



LONDON BOROUGH OF WANDSWORTH

Town and Country Planning Act 1990

The Town and Country Planning (Inquiries Procedure) (England) Rules 2000

Site: Mount Clare Campus, Minstead Gardens, Roehampton Gate, London W15 4EE

Planning Inspectorate reference: APP/H5960/W/25/3371729

LPA Reference: 2025/0074

Appellant: NTA Planning LLP

Statement of Case of the London Borough of Wandsworth

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1. Introduction

- 1.1. This Statement of Case is prepared on behalf of the London Borough of Wandsworth, (the 'Local Planning Authority/LPA') in respect of an appeal against the non-determination of an application for Full Planning Permission for the following proposed development at the Mount Clare Campus, Minstead Gardens, Roehampton Gate, London SW15 4EE ('the Appeal Site'):

"Change of use of Picasso, Albers, Andre, Appell, Balla, Bellini, Blake, Cornell, Catlin, Calder, Dali, Degas, Duffy, Eakins, Epstein and Etty Houses from mixed use comprising office, student accommodation and storage to hostel for temporary accommodation to accommodate 264 rooms with common facilities, alongside the replacement of the former Lodge building and provision of ancillary refuse/cycle stores, landscaping, play space and associated works" (the 'Appeal Development').

- 1.2. This is an appeal against non-determination. The Council confirms that had it determined the application it would have refused it. This statement, together with the officer's delegated report, which is included at Appendix A sets out the Council's putative reasons for refusal, sets out the key aspects of the LPA's case in relation to the appeal and outlines the material planning considerations that have been considered as part of the assessment of the planning application. This Statement of Case does not seek to unnecessarily repeat parts of the draft officer's report but, rather, to summarise it.
- 1.3. The Local Planning Authority advised the Appellant during the course of the application that a number of shortcomings had been identified during the assessment process and outlined options to address these issues; many of these issues remain unaddressed. But, in any event, as confirmed in the reasons for refusal, the LPA considers that there are fundamental issues which could not have been addressed by the provision of further information by the Appellant and as such it is not considered that the production of additional information by the Appellant would have led to a change in the LPA's position. The structure of this Statement is as follows:

- Section 1: Introduction
- Section 2: The Appeal Site and its surroundings.
- Section 3: Planning history.
- Section 4: Relevant policies and guidance
- Section 4: The Local Planning Authority's case for non-determination and recommendation to refuse the planning application.
- Section 5: Conclusion.

- 1.4. This Statement of Case has been prepared to describe the case that the Local Planning Authority will put forward in evidence at a Public Inquiry relating to this appeal. The LPA will also make legal submissions in support of its case at the Inquiry. The LPA respectfully reserves the right to introduce additional documents or matters in the light

of the evidence and submissions made by the Appellant in the period before and during the Inquiry.

2. The Appeal Site and its surroundings

2.1. The Appeal Site comprises the Mount Clare campus, which is situated towards the south-western side of the Alton West Estate, adjacent to the boundary with Richmond Park. The Appeal Site is located in the Alton Conservation Area and contains two highly graded listed buildings, Mount Clare House, which is a Grade I listed building and the Temple, which is situated within the grounds and is a Grade II* listed building. The majority of the Appeal Site is also situated within the Alton West Registered Park and Garden, which was designated by Historic England in 2020 at Grade II.

2.2. The Appeal Site is occupied by the following buildings:

- Mount Clare: Two-storey building, which was constructed between 1770 and 1772, as a country residence. The building contains a basement and an attic roof space and features symmetrical architecture with a portico and decorative elements. The building was originally set within an open landscaped setting and it is understood that it was last used as offices by the University of Roehampton and then as a film set. The building is Grade I listed.
- The Temple in the Grounds of Mount Clare: A folly building that is a Grade II* listed temple with external and internal decorative features. The building was built between 1762 and 1769 and is currently on Historic England's 'At Risk' register, as it has been subject to graffiti and other forms of vandalism.
- Picasso House/Hall: A two-storey 1960s building with a basement, which was built in the 1960's and was originally designed to accommodate a dining hall with ancillary facilities at ground floor level, with 28 residential rooms at first floor level. Land Registry records indicate that a branch of the Citizens Advice Bureau has been operating at Picasso House since 2019. Substantial areas of Picasso House have also been in use as storage by the University of Roehampton.
- Blocks A-E: Fifteen almost identical student blocks, which were built in the 1960s, that are clustered into five groups of three. The buildings are two-storey in height and contain twelve student bedrooms, with one shared kitchen and two shared bathrooms each. The blocks therefore accommodate 180 bedrooms and are named individually, in clusters A to E (Albers, Andre, Appell, Balla, Bellini, Blake, Calder, Catlin, Cornell, Dali, Degas, Duffy, Eakins, Epstein and Etty). The last known use of these buildings is as student accommodation.
- The Lodge (Bungalow): A brick building, which sits adjacent to the Temple, that was used as a house for the principal of Garnett College. The building is in derelict condition and is inaccessible. It is not known when it was last used. In light of additional plans received from the applicant on 08/10/2025 and clarification received on 21/10/2025,

the Local Planning Authority is considering its position with regards to whether any suitable use of this building would require demolition and replacement, by reason of its current dilapidated condition.

- The 'Garage': A small building, adjacent to the Lodge, which was originally built as garages to the principal's house. The building is also in a state of disrepair and its last use is not known.
- The 'Outbuilding': A small building with one open side located adjacent to the Garage. The building is also in a state of disrepair.

- 2.3. A description of the Appeal Site and its surrounding is included within the officer's delegated report and the SoCG. In its evidence, the Local Planning Authority will also describe the characteristics of the Appeal Site and its surroundings, including the relationship between the Mount Clare campus and the Downshire House site.

3. Planning History

- 3.1. The recent planning history for the Appeal Site is summarised below:

26th June 2018 (2018/2260): Erection of 3m high mesh fence around the Mount Clare Temple and the erection of 1.8m high timber fence around other derelict structures on site.

Approved.

21st June 2021 (2021/1652): Retention of a fence (3m) around the Mount Clare Temple and the retention of a fence (1.8m) around other derelict structures on site.

Approved.

26th September 2024 (2024/0183): 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). (See associated listed building consent application ref. 2024/0199).

Refused.

26th September 2024 (2024/0199): Listed building consent application for minor enabling works.

