

## The Planning Inspectorate

### PLANNING APPEAL FORM (Online Version)

**WARNING:** The appeal **and** essential supporting documents **must** reach the Inspectorate within the appeal period. **If your appeal and essential supporting documents are not received in time, we will not accept the appeal.**

**Appeal Reference: APP/H5960/W/25/3371729**

#### A. APPELLANT DETAILS

*The name of the person(s) making the appeal must appear as an applicant on the planning application form.*

Name

Company/Group Name

Address

Preferred contact method

Email ☒ Post ☐

#### B. AGENT DETAILS

Do you have an Agent acting on your behalf? Yes ☒ No ☐

Name

Company/Group Name

Address

Phone number

Email

Your reference

Preferred contact method

Email ☒ Post ☐

#### C. LOCAL PLANNING AUTHORITY (LPA) DETAILS

Name of the Local Planning Authority

LPA reference number

Date of the application

10/01/2025

Did the LPA validate and register your application?

Yes



No



Did the LPA issue a decision?

Yes



No



#### D. APPEAL SITE ADDRESS

Is the address of the affected land the same as the appellant's address?

Yes



No



Does the appeal relate to an existing property?

Yes



No



Address

Mount Clare Campus  
Minstead Gardens  
Roehampton Gate  
SW15 4EE

Is the appeal site within a Green Belt?

Yes



No



Are there any health and safety issues at, or near, the site which the Inspector would need to take into account when visiting the site?

Yes



No



#### E. DESCRIPTION OF THE DEVELOPMENT

Has the description of the development changed from that stated on the application form?

Yes



No



If YES, please state below the revised wording

Use as hostel accommodation (Sui generis) with associated landscaping and cycle parking

Please attach a copy of the LPA's agreement to the change.

☒ see 'Appeal Documents' section

Area (in hectares) of the whole appeal site [e.g. 1234.56]

1.57 hectare(s)

Area of floor space of proposed development (in square metres)

6220 sq metre(s)

Does the proposal include demolition of non-listed buildings within a conservation area?

Yes



No



#### F. REASON FOR THE APPEAL

**The reason for the appeal is that the LPA has:**

1. Refused planning permission for the development. ☐
2. Refused permission to vary or remove a condition(s). ☐
3. Refused prior approval of permitted development rights. ☐
4. Granted planning permission for the development subject to conditions to which you object. ☐
5. Refused approval of the matters reserved under an outline planning permission. ☐
6. Granted approval of the matters reserved under an outline planning permission subject to conditions to which you object. ☐
7. Refused to approve any matter required by a condition on a previous planning permission (other than those specified above). ☐

8. Failed to give notice of its decision within the appropriate period (usually 8 weeks) on an application for permission or approval. ☒
9. Failed to give notice of its decision within the appropriate period because of a dispute over provision of local list documentation. ☐

## G. CHOICE OF PROCEDURE

There are three different procedures that the appeal could follow. Please select one.

1. Written Representations ☐
2. Hearing ☐
3. Inquiry ☒

You must give detailed reasons below or in a separate document why you think an inquiry is necessary. The reasons are set out in

☒ the box below

1. Disputed Lawful Use - A central dispute is the lawful planning use of the site (student hostel vs. mixed-use vs. temporary accommodation). This involves complex questions of law, interpretation of historic consents, and the weight of evidence (including a previous appeal decision currently under legal challenge). Such issues require detailed oral evidence from planning and legal experts, and cross-examination.
2. Policy Interpretation and Strategic Implications - The Council relies on London Plan Policy H15 and Local Plan Policy LP28 regarding student accommodation. The Appellant contests that the policies are being misapplied given documented oversupply and lack of demand. These are not straightforward factual matters.
3. Housing Need - The Appellant has supplied evidence (including letters from the University of Roehampton and Spring4) showing no demand for student accommodation. The Council maintains there is a continuing policy presumption to resist loss of student housing. An inquiry will allow testing of this evidence through expert witnesses.
4. Transport, Accessibility and PTAL Disputes - The Council argues that the site's low PTAL rating (1b) renders it unsuitable for the proposed use. The Appellant disputes this, citing transport and accessibility studies (Mode / Velocity) submitted with the application/appeal. These technical transport matters involve modelling and expert assessment, are better explored through cross-examination.
5. Scale and Significance  
The scheme involves 207 units / 264 bedrooms, which is major development in a sensitive location (Alton Conservation Area, adjacent to Richmond Park, including two listed buildings). Given the heritage, housing, and social policy implications, this case is of sufficient complexity and significance to warrant an inquiry.

