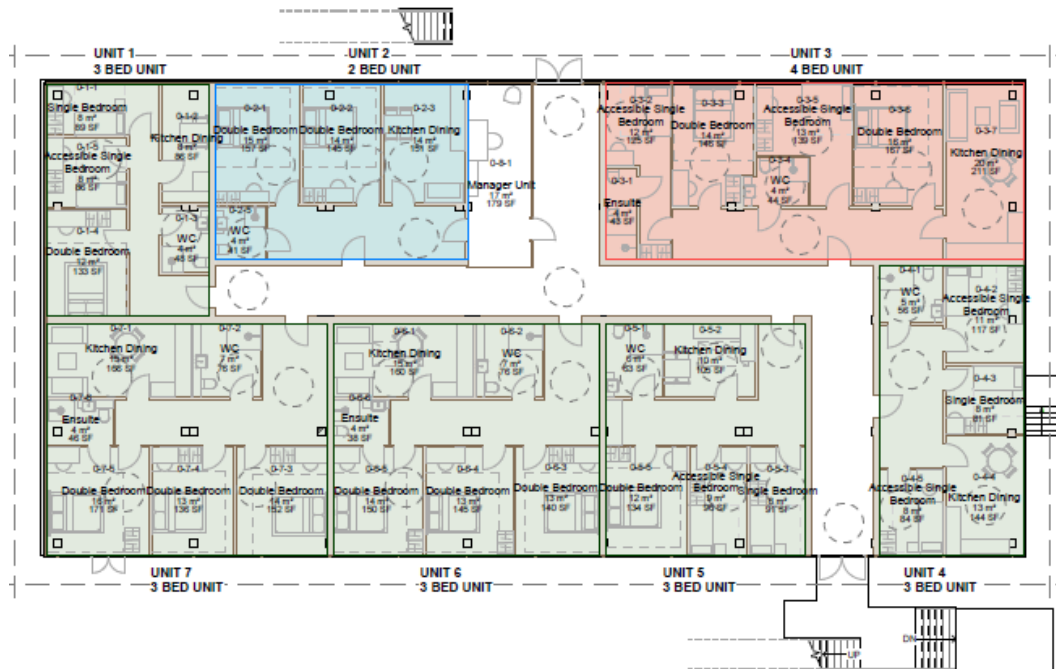
4.2 The proposals aim to improve the quality of the existing buildings, which have fallen into a state of disrepair. The scheme will provide temporary accommodation, which is much needed.

4.3 In respect of landscaping, the proposals seek to retain the verdant grounds which have generally been well maintained and comprise a variety of tree species. Accordingly, the landscape works include for external Sheffield stands outside of entrances to the existing buildings, as well as natural play space in the form of boulders, stilts, balance beams, and climbing pyramid for the benefit of future residents. The proposed landscaping element is not extensive and includes some amenity grassland and a compacted gravel path.

PICASSO HOUSE

4.4 Picasso House is a 2-storey building originally built in the 1960s. At the first floor level, it currently accommodates 8 self-contained apartments which comprise a range of sizes from 2 bedrooms, up to 8 bedrooms, each apartment self-contained and served with requisite bathroom and kitchen facilities. There are approx. 32 rooms at this level. The ground floor level comprised a Citizens Advice Bureau but is now vacant.

4.5 The proposed development seeks to convert the ground floor into wheelchair accessible accommodation and upgrading the existing accommodation on the first floor level. The proposals will deliver a total of 16no. 2–6 bed temporary accommodation units.

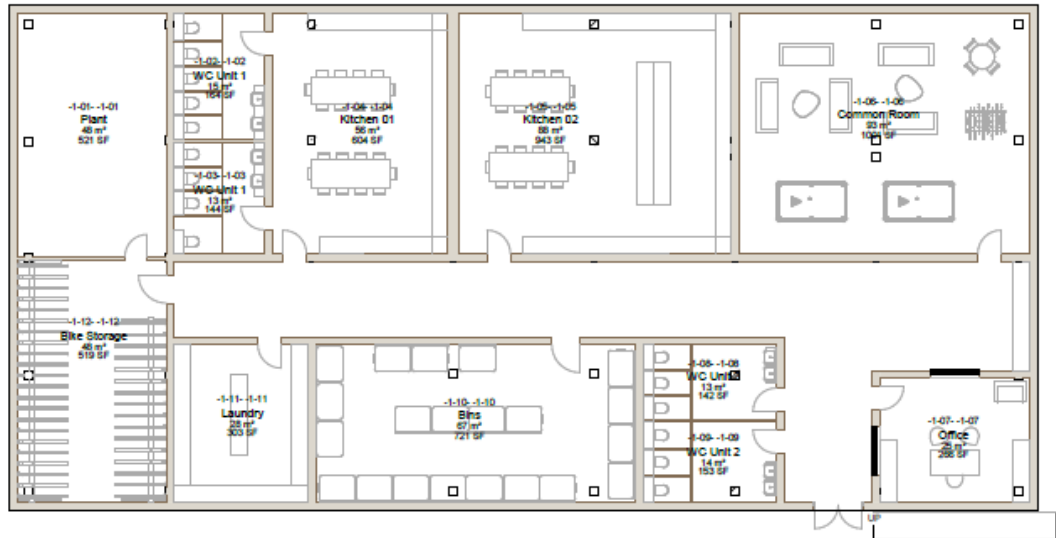


PICASSO HOUSE – PROPOSED GROUND FLOOR PLAN



PICASSO HOUSE – PROPOSED FIRST FLOOR PLAN

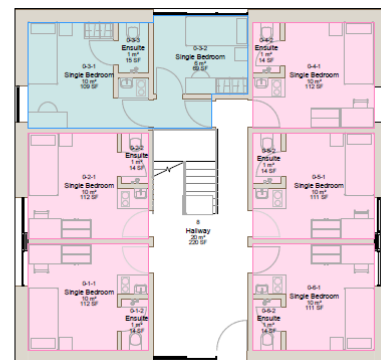
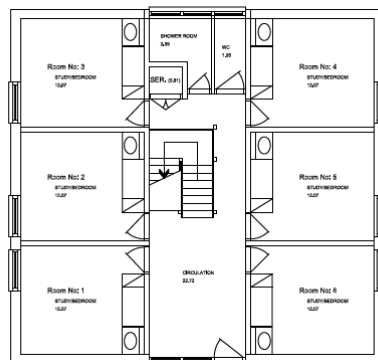
- 4.6 At basement level, the proposals will provide communal facilities, inclusive of bike store, laundry room, common room, kitchens and dining spaces. These facilities are afforded with an existing ramped access, affording disabled access, and are proposed to be accessible to all residents across the Site. A Site Management office is also located at this level.



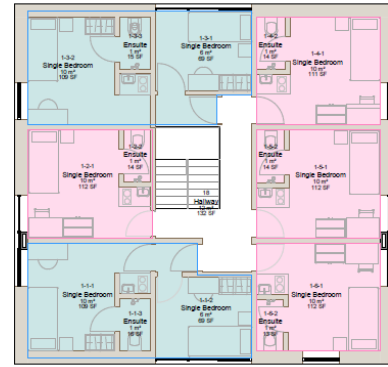
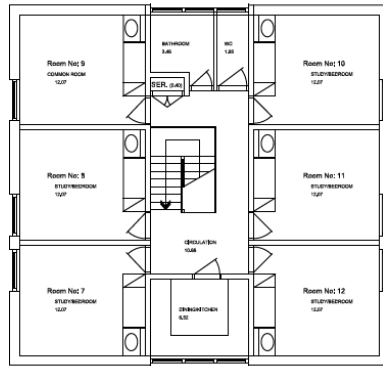
PICASSO HOUSE – PROPOSED BASEMENT PLAN

ACCOMMODATION BLOCKS (BLOCKS A – E)

- 4.7 The 5no. 1960s accommodation blocks have fallen into a state of disrepair and require renovations. Each block is formed of identical, 2-storey square modules, grouped in threes. This scheme proposes identical renovations to each square module, updating them to meet contemporary comfort and safety standards for temporary accommodation, providing a mix of single bed units with ensuites and two-bed units with ensuites.
- 4.8 The proposed units in these blocks range between 12 sqm and 20 sqm in area.