Approved.

22nd October 2024 (2024/2089): Certificate of lawfulness application for use as temporary housing (Use Class sui generis).

Refused.

11th July 2025 (2024/2089) (APP/H5960/X/25/3358768): Certificate of lawfulness application for use as temporary housing (Use Class sui generis).

4. Relevant policies and guidance

4.1. The Local Planning Authority will refer to relevant planning policy and guidance when presenting its evidence to the Inquiry. The Local Development Plan comprises:

- The London Plan (March 2021).
- The Wandsworth Local Plan (July 2023).

4.2. Significant weight has been given to the National Planning Policy Framework (December 2024) and the National Planning Practice Guidance.

4.3. The following policies in the London Plan (2021) are relevant to the determination of the appeal:

- GG1 (Building strong and inclusive communities)
- GG2 (Making the best use of land)
- GG3 (Creating a healthy city)
- GG4 (Delivering the homes Londoners need)
- GG6 (Increasing efficiency and resilience)
- D3 (Optimising site capacity through the design-led approach)
- D4 (Delivering good design)
- D5 (Inclusive design)
- D6 (High quality and standards)
- D7 (Accessible housing)
- D8 (Public realm)
- D11 (Safety, security and resilience to emergency)
- D12 (Fire safety)
- D14 (Noise)
- H4 (Delivering affordable housing)
- H5 (Threshold approach to applications)
- H12 (Supported and specialised accommodation)
- H15 (Purpose built student accommodation)
- H16 (Large Scale Purpose Built Shared Living)
- S1 (Developing London's social infrastructure)
- HC1 (Heritage conservation and growth)
- G2 (Making the best use of land)
- G4 (Open space)
- G5 (Urban greening)
- G6 (Biodiversity and access to nature)
- G7 (Trees and woodland)

- H1 (Increasing Housing Supply)
- SI2 (Minimising greenhouse gas emissions)
- SI7 (Reducing waste and supporting the circular economy)
- SI8 (Waste capacity and net waste self-sufficiency)
- SI12 (Flood risk management)
- SI13 (Sustainable drainage)
- T2 (Healthy Streets)
- T3 (Transport capacity, connectivity and safeguarding)
- T4 (Assessing and mitigating transport impacts)
- T5 (Cycling)
- T6 (Car parking)
- T7 (Deliveries, servicing and construction)

4.4. The following Mayor of London's Supplementary Planning Guidance (SPGs and LPGs) are relevant to the determination of the appeal:

- Affordable Housing and Viability SPG 'Be Seen' Energy Monitoring Guidance LPG (September 2021)
- Air Quality Neutral LPG (February 2023)
- Character and Context (2014)
- Circular Economy Statements LPG (March 2022)
- Fire Safety Draft LPG (Consultation draft, February 2022)
- Optimising site capacity: A design-led approach LPG (Consultation draft, February 2022)
- Purpose-built Student Accommodation (Consultation draft, October 2023)
- Sustainable Design and Construction (2014)
- Sustainable Transport, Walking and Cycling LPG (November 2022)
- Social Infrastructure (2015)
- Urban Greening Factor LPG (February 2023)
- Whole Life-Cycle Carbon Assessments LPG (March 2022)

4.5. The following policies in the Wandsworth Local Plan (2023) are relevant to the determination of the appeal:

- SDS1 (Spatial Development Strategy 2023 – 2038)
- PM1 (Area Strategy and Site Allocations Compliance)
- PM7 (Roehampton and Alton Estate Regeneration Area)
- LP1 (The design-led approach)
- LP2 (General development principles)
- LP3 (Historic environment)
- LP10 (Responding to the climate crisis)
- LP13 (Circular economy, recycling and waste management)

- LP14 (Air quality, pollution and managing impacts of development)
- LP15 (Health and wellbeing)
- LP17 (Social and Community Infrastructure)
- LP19 (Play Space)
- LP23 (Affordable Housing)
- LP27 (Housing Standards)
- LP28 (Purpose-Built Student Accommodation)
- LP29 (Housing with Shared Facilities)
- LP31 (Specialist housing for vulnerable people and for older people)
- LP33 (Promoting and protecting offices)
- LP35 (Mixed-use development on economic land)
- LP43 (Out of centre development)
- LP46 (Visitor accommodation)
- LP49 (Sustainable transport)
- LP50 (Transport and development)
- LP51 (Parking, servicing and car free development)
- LP53 Protection and enhancement of Green and Blue Infrastructure (Strategic Policy)
- LP54 (Open space, sport and recreation)
- LP55 (Biodiversity)
- LP56 (Tree management and landscaping)
- LP57 (Urban greening factor)
- LP62 (Planning obligations)
- RO2 (Mount Clare, Minstead Gardens, Roehampton)

Local policy and guidance

- Historic Environment (2016)
- Planning Obligations (October 2020)
- Refuse and Recyclables in Developments (February 2014)
- Statement of Community Involvement (February 2019)
- Wandsworth Minimum Amenities Standards for Houses in Multiple Occupation (2020)

Regional policy and guidance

- Air Quality Neutral LPG (February 2023)
- Urban Greening Factor LPG (February 2023)
- Circular Economy Statements LPG (March 2022)
- Sustainable Transport, Walking and Cycling LPG (November 2022)
- Affordable Housing and Viability SPG 'Be Seen' Energy Monitoring Guidance LPG (September 2021)

- Whole Life-Cycle Carbon Assessments LPG (March 2022)
- Fire Safety Draft LPG (Consultation draft, February 2022)
- Optimising site capacity: A design-led approach LPG (Consultation draft, February 2022)
- Purpose-built Student Accommodation (Consultation draft, October 2023)

Local Plan Partial Review

4.6. The Council has submitted amendments to its adopted Local Plan to the Secretary of State for independent examination (as included in the Wandsworth Local Plan Partial Review - Publication (Regulation 19) Consultation): The amendments propose revisions to the following policies:

- LP23: Affordable Housing
- LP24: Housing Mix
- LP28: Purpose-Built Student Accommodation
- LP29: Housing with Shared Facilities
- LP30: Build to Rent
- LP31: Specialist Housing for Vulnerable People and for Older People

4.7. The proposed revisions are material to the assessment of planning applications and enforcement decisions, but in line with Paragraph 49 of the NPPF which states:

“49. Local planning authorities may give weight to relevant policies in emerging plans according to:

- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)”.