(a) How many witnesses do you intend to call?

4

(b) How long do they need to give their evidence?

Likely 3 days, subject to LPA response to the appeal. The appeal is lodged against non-determination, so it is not entirely clear which issues will remain at the formal Inquiry stage.

(c) How long do you estimate the inquiry will last?

5 day(s)

## H. FULL STATEMENT OF CASE

☒ see 'Appeal Documents' section

Do you have a separate list of appendices to accompany your full statement of case? Yes ☒ No ☐

☒ see 'Appeal Documents' section

(a) Do you intend to submit a planning obligation (a section 106 agreement or a unilateral undertaking) with this appeal? (Please attach draft version if available) Yes ☐ No ☒

(b) Have you made a costs application with this appeal? Yes ☒ No ☐

☒ see 'Appeal Documents' section

## I. (part one) SITE OWNERSHIP CERTIFICATES

Which certificate applies?

CERTIFICATE A

**I certify that, on the day 21 days before the date of this appeal, nobody, except the appellant, was the owner of any part of the land to which the appeal relates;** ☒

CERTIFICATE B

**I certify that the appellant (or the agent) has given the requisite notice to everyone else who, on the day 21 days before the date of this appeal, was the owner of any part of the land to which the appeal relates, as listed below:** ☐

CERTIFICATE C and D

**If you do not know who owns all or part of the appeal site, complete either Certificate C or Certificate D and attach it below.** ☐

## I. (part two) AGRICULTURAL HOLDINGS

We need to know whether the appeal site forms part of an agricultural holding.

(a) None of the land to which the appeal relates is, or is part of, an agricultural holding. ☒

(b)(i) The appeal site is, or is part of, an agricultural holding, and the appellant is the sole agricultural tenant. ☐

(b)(ii) The appeal site is, or is part of, an agricultural holding and the appellant (or the agent) has given the requisite notice to every person (other than the appellant) who, on the day 21 days before the date of the appeal, was a tenant of an agricultural holding on all or part of the land to which the appeal relates, as listed below. ☐

## J. SUPPORTING DOCUMENTS

01. A copy of the original application form sent to the LPA. ☒

02. A copy of the site ownership certificate and agricultural holdings certificate submitted to the LPA at application stage (if these did not form part of the LPA's planning application form). ☐

03. A copy of the LPA's decision notice (if issued). Or, in the event of the failure of the LPA to give a decision, if possible please enclose a copy of the LPA's letter in which they acknowledged the application. ☒

04. A site plan (preferably on a copy of an Ordnance Survey map at not less than 10,000 scale) showing the general location of the proposed development and its boundary. This plan should show two named roads so as to assist identifying the location of the appeal site or premises. The application site should be edged or shaded in red and any other adjoining land owned or controlled by the appellant (if any) edged or shaded blue. ☒

05. (a) Copies of all plans, drawings and documents sent to the LPA as part of the application. The ☒

plans and drawings should show all boundaries and coloured markings given on those sent to the LPA.

05. (b) A list of all plans, drawings and documents (stating drawing numbers) submitted with the application to the LPA. ☒

05.(c) A list of all plans, drawings and documents upon which the LPA made their decision. ☐

06. (a) Copies of any additional plans, drawings and documents sent to the LPA but which did not form part of the original application. ☒

06. (b) A list of all plans, drawings and documents (stating drawing numbers) which did not form part of the original application. ☒

07. A copy of the design and access statement sent to the LPA (if required). ☒

08. A copy of a draft statement of common ground if you have indicated the appeal should follow the hearing or inquiry procedure. ☒

09. (a) Additional plans, drawings or documents relating to the application but not previously seen by the LPA. Acceptance of these will be at the Inspector's discretion. ☒

09. (b) A list of all plans and drawings (stating drawing numbers) submitted but not previously seen by the LPA. ☒

10. Any relevant correspondence with the LPA. Including any supporting information submitted with your application in accordance with the list of local requirements. ☐

11. If the appeal is against the LPA's refusal or failure to approve the matters reserved under an outline permission, please enclose:

(a) the relevant outline application; ☐

(b) all plans sent at outline application stage; ☐

(c) the original outline planning permission. ☐

12. If the appeal is against the LPA's refusal or failure to decide an application which relates to a condition, we must have a copy of the original permission with the condition attached. ☐

13. A copy of any Environmental Statement plus certificates and notices relating to publicity (if one was sent with the application, or required by the LPA). ☐

14. If the appeal is against the LPA's refusal or failure to decide an application because of a dispute over local list documentation, a copy of the letter sent to the LPA which explained why the document was not necessary and asked the LPA to waive the requirement that it be provided with the application. ☐

## K. OTHER APPEALS

Have you sent other appeals for this or nearby sites to us which have not yet been decided?