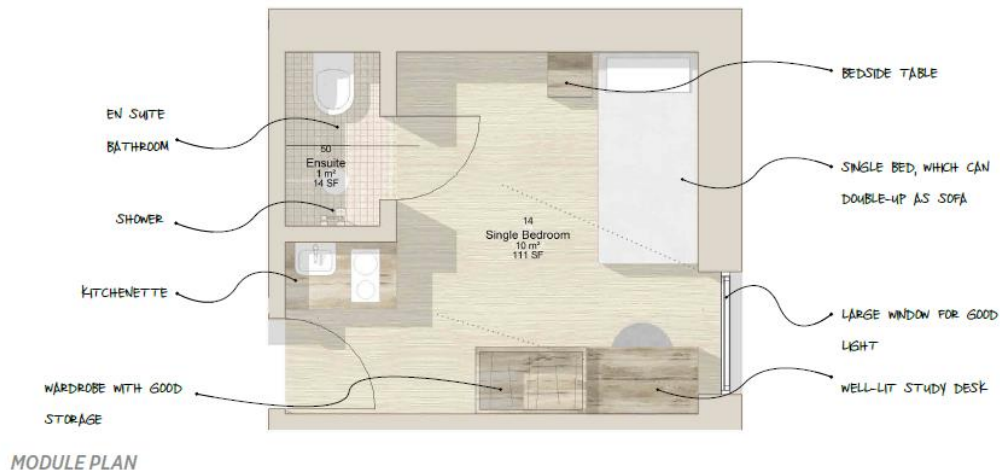


TYPICAL TEMPORARY ACCOMMODATION ARRANGEMENT
GROUND FLOOR – EXISTING (LEFT) AND PROPOSED (RIGHT)



**TYPICAL TEMPORARY ACCOMMODATION ARRANGEMENT
FIRST FLOOR – EXISTING (LEFT) AND PROPOSED (RIGHT)**

- 4.9 The proposals will refurbish the existing residential units to a good quality standard. The units will be formed of well-designed repetitive modules. The proposed units will comprise well designed storage solutions, be well lit, adaptable, and contain areas allowing personalisation, such as cork boards.
- 4.10 Each of the proposed modules contain kitchenettes and an ensuite shower room, providing more comfort and privacy, as opposed to shared facilities, which are fairly standard expectations for current day temporary accommodation.

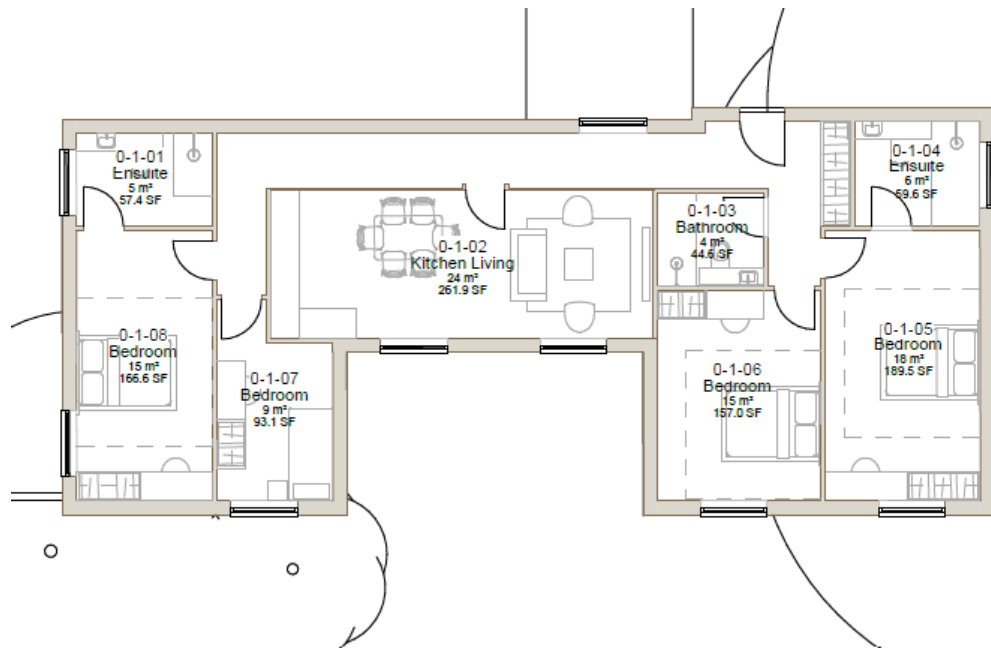


MODULE PLAN

EXAMPLE LAYOUT ILLUSTRATION

BUNGALOW

- 4.11 The existing bungalow, at the southeastern corner of the Site has fallen into a state of disrepair. It is proposed that the bungalow is restored to provide additional temporary accommodation. The bungalow comprises 5 bedrooms, with associated ensuite/bathroom facilities, as well as communal kitchen/living.



BUNGALOW – PROPOSED LAYOUT

- 4.12 The total number of units proposed amounts to 210no. across all blocks. These units will deliver a total of 274no. bedrooms across all blocks.

MOUNT CLARE HOUSE

- 4.13 Mount Clare House, (and the Temple, and other Dilapidated Outbuildings) are unaffected by the works. However, the funds generated through the temporary accommodation use will allow for the wider Site to be more actively managed, kept secure, and to avoid further degradation until a more permanent and appropriate uses can be found. The Temple will be retained in its current position and preserved.
- 4.14 Listed building consent (2024/0199) has been granted for minor enabling works in connection with the use for temporary accommodation.

ACCESS

- 4.15 The proposals will maintain vehicular access as existing. Vehicular access is facilitated from Minstead Gardens to the Site. 25no. parking spaces are available to the northwest of Mount Clare and Picasso House, with space for 27no. on street vehicle parking spaces along Minstead Gardens. Parking space provision will remain as existing.
- 4.16 Existing pedestrian paths across the landscape onsite will be retained.
- 4.17 In terms of cycle parking, there is some existing provision on Site, however this will be substantially improved. External Sheffield stands will be added outside each of the accommodation block entrances, improving cycle access onsite. The existing sheltered cycle store outside of Picasso House will be retained together with a new, internal store

is provided with lower ground level of Picasso House, together providing a total of 106no. spaces.

- 4.18 In respect of waste storage and collection, a new bin and recycling store is proposed in the basement of Picasso House. This will be accessed from the Minstead Road entrance to accommodate servicing. The basement of Picasso House is accessible by a ramped entrance, thereby allowing refused bins to be easily wheeled out and collected from the parking/serving area along the northern boundary of the Site. Emergency access will remain unchanged.
- 4.19 Natural child play space is proposed to be integrated between A, B and C accommodation blocks, to serve residents of the temporary accommodation.

5.0 RELEVANT PLANNING FRAMEWORK

NATIONAL

- 5.1 Central Government guidance is contained in the National Planning Policy Framework (NPPF), which was updated in December 2024. The NPPF reinforces the Development Plan led system and does not change the statutory status of the development plan as the starting point for decision making. The relevant Planning Framework comprises the following.
- 5.2 The NPPF must be considered in the preparation of local and neighbourhood plans and is a material consideration in planning decisions. It should be noted that the NPPF requires local planning authorities to apply the presumption in favour of sustainable development when assessing and determining development proposals.