4.8. Given the Local Plan partial review Examination in Public is due to be held in November 2025, this would show the plan is at a fairly advanced stage. In relation to LP31, the emerging policy is generally consistent with the adopted Local Plan policy LP31 with only minor changes proposed, and very limited concerns, therefore the weight applied to LP31 in the Council’s opinion would be moderate given the fairly advanced stage of the emerging policy and consistency with the development plan. In relation to emerging policies LP23 and LP29, which would be relevant to this application, there are a number of outstanding objections, and the policies include deviations from the development plan. Therefore, the weight attached to emerging policies LP23 and LP29 would be limited at

present due to their pre-examination stage in the plan preparation process and the need to duly consider unresolved objections.

5. The Council's Case

Lawful Use

- 5.1. At the outset it is necessary to address the lawful use of the Appeal Site. In short, the Council considers, in line with the recent appeal decision of the Planning Inspector that the Claimant has not demonstrated that the lawful use of the Appeal Site is as a 'hostel' which would incorporate its proposed use. Indeed, the Appellant has not demonstrated that the Appeal Site benefits from any lawful use.
- 5.2. A full explanation of the Council's position, which has already been tested in detail through a lengthy inquiry, is set out at Appendix C to this Statement of Case. That case is not repeated here.
- 5.3. The Council considers that the Appellant's continued assertion that the Appeal Site benefits from a lawful 'hostel' use is unreasonable in light of the recent Inspector's decision on this issue. If this issue is to be pursued at this inquiry then it will necessarily cause the parties to call additional evidence and for additional inquiry time to be dedicated to the issue. If this is to be the Appellant's approach then the Council intends to pursue costs against the Appellant for seeking to re-run a case which has recently been rejected.

The Council's Case

- 5.4. The Council considers that had it determined the appeal it would have refused the proposal for the following reasons:

"REASONS FOR REFUSAL

1. *The development does not meet the requirements of Local Plan Site Allocation (RO2) which is for "mixed-use development with residential uses" across the entire site. The development would fail to optimize the capacity of the site to maximise housing delivery (including affordable housing). The proposed development would be for an over-concentration of single person households and transient population which would not deliver a mixed and sustainable form of development. As such, the development would not deliver the most appropriate form of land use for the site and would not consider design-led solutions that responds to the capacity of the site. The development is therefore contrary to policies RO2, LP24, LP29 and LP31 of the Local Plan (2023) and policies D3, GG4 and H10 of the London Plan (2021).*
2. *The Council accepts that the facility no longer caters for current or future needs for student accommodation if this forms part of the lawful use of the site. However, contrary to LP28 the proposal fails to meet other Local Plan Housing requirements. The proposed use of the site to provide temporary accommodation would not meet*

the requirements of Local Plan policy LP31 (2023) in terms of meeting an identified need, considering the quality of accommodation being proposed and the poor level of public accessibility, with limited access to public transport, shops, services and leisure facilities to cater to intended occupiers, as well as failing to provide affordable housing. Further, it would not meet the requirements of LP29 (Housing with Shared Facilities) due to the over-concentration of HMOs and single-person accommodation, the lack of good levels of public transport and to shops and services appropriate to the needs of the intended occupiers and the failure to provide good quality accommodation. It is therefore considered that the principle of development would fail to meet the requirements of policies LP29 and LP31 of the Local Plan (2023).

- 3. The proposed temporary form of accommodation would fail to provide adequate standards of accommodation in terms of size, layout, design and accessibility to individual rooms and internal communal amenity spaces. As such, the development would result in a cramped form of temporary accommodation that would also fail to consider appropriate inclusive design guidelines and minimum spatial requirements, as it would not provide adequate provision of wheelchair accessible rooms and internal amenities for future temporary residents. As such, the development would not be consistent with policies D4, D5, D6, D7 and H12 of the London Plan (2021) and policies LP27, LP29 and LP31 of the Local Plan (2023).*
- 4. The proposed development fails to consider appropriate sustainability measures to secure CO₂ reduction targets and includes no details of the working condition and fabric of the existing buildings to assess energy reductions measures to adapt or modify ventilation and deliver carbon savings by improving the efficiency of the existing buildings. As such, the development would fail to achieve the maximum feasible reductions in carbon emissions while protecting the heritage and character of the buildings. The development is therefore not consistent with policy SI2 of the London Plan (2021) and policy LP10 of the Local Plan (2023) and would not constitute a sustainable form of development.*
- 5. The proposed development fails to address the requirements for affordable housing and given that a viability assessment has not been submitted to support the application, it has not been demonstrated that it would not be viable to secure an affordable housing contribution as part of the scheme. As such, the development would be contrary to the requirements of policies H4 and H5 of the London Plan and policy LP23 of the Local Plan (2023) as well as the explicit affordable housing requirements which are part of LP29 and LP31.*
- 6. The Application has failed to provide sufficient information to properly assess the impact of the proposal upon relevant heritage assets, which include Mount Clare House, the Doric Temple, the Registered Park and Garden and the Conservation Area. The Application has not considered the future role of the Doric Temple in terms of its long-term management and maintenance, nor the potential for the re-instatement of the pond in front of the Temple. Further, there is a clear risk to Mount Clare House and the Doric Temple of further degradation/deterioration without any proposals for their proper management and protection. The proposed development has not demonstrated that it meets the requirements set out in the Local Plan (2023) site allocation RO2 (Mount Clare, Minstead Gardens, Roehampton, SW15), policies D3 and HC1 of the London Plan (2021) and Local Plan policy LP3. The application has also failed to demonstrate how it would comply with s66(1) and 72(1) Planning (Listed Building and Conservation Areas) Act 1990.*
- 7. In the absence of a completed Section 106 planning obligation, the proposed development fails to mitigate against the adverse impact it will have on sustainability*

and local infrastructure due to absence of travel plan monitoring, carbon offsetting contribution and provision of affordable housing. Failure to secure such mitigation is therefore contrary to policies LP10, LP23, LP29 and LP62 of the Local Plan (2023), policies SI2, GG4, H4 and H16 of the London Plan (2021) and the Planning Obligations SPD (October 2020).

Overall, the proposal is considered to conflict with the following policies of the development plan, LP3, LP10, LP23, LP24, LP27, LP29, LP31, LP62 and RO2 of the Local Plan (2023) and policies D3, GG4, HC1, H4, H5, H10, H12, H16 and D4, D5, D6, D7 and SI2 of the London Plan (2021) and material considerations do not indicate that a decision should be taken contrary to the development plan in this case.