REGIONAL

The London Plan 2021

LOCAL

Wandsworth Local Plan 2023
Roehampton SPD 2015
Alton Area Masterplan 2014

- 5.3 Additional guidance is provided within the Proposal Map extract below which confirms that the Site is subject to the following designations:

- Specific Site Allocation (Allocation RO2: Mount Clare, Minstead Gardens)
- Roehampton and Alton Estate Regeneration Area
- Alton Estate Conservation Area
- Archaeological Priority Area (part)
- Tree Preservation Orders



PROPOSALS MAP EXTRACT

6.0 PLANNING ASSESSMENT

a) PRINCIPLE OF DEVELOPMENT/NEED

- 6.1 Paragraph 61 of the NPPF (2024) states that, ‘to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, *that the needs of groups with specific housing requirements are addressed* and that land with permission is developed without unnecessary delay. The overall aim should be to meet an area’s identified housing need, including with an appropriate mix of housing types for the local community.
- 6.2 Paragraph 62 adds that within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes.
- 6.3 The London Plan, Policy H12 (Supported and specialised accommodation) adds that the delivery, retention and refurbishment of supported and specialised housing which meets an identified need should be supported. The form this takes will vary, and it should be designed to satisfy the requirements of the specific use or group it is intended for, whilst providing options within the accommodation offer for the diversity of London’s population, including disabled Londoners within a wider inclusive community setting. Boroughs should undertake assessments of the need for short-term, medium-term and permanent supported and specialised accommodation within their borough.
- 6.4 Furthermore, Policy H12 explains that supported and specialised accommodation could include the following:
- Accommodation for people leaving hostels, refuges and other supported housing, as well as care leavers and people leaving prison to enable them to live independent
 - Accommodation for young people with support needs
 - Reablement accommodation (intensive short-term) for people who are ready to be discharged from hospital but who require additional support to be able to return safely to live independently at home, or to move into appropriate long-term accommodation
 - Accommodation for disabled people (including people with physical and sensory impairments and learning difficulties) who require additional support or for whom living independently is not possible
 - Accommodation (short-term or long-term) for people with mental health issues who require intensive support
 - Accommodation for rough sleepers
 - Accommodation for victims of domestic abuse

- Accommodation for victims of violence against women and girls
- 6.5 Under the provision of the adopted Wandsworth Local Plan (2023), the Site is situated within the Roehampton and Alton Estate Regeneration Area. The Site falls under Site Allocation RO2 (Mount Clare, Minstead Gardens, Roehampton).
- 6.6 Strategic Policy PM7 explains that development within Roehampton and Alton Estate Regeneration area will help meet the borough's housing target. The area has capacity to provide 849no. homes by 2032/2033 over the first 10 years of the Plan period.
- 6.7 Furthermore, the policy states that proposals for regeneration of the area must contribute to improving the quality of existing building stock and the public realm and open spaces.
- 6.8 Development proposals should look to conserve and enhance existing heritage assets and their settings and respond sensitively to the special character and qualities of the area. In addition, development should ensure that biodiversity, and the recreational, leisure, play and amenity functions of open spaces are enhanced for the benefit of new and existing residents and the quality of public realm is improved.
- 6.9 Site Allocation RO2 (Mount Clare, Minstead gardens, Roehampton, SW15) states that the Site is allocated for mixed-use development with residential uses. In terms of development considerations, the supporting allocation text explains that any proposals must consider the future role of the Doric Temple and provide a scheme for its long-term management and maintenance. Any development would need to respect the scale and setting of the heritage assets.
- 6.10 The design requirements of the Site Allocation further stipulate that any replacement of the 1960s buildings should seek to re-assess the landscape significance of the site and seek to inform and re-interpret the principles of the Capability Brown landscape.
- 6.11 It is noted that the Site's allocation is for mixed-use development with residential uses, along with vision for long-term management and maintenance of the historic Temple. It is the Applicant's intention to deliver on this allocation and future proposals are being developed. Nonetheless, the existing buildings are dilapidated and offer the opportunity to be brought into meaningful use for residential use, in the form of temporary accommodation.
- 6.12 The Council's Housing and Homelessness Strategy sets out the plans for its housing and homelessness services, which includes tackling homelessness and rough sleeping and supporting vulnerable residents.
- 6.13 Local Plan Policy LP31 (Specialist Housing for Vulnerable People and for Older People) notes that proposals for the development of specialist and supported housing will be supported where: the Applicant can robustly demonstrate that the accommodation meets an identified need, having regard to the evidence set out in the Council's most up-to-date Local Housing Needs Assessment, where this is relevant, and the Council's

- commissioning and housing strategies; the accommodation is of a high quality and meets relevant best practice guidance for this type of accommodation; the accommodation has access to good levels of public transport, and to shops, services and leisure facilities appropriate to the needs of the intended occupiers; and Affordable housing is provided, in accordance with Policies H4, H5 and H13 of the London Plan.
- 6.14 According to Wandsworth's Temporary Accommodation Allocation Guidelines 2023/24, the Borough, in common with most London boroughs, and certainly with inner London boroughs, is facing rising demand for statutory homelessness services and has done so since 2010/11. Securing private rented properties which are affordable to homeless households in Wandsworth is extremely (and increasingly) challenging. Private rents are amongst some of the most expensive in London and most homeless households have low incomes. As at 31/03/2023, the Council was providing temporary accommodation for 3,590 households (all households sizes); which increased from 3,198 a year earlier and from 424 at 31/3/2010. Within that increase, homelessness from the private rented sector, in common with regional trends, has risen sharply to be largest single cause of homelessness.
- 6.15 The Allocation Guidelines further notes that at the end of March 2023, 53% per cent of all temporary accommodation used was located within the Borough, with a further 12% per cent located in other Southwest London Boroughs (principally the adjacent borough of London Borough of Croydon and London Borough of Lambeth), with 24% elsewhere in London or outside. During 2022/23, 3,307 people made a homeless application, increasing from 2,888 (an increase of 13%) 1,204 households were placed into temporary accommodation, around 23 households week.
- 6.16 In a Report by the Executive Director of Housing and Regeneration providing an update on Housing Servicing activity in the borough, which was presented to the Housing Committee on 23rd January 2024, this report confirms that at the end of November 2023, when temporary accommodation stood at 3,717 placements (compared with the start of year position of 3,590 and to the approved end of year forecast of 3,647), at the same date, the overall supply of accommodation becoming available for letting was 252 properties behind forecast, with lettings across the housing queues also 252 lettings behind forecast.
- 6.17 The Council aims to procure as much private accommodation in Wandsworth or as close to it as practicable as it can. However, most London boroughs face similar challenges and often need to find accommodation outside of the borough, resulting in residents leaving their family network, established schools etc.
- 6.18 The Applicant considers that the Site benefits from an existing broad hostel use. There is no restriction either implied in the terms of the deemed approval or by way of express planning condition that limits the use of the buildings to student accommodation.
- 6.19 Notwithstanding the above, which is currently being confirmed by way of a certificate of lawfulness (subject to a separate appeal process following refusal of ref. 2024/2089), in light of the Council's previous views, and on a without prejudice basis, the Applicant's proposed temporary accommodation reconfigures the vacant hostel accommodation

- blocks at the Site to provide higher quality and more modern units. The units at the first floor of Picasso House will be refurbished to include ensembles. The ground floor will provide a series of dedicated wheelchair accessible units, with level thresholds and level access throughout. Communal facilities will be provided at the basement level of Picasso House, including a bike store, laundry room, common room, kitchens and dining spaces.
- 6.20 All of the proposed 1 – 2 bedroom units range between 12 – 20 sqm in area. The proposed units within Picasso House range between 52 – 158 sqm in area. All units receive natural light through appropriate windows with good aspect and outlook. With regard to the former accommodation blocks, these are proposed to be reconfigured internally as shown in typical floorplans outlined in Section 4 of this Statement, to provide ensuite and kitchenette facilities, as requested through discussions with the Council’s housing team.
- 6.21 In total, the proposals will provide 210no. units, comprising 274no. bedrooms in total, making a significant and much needed contribution towards the Borough’s needs. The accommodation will be offered to Wandsworth Council on a first refusal basis.
- 6.22 The accommodation available is considered to be of an appropriately high quality to meet relevant best practice guidance for this type of accommodation, and in support of the guidance set out within the Housing Act (1990).
- 6.23 The accommodation will also have access to good levels of public transport, and to shops, services, and leisure facilities, appropriate to the needs of the intended occupiers. Whilst the Site has a PTAL of 2, Danesbury Avenue/Minstead Gardens bus stop is approx. 0.1 miles from the Site, with frequent bus services (170 to Victoria, 430 to South Kensington, 639/670 to St John Bosco College, and the N74 towards Baker St. Barnes Overground Station is also 1.5miles from the Site.
- 6.24 There are numerous local amenities in the Local Area including retail and NHS surgery at Portwood Place, and a larger local parade along Danesbury Avenue, approaching Roehampton Lane to the east, including Roehampton Library, Co-Op, Premier, Subway, laundrette, hot food take-away, etc.
- 6.25 As noted above, the proposed accommodation will be offered on a first refusal basis to Wandsworth Housing Team, with whom discussions are ongoing.

b. Management/ Neighbouring Amenity

- 6.26 The Council’s Local Plan policy LP2 (General Development Principles (Strategic Policy)) sets out the general principles for development in the Borough. Part B of the policy aims to protect the living conditions and amenity of occupants of new, existing, adjoining and neighbouring buildings as far as possible from the impacts of new development. The policy states that development proposals must not adversely impact the amenity of existing and future occupiers or that of neighbouring properties or prevent the proper operation of the uses proposed or of neighbouring uses. Proposals will be supported where the development would not lead to detrimental effects on the health, safety and the amenity of existing and new occupiers, and the amenity of occupiers/users of nearby

- properties through unacceptable noise, vibration, traffic congestion, or other disturbances.
- 6.27 Local Plan Policy LP28(B) (Purpose-Built Student Accommodation) states that 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).
- 6.28 Supporting paragraph 17.39 explains that Policy LP28(B) seeks to protect against the loss of existing student accommodation. This is to ensure that the loss does not adversely impact on existing capacity or existing residents. However, flexibility will be applied where it can be clearly demonstrated that demand for the provision in question no longer exists.
- 6.29 Should the proposed development be considered to comprise loss of student accommodation, it is clear that the policy test in LP28(B) is satisfied because the facility no longer caters for current or future needs (having been underused for a number of years); the proposed temporary accommodation meets other Local Plan housing requirements; and there is no net loss of residential floorspace.
- 6.30 Effective management is central to the successfulness of the proposed accommodation. A manager unit is to be provided as part the proposals at the ground floor of Picasso House, together with management office at basement level.
- 6.31 We provide an overview of the relevant management protocols:

Screening and Selection Process

- *Temporary accommodation is only used for households where household is eligible; reason to believe' that there is a priority need for accommodation. There are also a number of emergency categories, such as fire or flood, which also place a household into this category. Placements into temporary accommodation are made when homelessness cannot be prevented, such as a household being evicted by a private landlord.*
- *A Temporary Accommodation Request Form is completed by the Homeless Officer. This form not only confirms the reasons for the placement but also details any history of anti-social behaviour, other violence and or rent arrears. The Homeless Officer must be satisfied, as much as is reasonably possible, that a household is able to live independently, pay their accommodation charges and look after the property they are given.*

Security

- *The proposed will accommodate a manned Security Desk in Picasso House. The buildings will have 24 hour CCTV cameras, covering the perimeter of the building and all access and exit points, and central courtyard.*
- *There will be an on-site management presence at the premises 24 hours a day, 7 days a week. The likelihood of anti-social behaviour is minimal from these households given their precarious status whilst in emergency accommodation. Any such behaviour will lead to eviction.*
- *Households are issued and are required to sign a non-secure licence, given rules and regulations which they must follow, including restrictions on visitors. The licence can be ended with 'reasonable notice' or with immediate effect for any serious incidents. It is distinct from a short hold tenancy where it would be more difficult to remove a disruptive individual.*
- *Residents will be expected to observe the rules and regulations of the premises, this will include, but is not limited to, noise, visitor restrictions and anti-social behaviour. In this regard, a definition of 'anti-social behaviour' is provided and details given for the process of managing problematic residents.*
- *Residents are not expected to own a car and therefore it is not expected for there to be any significant additional comings and goings to and from the site by personal vehicles.*

Zero Tolerance to Anti-Social Behaviour

- *The Applicant will operate a zero-tolerance attitude to anti-social behaviour.*
- *Residents are made aware of the consequences of not adhering to the terms and conditions of the License Agreement and any additional rules and regulations*
- *Residents must not engage in anything that may cause discomfort/inconvenience to other residents or anyone living in close vicinity. Anti-social behaviour can include but is not limited to the following, noise, harassment and damage.*
- *Any act or failure to act which is intended to harm the peace and comfort of anyone or to inconvenience them in any way.*
- *The Applicant upholds the importance of ensuring that all residents feel safe, and their wellbeing is not compromised at any time by anyone residing on or visiting the premises.*
- *There will be zero tolerance to any illegal activities occurring on the premises and will actively work with the Police to ensure the perpetrator is dealt with appropriately and that their accommodation is withdrawn, this includes the use of illegal substances and the selling of them on the premises.*

Checks/Visits

- *Managers will be on site daily. A security guard will be on reception duty 24 hours a day, 7 days a week.*
- *Support Workers, who are responsible for cleaning and maintaining the property will be on the premises Monday to Friday.*
- *Regular health and safety visits are carried out which includes a monthly check of each unit of accommodation. Other visits, including 'occupancy' checks and welfare visits are carried out regularly and on an ad hoc basis.*

- 6.32 With a robust plan in place, it is considered that the proposed accommodation will be actively managed to avoid the potential for harm to neighbouring amenity. A more detailed management plan can be secured by condition, which will be developed further in consultation with the Council's housing team.

c. Fire Safety

- 6.33 London Plan Policy D12 notes that in the interest of fire safety, all development proposals must achieve the highest standards of fire safety and ensure they *Identify suitably positioned unobstructed outside space for fire appliances to be position on and, appropriate for use as an evacuation assembly point.*
- 6.34 The policy further seeks that development are constructed in an appropriate way to minimise the risk to life, including alarm systems; constructed in an appropriate way to minimise the risk of fire spread; provide suitable and convenient means of escape, and associated evacuation strategy for all building users; and develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in; and provide suitable access and equipment for firefighting. Major developments are expected to submit a Fire Statement.
- 6.35 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.
- 6.36 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. A fire appliance would be able to park in these locations (coloured red), providing unobstructed access to the Site. The various buildings on Site are linked through a series of paved walkways. The Site is served by a number of refuge points, marked in orange.



ACCESS - SITE PLAN

d. Air Quality

- 6.37 Local Plan Policy LP14 (Air Quality, Pollution and Managing Impacts of Development), part C (Air Quality) states that the Council will support developments which incorporate 'air quality positive' design and the use of new technologies. Development proposals must be at least 'Air Quality Neutral' and should not contribute to worsening or air quality during the construction or operation stage, in accordance with Policy SI I of the London Plan. Part D1 of the policy states that an air quality impact assessment will be required, supported by the modelled dates, where necessary.
- 6.38 The proposed development simply seeks continued use of the relevant properties for temporary accommodation. Nonetheless, this submission is supported by an Air Quality Assessment, prepared by Aeolus.