- 5.5. The detailed reasoning behind the Council's reasons for refusal and its position is set out in the appended officer's report (Appendix A) and is not repeated here.

Response to the Appellant's Statement of Case

- 5.6. The Appellant's statement of case has addressed the following issues:

- Issue 1 – Description of the Application
- Issue 2 – Principle of Development
- Issue 3 – Lawful Use
- Issue 4 – Quality of Accommodation
- Issue 5 – Transport and Servicing
- Issue 6 – Landscaping
- Issue 7 – Employment Strategy and Operational Statement
- Issue 8 – Fire Safety
- Issue 9 – Energy and Sustainability

- 5.7. The reasons for refusal also concern heritage impact and the failure to provide affordable housing. Those issues are therefore addressed additionally below in so far as they respond to the case of the Appellant. Again, matters addressed in the officer's report are not repeated here unnecessarily.

Issue 1 – Description of the Application:

- 5.8. The Appellant states that the description of the development as submitted for the “*use of the existing buildings for temporary accommodation with associated landscaping*” is satisfactory and fails to acknowledge that the proposal would require a change of use and would also involve operational development. The LPA therefore sets out its position with regards to this issue as follows:
- 5.9. *Certificate* of lawfulness application for use as temporary housing (Use Class Sui generis) was refused and dismissed by appeal reference APP/H5960/X/25/3358768. The appeal decision relates to the existing use of the Appeal Site and considers that the

use of a hostel for temporary accommodation would result in a material change of use of the Appeal Site that requires planning permission. Appended to this Statement of Case is the Council's assessment of the lawful use of the Appeal Site which draws heavily upon the evidence which has already been examined and tested at appeal. In short, there is simply no legal basis for the Appellant's assertion that the Appeal Site benefits from a lawful use as a hostel and that therefore its proposed use does not amount to a material change of use. Further, the Appellant has not demonstrated that there is any extant lawful use at the Appeal Site. Therefore, the description of development should refer to the application being for a material change of use.

- 5.10. In addition, the Appellant's suggested description of development fails to acknowledge any operational development that would result from the proposed development. The development is likely to require the rebuilding/replacement of the bungalow building on the Appeal Site. The Appellant submitted additional documents to PINS on the 9th October 2025, which include three plans and elevations for the rebuilding/replacement of the existing derelict bungalow building, which is in a state of disrepair, and which it is the LPA's view is unlikely to be brought back into operational use unless it is entirely rebuilt/replaced. The plans demonstrate that there is likely would be substantial operational development as part of the proposal, requiring planning permission
- 5.11. The LPA considers that the description of the development should therefore reflect the operational form of development. Under these terms, the LPA maintains that the description of the development should read as follows:

"Change of use of Picasso, Albers, Andre, Appell, Balla, Bellini, Blake, Cornell, Catlin, Calder, Dali, Degas, Duffy, Eakins, Epstein and Etty Houses alongside the replacement of the former Lodge building to provide for temporary accommodation for the homeless to accommodate 264 rooms with communal facilities and provision of ancillary refuse/cycle stores, landscaping, play space and associated works".

- 5.12. The Appellant was advised in writing, during the validation process of planning application 2025/0074, that the description of the development would be subject to review, to reflect the appeal decision that was subsequently issued on the 11th July 2025. On that basis, the Appellant was advised prior to the appeal being lodged that the description of the development would require amendments, by reason that this would constitute a change of use and operational development. As also advised, the updated description would require 21-day statutory re-consultation.

Issue 2 – Principle of Development:

- 5.13. As set out in the officer's report, the Council considers that the principle of development is not supported by the Development Plan.

- 5.14. As set out in the officer's report, the proposal conflicts with site allocation RO2 which seeks a mixed-use development with residential uses. It is expected that any proposal which comes forward would address the needs of the entire site including the preservation and enhancement of all of the listed assets (Registered Park and Garden, Mount Clare House and the Temple). Further the policy expressly requires that proposals must consider the future of the Temple and secure its management and maintenance.
- 5.15. Further, although the Local Planning Authority does not dispute the Appellant's statement that there is a need for the accommodation being proposed and has given significant weight to the meeting of some of this need, the LPA seeks for all forms of development to make the best use of land, in line with a design-led approach that optimises the capacity of sites, including site allocations, in accordance also with policy D3 of the London Plan (2021). By optimising site capacity, the LPA seeks to deliver the most appropriate form and land use for a site, considering a design-led approach that takes into account suitable design solutions to determine the most appropriate form of development that responds to the site's capacity for good quality residential accommodation and infrastructure capacity. Under these terms, the existing heritage constraints of the site should also be noted, as referred below in 'Issue 10 of this statement of case.
- 5.16. Although the site allocation is flexible in nature and does not specify housing type or quantum of residential units, within the NPPF there remains an aspiration to increase housing supply and encourage sustainable growth.
- 5.17. The proposed type of temporary accommodation across a number of the blocks does correspond with the Large-Scale Purpose-Built Shared Living LPG (LSPBSL), in line with London Plan policy H16 (2021) and Local Plan policy LP29 (2023) and therefore the quantum is assessed subject to a ratio of 1.8:1 (as per London Plan, paragraph 4.1.9). Based on these calculations, the development would provide a net gain of 41 dwellings of which the majority of the floorspace is delivered as residential space, and as mostly single person dwellings. Based on the proposal it does not appear to meet the aspirations of RO2 which envisages the re-development of the entire site including a sensitive and comprehensive consideration of the site including all listed assets, with only a limited increase in the quantum of dwellings on the site in comparison to the significant wider impacts on the heritage assets, which are set out further within the officer report.
- 5.18. Further, and as is set out in more detail in the officer's report, it is considered that the concentrated provision of single-person accommodation will not meet relevant policy objectives of achieving mixed and balanced communities which is set out in both the Local Plan and the London Plan.