- 6.39 Operationally, the properties will continue to be occupied by individuals on a shorter-term residential basis. There is no change proposed to the power or heating systems at the Site, these are existing and will continue to serve the properties following the change of use.
- 6.40 Therefore, there is not expected to be any effect on air quality as a result of the proposed use for temporary accommodation.

e. Biodiversity and Biodiversity Net Gain

- 6.41 Local Plan Policy LP55 (Biodiversity) states that the Council will protect, and where possible, secure the enhancement of the borough's priority species, priority habitats and protected sites as well as connectivity between such sites. Development proposals will be required to protect and enhance biodiversity through avoiding adverse effect on the borough's designated sites of habitat species; incorporate and create new habitats or biodiversity features; ensure that new biodiversity features or habitats connect to existing infrastructure; enhance wildlife corridors where opportunities rise and maximise ecological functions within soft landscaping.
- 6.42 The application Site does not fall within any designation relating to priority habitat or protected habitats. Furthermore, the proposals do not seek any new development that would affect such habitats. There are no works of demolition, replacement, or extension. Whilst there would be some minor internal reconfiguration to the buildings, the proposals simply seek use of the existing buildings for temporary accommodation.
- 6.43 Nonetheless, this submission is accompanied by an Ecological Report, prepared by AA Environmental Limited (AAE). AAE have carried out ecological surveys, supplemented by obtaining available baseline data from Greenspace Information for Greater London. The findings from the surveys and review of baseline data have provided information to assess the impact of the proposals on species and/or features of ecological/biodiversity value.
- 6.44 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.
- 6.45 The proposals avoid any effect on Biodiversity (de minimis) and are therefore exempt from requiring to show net gain. The verdant and well landscaped grounds are retained and will continue to be maintained.

f. Sustainability/Energy/Whole Life Cycle

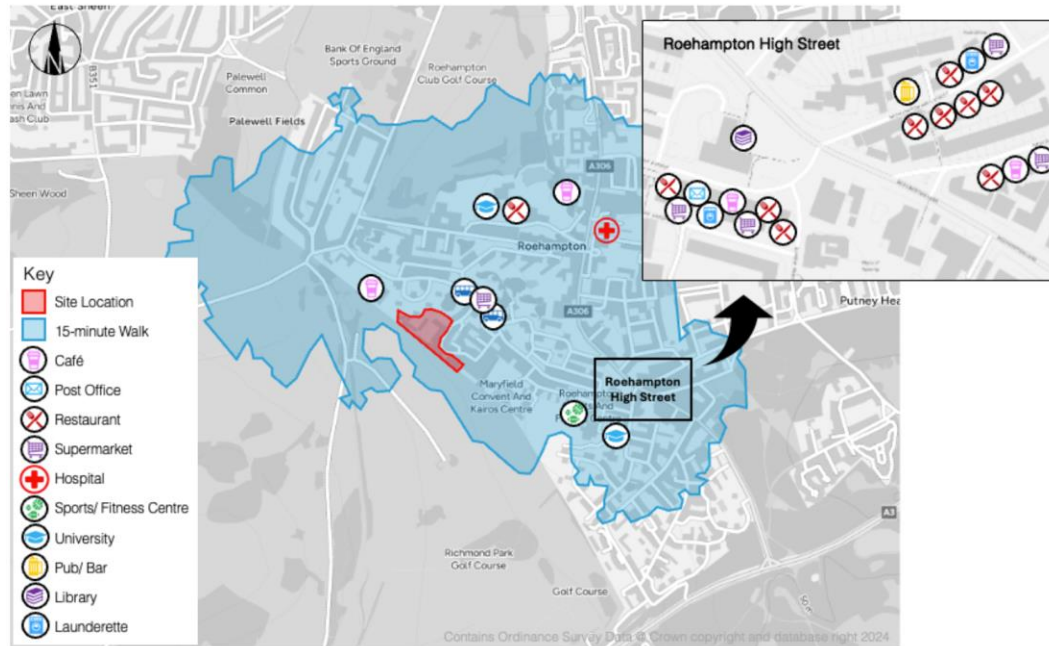
- 6.46 Local Plan Policy LP10 (Responding to the Climate Crisis), requires major developments to submit a Whole Life Cycle Assessment. Paragraph 15.12 of the policy notes that the

Mayor's Energy Supplementary Planning Guidance (SPG) (2020) provides further technical guidance on the operation and implementation of the principles in new development.

- 6.47 Part A.5 seeks to retain existing buildings and their embodied carbon in renewal and regeneration projects where this is a viable option.
- 6.48 As noted earlier in this Statement, the proposals seek use of the existing buildings for temporary accommodation for vulnerable individuals on the Council's housing waiting list. 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.
- 6.49 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.

g. Community Facilities Assessment

- 6.50 The Site is located to the northeast of Richmond Park Golf course beyond which lies Richmond Park and is bounded by Minstead Gardens to the South.
- 6.51 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.
- 6.52 The Site is allocated, as part of a wider allocation, for mixed-use, housing-led regeneration through a collaborative masterplan process to include a mix of housing, new retail and employment uses, new and improved community facilities, open space, and public realm improvements. It is expected that any development at the Site should contribute towards providing significant levels of additional housing in the area, including replacement and new affordable housing and meet the vision and objectives set out in the Roehampton and Alton Estate Regeneration Area Strategy with the opportunity for the provision of a cultural anchor space as part of a new civic focus at the heart of the development.



LOCAL AMENITIES

- 6.53 The use of the existing buildings will provide much needed temporary accommodation housing to address current shortfall. Having regard to this proposed use, the Site is considered to be well served by local community facilities to serve the day to day needs of the residents who are existing Wandsworth residents.

h. Contaminated Land Assessment

- 6.54 Part H of Local Plan Policy LP14, notes that where development is proposed on contaminated or potentially contaminated land, a desk study and site investigation in line with up-to-date guidance will be required.
- 6.55 We attach, at Appendix 2, a historical overview of the Site, and a fuller Heritage Statement at Appendix 3, prepared by Bridge Associates.
- 6.56 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.
- 6.57 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 18th century houses in the area, included Mount Clare, were preserved, but the gardens developed.
- 6.58 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 halls of residence. The accommodation blocks were

- built around the house. The landscaped grounds were altered to accommodate the new site arrangement.
- 6.59 Finally, from 1986, the site has been occupied by the University of Greenwich, the University of Surrey, and most recently, the University of Roehampton.
- 6.60 Accordingly, the Site is not suspected to be contaminated.
- 6.61 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.

i. Heritage

- 6.62 Heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations (NPPF, 2024, para 202).
- 6.63 Para 207 of the NPPF (2024) notes that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 6.64 In determining applications, local planning authorities should take account of a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness.
- 6.65 When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 6.66 Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 6.67 Local Plan (2023) Policy LP3 states that proposals will be supported where they sustain, preserve and, wherever possible, enhance the significance, appearance, character, function and setting of any heritage asset (both designated and non-designated), and the historic environment.

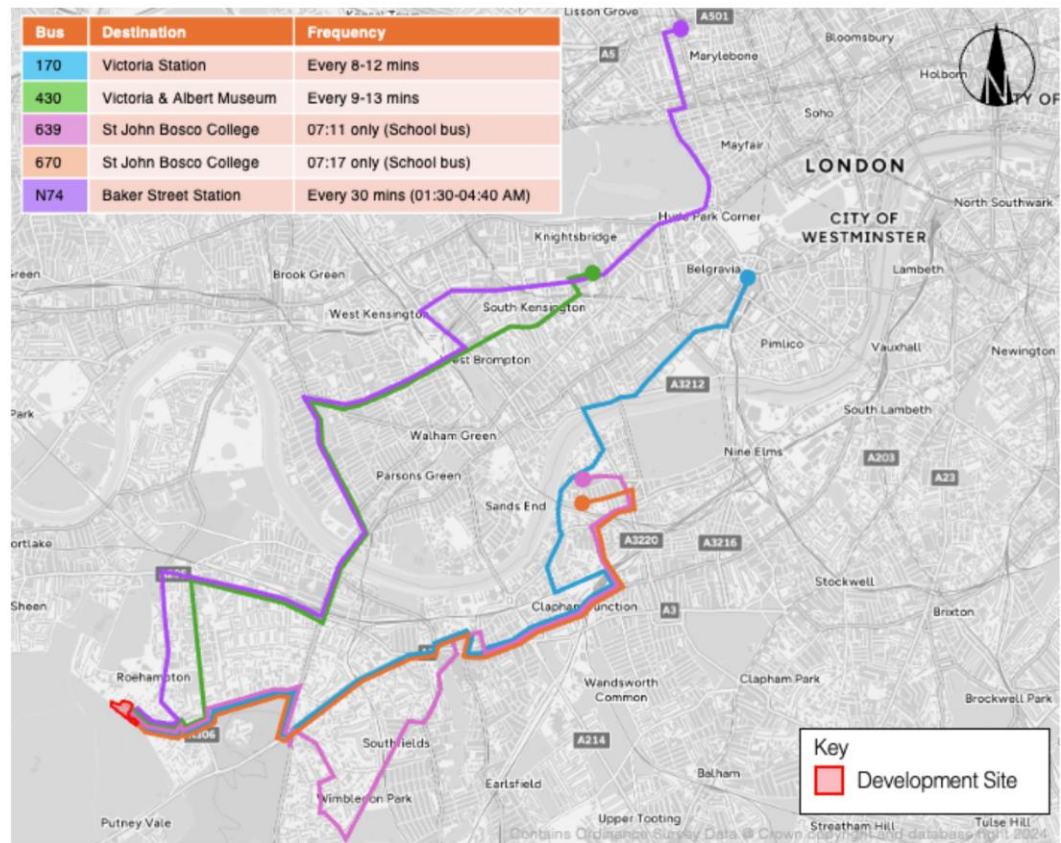
- 6.68 The existing buildings on Site are vacant. The vacancy of the building and the age of the buildings, particularly Mount Clare House, makes them vulnerable to damage, both through their non-use, unheated etc, but also their relatively isolated nature and therefore potential for deliberate damage through anti-social behaviour.
- 6.69 The Applicant is in the process of developing long term proposals for the principal building, Mount Clare House, however, this is likely to take some time to resolve. Accordingly, and in consultation with the Council's housing team, it is sought to get the hostel buildings back into meaningful use, until the longer-term aspirations of the Site can be realised.
- 6.70 No works are proposed to the grade I listed Mount Clare House.
- 6.71 With regard to Picasso House, an unlisted building, only minor internal reconfiguration works are proposed.
- 6.72 With regard to the accommodation blocks, again only minor internal works are proposed to allow their occupation for temporary accommodation.
- 6.73 No external changes are proposed to the external parts of the buildings.
- 6.74 Accordingly, the proposed works are considered to result in no harm to the significance of the designated heritage assets at the Site.
- 6.75 Notwithstanding the absence of any harm, the proposals will result in significant public benefits including securing much needed temporary accommodation to alleviate the pressures on the Council's housing waiting list, getting the buildings back into meaningful and managed use and reduce the potential for damage to the heritage assets, and securing the Site's optimum viable use.
- 6.76 It should also be noted that Listed Building Consent (ref. 2024/0199) had already been sought for minor enabling works at the Site. This was granted on 26th September 2024 and indicates the Applicant's commitment to preserving the listed buildings of Mount Clare and the Temple.

j. Transport

- 6.77 The NPPF (2024) paragraph 116 notes that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be *severe*, taking into account all reasonable future scenarios.
- 6.78 Local Plan Policy LP49 (Sustainable Transport) states that the Council will support proposals that reduce the need to travel and will work to promote safe, sustainable, and accessible transport solutions for all users, which minimise the impacts of development including congestion, air pollution and carbon dioxide emissions, and maximise

- opportunities for health benefits and providing access for all to services, facilities and employment.
- 6.79 Development proposals will be expected to be people focused and meet the Healthy Streets objectives which put human health and well-being at the centre of transport planning.
- 6.80 Proposals will be supported where, amongst other things, the proportion of trips made by walking, cycling and public transport is high, and local connections by these modes are improved; car dominance is reduced, and active use of streets and public spaces is increased; and neighbourhood environments are made safer, including reducing road danger, and improving personal security.
- 6.81 Referring to the Roehampton SPD, Core Principle 7 outlines ambitions to improve access and connections. Part D requires developments to make a financial contribution towards the improvements to public transport to import connectivity. With reference towards increasing the frequency of existing bus routes, extension of bus routes and improving connectivity to Barnes Station.
- 6.82 The proposed use acknowledges national, regional, and local policies relating to sustainable transport. No changes are proposed to the current accesses, car parking, and servicing arrangements. A Transport Statement has been prepared by Mode to accompany this application.
- 6.83 In summary, the submitted Transport Statement has identified the following:
- The Site is well positioned to benefit from sustainable travel accessibility, including walking, cycling, and public transport infrastructure.
 - PTAL and TIM analysis have been undertaken to demonstrate that the Site has good sustainable transport links, and a number of key areas can be reached within 60 minutes of travel.
 - Access to the Site will remain unchanged for the temporary accommodation units, which can all be accessed from Minstead Gardens and Tunworth Crescent.
 - Servicing will be undertaken from the Minstead Gardens access. Deliveries will remain as existing with loading and unloading being undertaken in the designated parking bay.
 - The site will provide cycle parking above the London Plan and LBW parking standards, with 106 cycle parking spaces provided.
 - A car ownership assessment has been undertaken using 2021 census data to demonstrate that the proposals may generate a worst-case demand for 68 cars requiring access to the site, which can be accommodated on-site and off-site as demonstrated by parking beat survey results.

- The proposal to retain the existing car parking provisions is deemed suitable for this development and will not pose an impact on the local highway network, including in relation to trip generation, as agreed to be the case with the LBW highways officer.



BUS ROUTES FROM MINSTEAD GARDENS

- 6.84 The Statement concludes that it is considered that the proposals are acceptable in transport terms and are in accordance with National, Regional, and Local Policy. Through discussion with the Council's Highways Team, it is acknowledged and confirmed that the transport impacts of the development would be negligible in comparison to the extant and historic use of the Site. Therefore, there are no transportation reasons why planning consent should not be granted.
- 6.85 The existing buildings have access to good levels of public transport, and to shops, services, and leisure facilities, appropriate to the needs of the intended occupiers. Whilst the Site has a PTAL of 2, Danesbury Avenue/Minstead Gardens bus stop is approx. 0.1 miles from the Site, with frequent bus services (170 to Victoria, 430 to South Kensington, 639/670 to St John Bosco College, and the N74 towards Baker St. Barnes Overground Station is also 1.5 miles from the Site.
- 6.86 Aligning with both the Roehampton SPD and Alton Area Masterplan would only improve the connectivity of the site. Figure 4.3 for the plan, relates to the access and movement principles which proposes opportunities for bus extensions, new connections, and

improving and upgrading existing crossings and surfaces. These plans would certainly improve the PTAL rating, which the Applicant fully encourages. Nonetheless, there are already numerous local amenities in the Local Area as expressed in the diagram below, extracted from the Roehampton SPD. The local area accommodates retail, NHS surgery at Portwood Place, and a larger local parade along Danebury Avenue, approaching Roehampton Lane to the east, including Roehampton Library, Co-Op, Premier, Subway, laundrette, hot food take-away, etc.

k. Urban Greening

- 6.87 In accordance with London Plan Policy G5, major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls, and nature-based sustainable drainage.
- 6.88 The proposals do not seek any new built 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.

l. Waste Management Plan

- 6.89 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.
- 6.90 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.
- 6.91 The final details in relation to Waste Management are to be detailed by the end operators.

7.0 STATEMENT OF COMMUNITY INVOLVEMENT

- 7.1 Major applications should be supported by a statement setting out how the Applicant has complied with the requirements for pre-application consultation set out in the local planning authority's adopted statement of community involvement and demonstrating that the views of the local community have been considered in the formulation of development proposals.
- 7.2 The Applicant has consulted with the Local Authority, including the planning and housing team. The Applicant has consulted at length with the Council's housing team, who are acutely aware of the pressing need for the type of temporary accommodation sought.
- 7.3 Furthermore, given the vacant and vulnerable nature of the existing buildings on Site, time is of the essence to ensure that the buildings can be made secure, whilst being put into meaningful use. Accordingly, the Applicant relies on the LPA's statutory consultation which is considered acceptable in this particular case.
- 7.4 The Applicant has also engaged with the Putney Society, having made it clear that they are keen to work with the Society in a collaborative manner. A meeting with the Society in August 2024. It was advised that the Putney Society's priority here was to find a use for the listed buildings individually and the estate as a whole, that provide long term funds to support the two listed buildings, each in a suitable setting. Discussions will continue.