- 5.19. With regards to policy LP28, the Appellant states in its statement of case dated August 2025 that any loss of student accommodation should not be resisted, by reason that the need for student accommodation at the Appeal Site is limited. This position is supported by a letter from the University of Roehampton dated 21st August 2025 and a letter from Sring4 dated 22nd July 2025, which advise that there is a lack of need for student accommodation. The Appellant also makes reference to letters from Kingston University and St Mary's University however correspondence from these universities has not been provided.
- 5.20. The Council considers that there is no substantive evidence that the Appeal Site is required for student housing and therefore agrees with the Appellant on this point. However, it is noted that policy LP28 also requires compliance with other housing policies in the local plan. The Council considers that other policies are not complied with and therefore, to this extent, there is also a breach of LP28.
- 5.21. The Appellant addresses policy LP31 of the Local Plan (2023). This requires development proposals for 'Specialist Housing and Vulnerable People to demonstrate that the accommodation meets an identified need'. The LPA does not deny the high level of need for urgent accommodation in the borough and gives significant weight to this factor. However, the other policy tests also need to be met. The Local Planning Authority is committed to providing housing for vulnerable households that is fit for purpose and provides a safe, attractive environment that meets appropriate standards.
- 5.22. Policy LP31 of the Local Plan (2023) requires that accommodation is of a high quality and meets relevant best practice guidance for this type of accommodation. As set out in the officer's report, there is a breach of this policy requirement. The proposal does not meet relevant space standards. The rooms are cramped with limited shared facilities. This is unacceptable given the potential for individuals and families to be housed in this accommodation for months or even more than a year.
- 5.23. Policy LP31 further requires accommodation to have access to good levels of public transport, and to shops, services and leisure facilities appropriate to the needs of the intended occupiers. As set out in the officer's report this is not the case in relation to the Appeal Site which is proposed to house a significant number of vulnerable people.
- 5.24. Finally, Policy LP31 requires affordable housing to be provided. As set out in the officer's report, there is also a breach of this criterion.
- 5.25. With regards to provision of temporary accommodation with shared facilities, policy LP29 of the Local Plan (2023) is relevant. This resists housing with shared facilities unless specific circumstances are met. Policy LP29 – Parts A, C and D, state that:

"A. Development proposals for new Houses in Multiple Occupation (HMOs) will be supported where they:

1. Do not result in the loss of housing suitable for occupation by families as defined in Part A of Local Plan Policy LP26 (Conversions);
2. Do not result in an overconcentration of HMOs and other single-person accommodation at the neighbourhood level;
3. Do not give rise to adverse impacts on the amenity of the surrounding properties and the character or the neighbourhood, including as a result of cumulative impacts;
4. Have access to good levels of public transport (PTAL 4 or higher), and to shops and services appropriate to the needs of the intended occupiers; and
5. Provide a good quality of accommodation, in line with Policy LP27 (Housing Standards)."

"C. Development proposals for large-scale purpose-built shared living accommodation which is defined as being a 'sui generis' use will generally be resisted. Such accommodation will only be permitted where:

1. It is proposed on a site which is not suitable for conventional housing;
2. It is clearly demonstrated that large-scale purpose-built shared living accommodation is better suited to meet the local housing needs than conventional housing; and,
3. It would not lead to an over concentration of single-person accommodation at the neighbourhood level."

"D. Where the principle of large-scale purpose-built shared living accommodation, is accepted in line with Part C, proposals must:

1. Meet criteria A1 – A10 of London Plan Policy H16 (2021);
2. Demonstrate through the submission of a management plan that the development will be managed and maintained over its lifetime so as to ensure an acceptable level of amenity and access to facilities for its occupiers and would not give rise to unacceptable impacts on the amenities of existing residents in the neighbourhood; and,
3. Provide a financial contribution towards the provision of affordable housing in the borough, in accordance with the London Plan (2021)."

- 5.26. The Local Planning Authority considers that the application fails to meet the above policy requirements, by reason that the proposal would result in an over-concentration of single-person accommodation, by reason of the low transport accessibility of the Appeal Site, by reason of the failure to provide a financial contribution towards the provision of affordable housing, by reason of a failure to provide good quality accommodation and by reason of the failure to provide a comprehensive management plan. Further, with regards to criteria A10-A10 of H16 of the London Plan it is not considered that the proposal: is of good quality and design; would contribute to mixed and inclusive neighbourhoods; is located in an area well-connected to local services and employment by walking, cycling and public transport; provides sufficient communal facilities in line with that policy; provides adequate functional living space and layout; provides a management plan; or provides cash in lieu of affordable housing.

- 5.27. In addition, due to the absence of provision of affordable housing and a management plan for the proposed temporary accommodation, the proposal is not consistent with policy LP29 of the Local Plan (2023). Given that the Appeal Site is allocated for residential uses and is surrounded by existing conventional housing, it is clear that the Appeal Site would be appropriate for conventional housing. The development would result in an over-concentration of single person households in that over 80% of the rooms are for single people, which would be a considerable proportion of the households across the Appeal Site.
- 5.28. Additionally, the proposed temporary accommodation would be largely conceived for a largely transient population that would fail to support the aspirations within the Local Plan (2023) and London Plan, to deliver mixed and sustainable communities. These concerns are raised further in policy LP29 of the Local Plan (2023), which states how *“shared living accommodation which is defined as ‘sui generis’ use does not provide an alternative route to affordable housing to people on lower quartile incomes”*. The policy adds how the temporary shared living accommodation is unlikely *“to be a sustainable model of development in the long term, especially for a range of household types such as families, and hence could lead to land in Wandsworth being used ineffectively”*.
- 5.29. Overall, the Local Planning Authority considers that the proposed development is unacceptable in principle and it contravenes a number of different policies of both the London and Local Plans.
- 5.30. With regards to affordable housing, the Appellant’s statement of case omits the requirements of policy H4 and H5 of the London Plan (2021). The proposed development includes a form of housing based on the definitions within the Housing Act 2004, and would most closely align with Large Scale Purpose Built Shared Living Accommodation (LSPBSL) whilst including 1 x 6 bed dwelling, a 7 x 3 bed dwellings and 4 x 2 bed dwellings on the Appeal Site that can be assumed to be used as House of Multiple Occupation.
- 5.31. The application omits an Affordable Housing Statement to ascertain if the maximum level of affordable housing contributions could be delivered. The failure to provide an affordable housing contribution or demonstrate why one is not required is an additional reason for refusal.

Issue 3 – Lawful Use:

- 5.32. The Appellant addresses what it says is the lawful use of the Appeal Site in various places throughout its appeal statement. As already set out above, the Council’s position is set out at Appendix C to this Statement of Case. However, the following additional comments are made in response to the Appellant’s statement of case.

- 5.33. At para 2.11 the Appellant states that the ‘Inspector found the lawful use of Mount Clare was as student accommodation’. That is incorrect, the Inspector made no finding as to whether the site benefited from a lawful use or not. The Inspector did find that any historic planning permission would have been for student accommodation and not a hostel use. In any event, the Inspector found that there had been a material change of use away from the historically permitted use.
- 5.34. At paragraph 2.12 the Appellant refers to what it says is a deemed permission for the Alton Estate and highlights the lack of conditions. This makes no difference to the lawful use of the Appeal Site. It has missed the point. The clear finding of the Inspector (in agreement with the Council) was that permission would have been for student accommodation. In such circumstances it is immaterial what the conditions do or do not say so.
- 5.35. It is correct that the certificate of lawfulness appeal decision is under challenge. However, the Council considers that the challenge will not succeed and in any event the decision in the certificate of lawfulness appeal is lawful unless it is quashed.
- 5.36. The Appellant states in paragraph 4.30 of its statement of case that “*despite the findings of the appeal decision ref. 33588768, the Appellant remains of the view that the site benefits from an existing broad hostel use. The appeal decision is currently under challenge.*” As set out above and in Appendix C, the LPA considers that the Appellant has not established that the Appeal Site benefits from a lawful use, let alone a lawful use which would cover temporary accommodation for the homeless.
- 5.37. As explained in Appendix C, the Appellant’s further evidence with regards to what it says is the deemed permission for the Alton Estate does not change this. Nor does the additional letter from the University of Roehampton.

Issue 4 – Quality of Accommodation:

- 5.38. The Appellant states in paragraph 4.44 of the lodged statement of case that “*the layout and provision is appropriate and well in excess of minimum standards*”. The statement of case adds at paragraph 4.6 that the “*ground floor will provide a series of dedicated wheelchair accessible units, with level thresholds and level access throughout*”. The LPA strongly disagrees with the Appellant’s statements. The accommodation provided includes elements that align with HMO accommodation, individual dwellings (within Picasso House and Bungalow) and Purpose-Built Shared Living Accommodation as per the provided floorplans and layouts. Based on these points which are set out further within the Officer Report the LPA considers that the proposed temporary accommodation under Sui Generis use class should be assessed as a ‘hostel type HMO’ or a ‘bedsit type HMO’ and therefore should comply with the Wandsworth Minimum Amenities Standards for HMO. Even if the proposed use does not meet the HMO definition, the standard of accommodation is a material consideration and similar

requirements should be applicable, considering that the proposed units would contain shared facilities.

- 5.39. In relation to the dwellings within Picasso House, these are considered as individual dwellings, which is how they are laid out as part of the plans. Local Plan policy LP27 requires housing to be delivered in line with nationally prescribed space standards, and 7 of the dwellings in Picasso House are below minimum space standards, with 3 of these being over 20sqm below minimum space standards. This would not align with policy requirements. The LPA therefore disagrees with the Appellant's assertion that the units are well in excess of minimum standards or that on the basis of the above points, and that HMO standards should not be considered when examining the quality of the proposed temporary accommodation.
- 5.40. Further, even if the standards of 'Setting the Standard', which is London's centralised temporary accommodation inspection service, apply, and which the Council understands that the Appellant to be relying upon, then it is clear that the proposals do not meet these standards for the reasons set out in the officer's report.
- 5.41. In addition, the submitted floorplans show that some of the proposed rooms would contain private kitchenettes and bathrooms and would therefore fall under the definition of self-contained accommodation, within Section 254 of the Housing Act 2004. On this basis, the proposed accommodation also closely aligns with the large-scale purpose built shared living accommodation, which would require the proposal to be consistent with the requirements of London Plan policy H16 (2021), that requires sufficient communal facilities and services that meet the needs of intended number of residents and access to communal kitchens, laundry facilities and internal communal amenity spaces. This type of accommodation does not include minimum standards as referred to within the London Plan: "*4.16.6 The private units should be appropriately sized to be comfortable and functional for a tenant's needs and may include facilities such as en-suite bathrooms and limited cooking facilities. There are currently no minimum space standards for communal and private areas of this type of accommodation*". However, there are requirements in policy which are referred to below.
- 5.42. The proposed temporary accommodation fails to meet the minimum requirements as out in London Plan policy H16 (2021), by reason that the communal kitchen and communal amenity spaces would only be in Picasso House and would therefore restrict direct access to residents within the other blocks.
- 5.43. The submitted floorplans have been reviewed in detail and the LPA questions how the proposed rooms have been considered, as several rooms also share bathroom facilities, which adjoin off bedrooms. In addition, if the rooms were considered individually, these would fail to meet the requirements of the large-scale purpose-built shared living guidance or Wandsworth Minimum Amenities Standards for HMO, which states that any form of accommodation with shared facilities should have convenient access to

communal facilities, including washing and cooking, which are not provided in the submitted floorplans.

- 5.44. For example, the Council's mandatory HMO requirements state that all washing facilities must be *"suitably located in or in relation to the living accommodation, not more than one floor distant from the occupancy rooms"*. The proposed layout would fail to meet these requirements, and the LPA questions what guidance and minimum standards have been considered for the proposed layout, communal facilities and shared amenity spaces. Given the limited floor area for some single rooms and considering that no shower facilities are included in some ensuite rooms, the LPA considers that the proposed living environment is not acceptable. These concerns were relayed to the Appellant prior the appeal was lodged but no revisions to address these issues were submitted by the Appellant.
- 5.45. The Appellant states that the Appeal Development would provide a series of dedicated wheelchair accessible rooms. However, these details are not shown in the submitted plans, as only one single room at ground floor in Picasso House is labelled as 'wheelchair accessible'. This room would contain 9.00 sqm in floor area. In the absence of any other details for wheelchair accessible rooms, the development would not incorporate acceptable inclusive design principles and would also be contrary to policy D7 of the London Plan (2023).
- 5.46. Given the inadequate provision of internal amenity spaces for each block, absence of servicing facilities for washing, cramped size of some single bedrooms and bathrooms, absence of inclusive design guidelines and overall poor layout and inadequate quantum of communal facilities, the LPA strongly contests the Appellant's assertion in paragraph 4.49 of the statement of case, that the *"accommodation available is considered to be of an appropriately high quality to meet relevant best practice guidance for this type of accommodation"* and maintains that the proposed standard of accommodation is unacceptable and contrary to the policy requirements and standards set out in this statement of case.