8.0 SUMMARY AND CONCLUSIONS

- 8.1 This statement has been prepared by NTA Planning LLP, on behalf of AKA Capability LLP, the owners of Mount Clare House and its associated buildings, in Roehampton, London SW15 4EE.
- 8.2 The 1.59ha Site, comprises Mount Clare House, a Grade I listed 'Palladian' building and was last in use as offices/administration, by Roehampton University. The Site also accommodates Picasso House, a two storey 1960s block, together with two-storey accommodation blocks. The Site further accommodates Mount Clare Temple (Grade II* listed), a Lodge (uninhabitable), and other Dilapidated Outbuildings. The Site is currently under used and was last used by the University of Roehampton.
- 8.3 The Applicant seeks to get the existing buildings back into meaningful use. The Applicant seeks to use Picasso House and accommodation blocks (Blocks A – E), as well as the Bungalow, for temporary accommodation alongside associated landscaping.
- 8.4 The Council has an acute need for this specialist form of housing, and it is noted that the Council are currently 252 properties behind its forecast provision, with lettings across the housing queues also 252 lettings behind forecast.
- 8.5 The Applicant considers that the Site would lend itself well for use as temporary accommodation. Indeed, that the existing site was originally consented for hostel use, and that the continued use for temporary accommodation does not strictly require prior planning consent. However, having regard to recent planning history, and the views set out by Wandsworth planning, the Applicant seeks permission for the use on a without prejudice basis.
- 8.6 Through the proposed use, utilising the existing accommodation available across the relevant buildings, there is capacity for up to 274 rooms to be made available for Temporary Accommodation, meeting local acute need.
- 8.7 No works are proposed to Mount Clare House - the Grade I listed building. The funds generated through the temporary accommodation use will allow for the wider Site, including other buildings which are not affected by the proposals, to be actively managed, kept secure, heated in the case of Mount Clare House, and to avoid degradation, until future aspirations for the Site can be shaped further.
- 8.8 For the reasons set out herein, we respectfully request that permission is granted for use of the existing buildings for temporary accommodation, along with associated landscaping.

APPENDICES

APPENDIX ONE
OFFICIAL LISTED BUILDING ENTRY

Official list entry

Heritage Category:**Listed Building**

Grade:**I**

List Entry Number:**1184436**

Date first listed:**14-Jul-1955**

List Entry Name:**MOUNT CLARE**

Statutory Address 1:**MOUNT CLARE, MINSTEAD GARDENS SW15**

Location

Statutory Address:**MOUNT CLARE, MINSTEAD GARDENS SW15**

The building or site itself may lie within the boundary of more than one authority.

County:**Greater London Authority**

District:**Wandsworth (London Borough)**

Parish:**Non Civil Parish**

National Grid Reference:**TQ 21623 74004**

Details

MINSTEAD GARDENS SW15 1. 5033 Mount Clare TQ 27SW 3/11 14.7.55 I 2. 1772 probably by Sir Robert Taylor, enlarged with portico and other enrichments. 1780 by Columbani, 2-storeys and basement. Five-bays. Stucco, with rusticated stone basement. Three-bay projecting centre with pediment and wood Doric tetrastyle balustraded portico with modelled plaster ceiling and WI railings raised above arched basement and approached by 2 curved flights of stone steps with WI railings. Dentil cornice. Rear elevation of 2-storeys with semi-octagonal projection in centre. Entrance hall has vaulted and shallow coffered ceiling. Geometrical stone staircase with WI balustrade. Octagon drawing room with good delicately-modelled ceiling and niches. Marble fireplaces and other good interior features. In the grounds are the dismantled remains of a circular Composite temple, the columns of which are stored in the basement. The marble capitals of 2 columns are Roman. Built by George Clive, cousin to Lord Clive. The gardens were laid out by Capability Brown. Listing NGR: TQ2162374004



APPENDIX TWO

RESEARCH CHRONOLOGY

Date	Document / Event
10 Feb 1948	LCC makes a Compulsory Purchase Order in respect of the part of the Roehampton Housing Site on which Mount Clare stands.
7 Jan 1955	Notes of a meeting between representatives of the London County Council (or "LCC") and the Ministry of Works: <i>"The London County Council representatives then explained their development proposals:</i> ... <i>(2) The future of Mount Clare was not settled but they hoped to let it and its grounds for private use"</i>
11 Oct 1957	LCC Joint Report by the Architect, Valuer and Education Officer of the LCC Education Committee – Further Education Sub-Committee, Housing Committee and Town Planning Committee states that: <i>"Mount Clare is not only a suitable location for the new college, but also offers an opportunity for early building...the accommodation would comprise hostels for 50 men and 50 women."</i> ... <i>"8. Before any works can be undertaken to further this proposal the consent of the Minister of Housing and Local Government will be required to release the Council from its undertaking to preserve the property as a Scheduled building and also for the proposed development. In view of the property's proximity to Richmond Park the consent of the Minister of Works will also be required to the proposals.</i> <i>9. The estimated cost of appropriating the property from the Housing Committee to the Education Committee including an apportioned part of the Part VI claim is the order of £14,000 and a further report in this connection will be submitted in the near future if the Committee approve in principle the proposals outlined above. This figure is subject to the approval of the District Valuer and does not include any proportion of the cost of works of restoration already incurred by the Town Planning Committee and is also exclusive of establishment charges. The incident of the cost of restoration is a matter for further consideration and possibly consultation with the Government Departments concerned.</i> RECOMMENDING - <i>(1) Approval in principle subject to the concurrence of the Finance Committee to the use of Mount Clare shown by red verge on registered plan 69125 as site for the Garnett Training College as proposed in the foregoing report, subject to the approval of the Ministry of Works and to the Ministry of Housing and Local Government to the revocation so far as may be necessary of the undertaking given by the Council to preserve the property; to the grant of town planning consent by the Minister of Housing and Local Government to the proposed work and development and to the approval of the Minister of Education.</i>

	<p>(2) <i>That the Town Planning Committee approve in principle the proposed demolition works and development in view of the scheduling of the property under S.O.165.</i></p> <p>(3) <i>That officers should be instructed at this preliminary stage to seek the informal views of the Ministries concerned on the proposal.</i></p> <p>(4) <i>That the Architect be instructed to submit detailed plans and estimates of the proposal.</i></p> <p>(5) <i>That the Valuer report at a later stage on the detailed financial implications of the proposed appropriation of land and buildings from the Housing Committee.</i></p>
16 Oct 1957	The LCC Education (Further Education) Sub-Committee approved proposals for the transfer of Garnett College to the Mount Clare site, retaining the original building as restored and erecting new blocks within the grounds.
14 Feb 1958	<p>Hansard Vol 582: Teachers (Recruitment and Training).</p> <p>In response to a recently published Ministry of Education circular on technical education, Mr Peart MP asked the Parliamentary Undersecretary for Education:</p> <p><i>"The circular contains numerous details and paragraph 6, in particular, is important. It deals with the avoidance of excess in teaching hours in our technical colleges, the provision of research facilities, adequate clerical assistance and laboratory staff and the provision of suitable accommodation. That is all very well, but I know of one case in the London area in which, although the site for a new technical college has been acquired, the building of the college has been held up. Why is the Ministry still holding up the building of an important technical college in the London area? The Parliamentary Secretary will know that I refer to the new site for the Garnett College. There has been too much delay and I am certain that there is a bottleneck somewhere. This is a vital matter. If we are to achieve the aims of the Willis Jackson Committee and also to implement the administrative circular, we must have action in that direction. I hope that the Minister is in a position to give us some information today."</i></p>
13 May 1958	<p>Ministry of Public Works memo:</p> <p><i>"The London County Council are considering the placing of single and two storey hostel buildings in the grounds of Mount Clare abutting the Park Boundary. If there is no such restriction on their land and subject to planning and bye-law requirements, the London County Council can, of course, build up to their boundary"</i></p>
4 Jun 1958	<p>Ministry of Public Works memo addressed to London County Council's Chief Architect on the subject of Mount Clare:</p> <p><i>"The Ministry has considered the diagrammatic site plan sent with your letter of the 25th of March bearing in mind the relationship of the proposed buildings to Richmond Park. The Ministry's immediate reaction is that the proposed buildings are far too close to the park boundary..."</i></p>
19 Feb 1959	Report by LCC Architect to Education (Further Education) Sub-committee and Town Planning (Architectural and Historical Buildings, etc.) Sub-Committee:

	<p><i>"The Sub-Committee were informed at their last meeting that proposals for the development of the Mount Clare and Downshire House for training college and hostel purposes to replace Garnett Training College were to be the subject of discussions with officers of the Council and the Ministries concerned. These discussion have now been concluded and firm proposals can now be submitted.</i></p> <p><i>...</i></p> <p><i>Although the Ministry of Education have to determine the ultimate size of the college it is understood that their proposals are not likely to exceed 400 places in the college and accommodation for 240 students in the halls of residence... Detailed schedules and block plans will be submitted when the Ministry's requirements are known and at that stage the Sub-Committee will be asked to instruct the Architect to proceed with the preparation of preliminary drawings and estimates."</i></p> <p><i>"Both Downshire House and Mount Clare are listed by the Minister of Housing and Local Government under Section 30 of the Town and Country Planning Act 1947 ... for preservation as buildings of architectural and historical interest. This important aspect of the proposals has been taken into account in the formulation of the outline scheme submitted which, it is understood, is likely to be acceptable to the responsible Ministries. 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 for his consent."</i></p>
9 Mar 1959	LCC Town Planning Committee minutes note that outline proposals for the use of Mount Clare and Downshire House <i>"for training college and student hostel purposes"</i> were approved in principle as a matter of urgency on 3 March 1959
24 Sep 1959	Date of LCC plans showing "hostel units" in Wandsworth's planning records
30 Sep 1959	<p>The LCC Education (Further Education) Sub-Committee Report resolved: <i>"that the plans ... showing the suggested development of Downshire House and Mount Clare ... be approved so far as the sub-committee are concerned and that observations of the Town Planning Committee thereon be sought when discussions with the Ministry of Works about the proposals for the existing buildings on the sites have been completed; and that, <u>subject to the concurrence of the Finance Committee and the approval of the Minister of Education</u>, the schedule of accommodation for the new Garnett College and its Hall of residence ... and that the Architect be authorised to prepare preliminary plans and estimates accordingly"</i></p> <p>The report also made the following recommendations:</p> <p><i>"(a) That the development of Downshire House and Mount 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</i></p> <p><i>(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 development of Downshire House and Mount Clare on the lines of the outline scheme submitted.</i></p>

	<p><i>(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.</i></p> <p><i>(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.</i></p> <p><i>“(e) That the Health and Housing Committees be informed in the relevant terms in the foregoing report.”</i></p>
20 October 1959	<p>As reported in a LCC Education Committee Report dated 11 October 1960, on 20 October 1959:</p> <p><i>“The Council ... approved the appropriation from housing purposes to education purposes of Mount Clare and Downshire House on Alton estate, Roehampton, with a view to the redevelopment of the sites on those premises for use as a training college with halls of residence for students”</i></p>
24 Mar 1960	<p>Ministry of Public Works memo:</p> <p><i>“We are now being asked to consider the effect the LCC proposals for Garnett College (as linked with Mount Clare) will have on the amenities of Richmond Park</i></p> <p>...</p> <p><i>In the absence of statutory requirements there is no reason why the LCC should not build up to this boundary but not so as to encroach on it, and provided that they do not take light and air from park land without our approval and licence.</i></p> <p>...</p> <p><i>We saw an earlier proposal in respect of this development and a letter dated 4th June 1958 was sent to the Council suggesting a set back of 70” from the boundary”</i></p>
26 Mar 1960	<p>Ministry of Public Works Memo:</p> <p><i>“Mr. Jenkins and Mr. Stephens of the LCC came to see us on Friday 25 March 1960 to discuss the proposed College buildings. Mr Lewis, Historic Buildings and Mr Wood, Architect, were present. I explained our position to the LCC representatives who said there was now a degree of urgency in the scheme because they were being pressed by the Ministry of Education as well as their own committees to start work on the site”</i></p>
16 May 1960	<p>LCC Town Planning Committee resolves to approve the detailed scheme and drawings <i>“as a training college and halls of residence”</i> and refers to Education (Further Education) Sub-Committee approval on 4 May 1960 <i>“as far as they are concerned”</i></p>
27 Jun 1960	<p>Minutes of a meeting of the Governors of Garnett College:</p> <p><i>“The Education Officer reported that the Minister of Education had approved the block plans and schedule of accommodation, that the preparation of working drawings was proceeding, and that work was expected to start in February 1961”</i></p>
8 Jul 1960	<p>Wandsworth Borough Council Town Planning Committee consulted on LCC proposals:</p>

	<p><i>"At the time [of the Alton Estate development proposals] the future proposals for Mount Clare House were not then settled ... It is now proposed to provide a college with ancillary buildings on the secretary of state two sites ...</i></p> <p><i>A two-storey staff and dining block is to be erected on the eastern side of Mount Clare House and fifteen two-storey hostel buildings are planned in the rear grounds to the eastern and western sides; Mount Clare House is to be converted to provide student's common rooms"</i></p> <p>Recommendation:</p> <p><i>"That no objection be offered provided that an existing 2ft. safety strip along the eastern boundary of Mount Clare House is widened to provide a 6ft. footpath, and any new footway crossings are constructed to the satisfaction of the Borough Council"</i></p>
5 Oct 1960	<p>Report by LCC Architect to Education (Further Education) Sub-committee:</p> <p><i>"In connection with the report previously submitted and the consultations subsequently carried out... the Borough Council state, with certain reservations regarding the access to the site from Minstead Gardens, that there is no objection to the proposals.</i></p> <p><i>The points raised by the Borough Council are of a minor nature and it is proposed to amend the working drawings to meet the Borough Council's objection"</i></p>
11 Oct 1960	<p>LCC Education (Further Education) Sub-Committee report:</p> <p><i>"With the agreement of 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 ... 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 and 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 ..."</i></p> <p>The Council also on this date approved an estimate of liability on capital account of £461,000 for the development of the sites of Mount Clare and Downshire House (As set out in an annual report of the Education Committee, dated 15 March 1961).</p> <p><i>"In the view of the unusually complicated nature of the work involving as it does two contracts, including work to two historic buildings, the Minister of Education accepts that his normal financial limits cannot fully apply and is prepared to accept the scheme on the basis of the lowest tenders, subject to the savings which we propose."</i></p>
6 Nov 1961	<p>LCC Education Officer report to the Governing Body for their meeting on 6 November 1961:</p> <p><i>"The Governing Body will remember that it was reported at the last meeting that all new and adaption building work would not be completed in time to enable the college to function in its new premises from September 1962.</i></p> <p>...</p>

	<i>Thus while, the study bedrooms, common rooms, etc., may well be ready by September 1962, the dining and staff accommodation clearly will not."</i>
8 June 1962	Hansard Vol.661: debated on Friday 8 June 1962 Mr. Hornby asked the Minister of Education what major building projects at teacher training colleges are due to be completed in 1962: Mr K. Thompson lists, among others, Garnett College valued at £454,000.
4 Sep 1963	Visitation report refers to <i>"fifteen well designed hostel units"</i> .