Issue 5 – Transport and Servicing:

- 5.47. The LPA considers that there are no transport grounds for refusing the application and agrees in principle that the uplift of cycle parking is supported. In addition, the LPA considers that it is unlikely that the proposed development would create a severe impact on the transport network around the site.
- 5.48. However, the submitted floor plans conflict with the submitted Transport Statement with regards to quantum of cycle parking, and the proposed stepped structure at the east of Picasso House appears to overrun the highway boundary. The submitted plans and specifications should be revised and pre-commencement and pre-occupation conditions requiring details of cycle parking, delivery and servicing, management of vehicular

parking, travel plan and construction management plans are recommended, in the event that the appeal is not dismissed by the planning inspector.

- 5.49. Notwithstanding the inconsistencies between the submitted documents, the LPA raises no fundamental concerns with regards to transport and servicing and therefore this consideration would not warrant a reason for refusal of the planning application.

Issue 6 – Landscaping:

- 5.50. As set out below, the Council has concerns with regards to landscaping from a heritage perspective. The Appellant considers that if further landscaping improvements should be sought, these should be subject to a condition that enhances the landscaping strategy further. Notwithstanding this, LPA has raised concerns over how the limited details with regards to the landscaping strategy could result in a harmful impact on the heritage assets within the Appeal Site, this is particularly related to the provision of cycle stands.
- 5.51. In addition, the application provides no details to support the proposed play space, with regards to play equipment or expected population of children that would use the play space.

Issue 7 – Employment Strategy and Operational Statement:

- 5.52. The Appellant considers that a detailed management plan can be secured by condition, to justify the proposed staffing levels, maintenance and security measures for the Appeal Site. However, the LPA raises strong concerns over how the development would only require five operational jobs for the operation of the Appeal Site, which would accommodate 264 rooms.
- 5.53. The proposal involves the accommodation of mainly single person rooms. As stated above (paragraph 5.26 of this statement of case), it is the LPA's view that the layout and management of the temporary accommodation should be consistent with the requirements of policy H16 of the London Plan (2021), which requires the provision of a management plan for such form of accommodation. The LPA considers that the omission of such information reflects the poor standard of accommodation being proposed, as insufficient details with regards to security, maintenance, and management of the Appeal Site have been made available by the Appellant.

Issue 8 – Fire Safety:

- 5.54. A fire strategy has not been submitted with the application, in accordance with Policy D12 of the London Plan (2021). However, the LPA accepts that a detailed fire strategy, that includes security measures such as evacuation routes, fire safety systems, fire spread prevention measures and accessibility for firefighting vehicles can be secured by

condition in the event that the appeal was not dismissed by the planning inspector. The failure to submit details to minimise the risk of fire would therefore not warrant a refusal and the LPA agrees that this requirement could be met at condition stage.

Issue 9 – Energy and Sustainability:

- 5.55. The Appellant's statement of case states that *"the Appellants recognise that more detail on energy/sustainability is sought but are confident that the site can achieve the necessary carbon reduction target through retrofitting and renewable technologies without undue difficulty, and a condition could secure these details appropriately"*. The LPA strongly contests this position and considers that the planning application fails to demonstrate how the zero-carbon target would be met within the framework of the development proposals, as required by policy SI2 of the London Plan (2021).
- 5.56. Although an energy report was submitted to PINS on the 8th October 2025, the LPA has not had the opportunity to consult and verify the content of the energy report in detail. The energy report suggests 28% savings to Part L 2021 Building Regulations and therefore the development would still fail to meet policy requirements with regards to zero carbon. The energy report states that no further savings can be achieved, by reason of the constraints of the Appeal Site and viability considerations. However, no viability report to substantiate this reason has been provided by the Appellant.
- 5.57. As such, any shortfall would need to be verified, and any planning obligation would also need to be secured through a financial contribution for the borough's carbon offset fund. The Appellant's statement advising that the site could achieve the necessary carbon reduction targets therefore needs to be fully evidenced and the LPA considers that the proposal's failure to improve the efficiency and sustainability of the existing buildings should not be accepted or justified and would therefore be contrary to policy SI2 of the London Plan (2021) and LP10 of the Local Plan.

Issue 10 – Impact on Designated Heritage Assets:

- 5.58. The Appeal Site is highly sensitive from a heritage perspective. It is a registered park and garden and contains the Grade I listed Mount Clare and the Grade II* listed Temple. Policy RO2 of the Local Plan (2023) explicitly seeks for any proposal for the site to "consider the future role of the Doric Temple and provide a scheme for its long-term management and maintenance. Of course, the policy itself is directed at the site as a whole and would obviously expect that any development proposal would seek to incorporate and preserve and enhance each of the heritage assets in line with local policies LP3 of the Local Plan (2023) and policies D3 and HC1 of the London Plan (2021) as well as the relevant NPPF policies.
- 5.59. The Council is concerned that the application material has failed to adequately assess the significance of the various heritage assets and the impact of the proposals upon

them. On the information available, the Council considers that the proposals could lead to less than substantial harm to the listed assets at the Appeal and potentially the character and appearance of the Alton Conservation Area.

- 5.60. Although the Grade I Mount Clare building and the Grade II* Temple do not form part of the change of use application, the sensitive location of the development proposals with regards to heritage and conservation should be addressed in detail. The Appellant's statement of case omits this material consideration.
- 5.61. In particular, the application includes no details of maintenance or management for Mount Clare and the Temple for their role for the future as part of the development proposals and therefore concerns are raised over how these heritage assets could be put at risk from decay and neglect. Paragraph 3.14 of the Appellant's Statement of case states that funds generated through the temporary accommodation use will allow for the wider Appeal Site to be more actively managed, kept secure and to avoid further degradation until more permanent and appropriate uses can be found. No detail is provided of this and this does not assuage the Council's concerns. Further, it is entirely unclear what the 'permanent and appropriate uses' are considered to be.
- 5.62. In the absence of any proposals or any form of maintenance plan as part of the application, there is a risk that it could be subject to unauthorised access and vandalism. If these buildings are not to be used, then the security arrangements will need to be agreed. In fact, the Design and Access Statement says that Mount Clare is currently vacant and thus it is assumed that this will remain the case, putting the building at risk from decay and neglect. Security arrangements should be put in place, but no details are provided.
- 5.63. The Council has particular concerns with regards to the rebuilding/replacement of the former Lodge and the landscaping proposals. It is considered that the Appellant's proposal to rebuild/replace the bungalow could harm the significance of the designated heritage assets within the Appeal Site. It is noted that policy RO2 states that *"any replacement of the 1960's 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"*.
- 5.64. The application has not done this. The proposed rebuilding/replacement of the former Lodge could cause less than substantial harm to the Temple in particular and, contrary to policy, the applicant has not taken the opportunity to re-assess the landscape significance of the site. The former building, which is in derelict condition, was built to infill the large pond in front of the temple, harming the connection between Mount Clare and the Temple. There is no good reason why this harm should be continued by a re-development scheme.

- 5.65. If the Lodge is rebuilt/replaced in its current location even to the same size and form as it is likely to have had originally, this would remove the opportunity to reinstate the pond at the Temple which is highlighted as a requirement of site allocation R02 under the Local Plan (2023). It also does not re-assess the landscape significance of the site or seek to inform and re-interpret the principles of the Capability Brown landscape which is a registered park and garden as set out in the site allocation.
- 5.66. Further, although elevations of the rebuilt/replacement lodge have now been provided. It remains the case that the application has not made any assessment of the impact of this on the significance of the designated assets as well as the Conservation Area. Further, required details with regards to materials, associated development and any proposals for the outbuildings remain outstanding. It is also not clear what, if any, works would be carried out to the land surrounding the rebuilt/replacement building, for example, to provide safe access which may cause additional harm to the setting of the Temple.
- 5.67. With regards to landscaping and impact on the historic park and garden and setting of listed buildings, the application includes a Landscape Plan which illustrates a series of Sheffield cycle stands adjacent to each residential block. The cycle stands would require a concrete base, and these could also have a cumulative impact on the historic park and garden and could therefore erode the existing green landscape which extends up to the external walls of the existing fifteen student blocks, resulting in a visual clutter. However, there is insufficient information to ascertain the extent of harm that could take place to the registered park and garden and other assets as the landscape plan is very limited in terms of detail.
- 5.68. The LPA has separately considered the issue of heritage harm in accordance with paragraph 215 NPPF and, in particular, whether the public benefits of the proposal outweigh that harm, however, there is insufficient information to assess the exact level of harm which on heritage assets that is likely to be caused by the proposal and therefore it is not possible to carry out this balance.
- 5.69. The Council considers that the proposal has not demonstrated that it complies with LP3 and RO2 of the Local Plan (2023), D3 and HC1 of the London Plan (2021) and heritage policies in the NPPF. It is further considered that the proposal has not demonstrated how it complies with s66 and s72 Town and Country Planning (Listed Building and Conservation Areas) Act 1990.

Issue 11 – Affordable Housing:

- 5.70. As mentioned above under the 'Principle of Development' the Appellant's statement of case does not mention any potential provision of affordable housing. The proposed temporary accommodation confirms a form of housing and based on the definition within the Housing Act 2004, the development would be closely aligned with Large Scale

Purpose Built Shared Living Accommodation (LSPBSL) (as assessed above in paragraph 5.30). The application fails to consider any provision of affordable housing or the option to offer a Payment in Lieu, which would be required under a viability tested route, as per London Plan policy H16 (2021).

- 5.71. The LPA has a very high level of need for affordable housing, as per the recent Housing Needs Assessment carried out for the Local Plan Partial Review which identifies a need for 17,200 affordable homes over the plan period, equivalent to 1,148 affordable homes per annum), which equates to just under 60% of the Council's annual housing requirement of 1,950 homes per annum. Taking these findings into account, the HNA concludes *"There is an extremely high need for affordable rent housing such as social or affordable rent"*.
- 5.72. The LPA considers that meeting the Borough's long-term need for social rented housing is inextricably linked to ensuring the best life outcomes for the Borough's residents. The absence of any provision of affordable housing therefore reinforces the LPA's concerns over how the proposal fails to constitute the most appropriate use for the site, as it would not be consistent with the wider aspirations in the Local Plan to provide permanent housing that meets the requirements of residents in a way that supports inclusive, cohesive and sustainable communities, as advised in paragraph 5.15. above.

Overall Planning Balance

- 5.73. For the reasons set out in the officer's report, the Council considers that the proposal would not accord with the development plan. The Council has considered whether there are material considerations which indicate that permission should be granted notwithstanding this breach. The Council considers that the proposal would not represent a sustainable form of development. It is accepted that the proposed development seeks to address some of the need for temporary housing, to reuse vacant buildings on the site, and to provide associated economic benefits. However, these benefits are not considered sufficient to warrant a grant of consent.

6. Appellant's purported costs application

- 6.1. Appended to the Appellant's Statement of Case is a costs application. However, the form makes clear that it is in draft and is not final. It states, for example that 'potential costs grounds include' and then sets out some vague assertions.
- 6.2. The Council considers that there is no credible basis for an allegation of unreasonable behaviour against the Council nor that any such behaviour has caused the Appellant to incur wasted costs. The Council will request a full opportunity to respond if any application is actually made.

7. Statement of Common Ground and Conditions

- 7.1. The Local Planning Authority will work with the Appellant to narrow issues in dispute as far as possible through a Statement of Common Ground.
- 7.2. A schedule of draft planning conditions is added as Appendix B to this Statement of Case. The LPA will seek to agree these conditions with the Appellant. As further details become available the LPA reserves the right to make submissions as to additional conditions which may be required.

8. Section 106 Planning Obligation

- 8.1. The Local Planning Authority has not agreed Heads of Terms with the Appellant. In the event that the appeal is not dismissed, the LPA considers that planning contributions towards affordable housing, carbon offset contributions, travel plan monitoring and administrative costs should be secured. Please see the relevant reason for refusal.

9. Documents

- 9.1. The Local Planning Authority's Statement of Case and appendices will be made available on the Council's website at:
http://www.wandsworth.gov.uk/info/1004/planning_policy
- 9.2. The documents will also be made available to view in the Council's offices at Wandsworth Town Hall, Wandsworth High Street, London, SW18 2PU by prior appointment by emailing planning@wandsworth.gov.uk or by telephoning 020 8871 7620.