Yes ☐ No ☒

## L. CHECK SIGN AND DATE

**(All supporting documents must be received by us within the time limit)**

I confirm that all sections have been fully completed and that the details are correct to the best of my knowledge.

I confirm that I will send a copy of this appeal form and supporting documents (including the full statement of case) to the LPA today.

**Signature**

Mr Mandip Sahota

**Date**

25/08/2025 23:48:12

**Name**

Mr Mandip Sahota

**On behalf of**

c/o Agent c/o Agent c/o Agent

The gathering and subsequent processing of the personal data supplied by you in this form, is in accordance with the terms of our registration under the Data Protection Act 2018.

The Planning Inspectorate takes its data protection responsibilities for the information you provide us with very seriously. To find out more about how we use and manage your personal data, please go to our [privacy notice](#).

## **M. NOW SEND**

### **Send a copy to the LPA**

Send a copy of the completed appeal form and any supporting documents (including the full statement of case) not previously sent as part of the application to the LPA. If you do not send them a copy of this form and documents, we may not accept your appeal.

To do this by email:

- open and save a copy of your appeal form
- locating your local planning authority's email address:  
<https://www.gov.uk/government/publications/sending-a-copy-of-the-appeal-form-to-the-council>
- attaching the saved appeal form including any supporting documents

To send them by post, send them to the address from which the decision notice was sent (or to the address shown on any letters received from the LPA).

When we receive your appeal form, we will write to you letting you know if your appeal is valid, who is dealing with it and what happens next.

**You may wish to keep a copy of the completed form for your records.**

## N. APPEAL DOCUMENTS

We will not be able to validate the appeal until all the necessary supporting documents are received.

Please remember that all supporting documentation needs to be received by us within the appropriate deadline for the case type. Please ensure that any correspondence you send to us is clearly marked with the appeal reference number.

**You will not be sent any further reminders.**

### The documents listed below were uploaded with this form:

|                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Relates to Section:</b>   | DESCRIPTION OF DEVELOPMENT                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Document Description:</b> | A copy of the LPA's agreement to the change.                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>File name:</b>            | Wandsworth (Validation 2025.0074).PDF                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Relates to Section:</b>   | FULL STATEMENT OF CASE                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Document Description:</b> | A copy of the full statement of case.                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>File name:</b>            | Appeal Statement of Case FINAL 250825.pdf                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Relates to Section:</b>   | FULL STATEMENT OF CASE                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Document Description:</b> | A separate list of appendices to accompany your full statement of case                                                                                                                                                                                                                                                                                                                                                                          |
| <b>File name:</b>            | Appeal Statement of Case - APPENDICES - FINAL 250825.pdf                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Relates to Section:</b>   | FULL STATEMENT OF CASE                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Document Description:</b> | A copy of the costs application.                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>File name:</b>            | costs_application_form_3 (2).pdf                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Relates to Section:</b>   | SUPPORTING DOCUMENTS                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Document Description:</b> | 01. A copy of the original application sent to the LPA.                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>File name:</b>            | ApplicationForm.pdf                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Relates to Section:</b>   | SUPPORTING DOCUMENTS                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Document Description:</b> | 03. A copy of the LPA's decision notice (if issued). Or, in the event of the failure of the LPA to give a decision, if possible please enclose a copy of the LPA's letter in which they acknowledged the application.                                                                                                                                                                                                                           |
| <b>File name:</b>            | Wandsworth (Validation 2025.0074).PDF                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Relates to Section:</b>   | SUPPORTING DOCUMENTS                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Document Description:</b> | 04. A site plan (preferably on a copy of an Ordnance Survey map at not less than 10,000 scale) showing the general location of the proposed development and its boundary. This plan should show two named roads so as to assist identifying the location of the appeal site or premises. The application site should be edged or shaded in red and any other adjoining land owned or controlled by the appellant (if any) edged or shaded blue. |
| <b>File name:</b>            | 23047-X1-101-Exising Site Plan.pdf                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Relates to Section:</b>   | SUPPORTING DOCUMENTS                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Document Description:</b> | 05.a. Copies of all plans, drawings and documents sent to the LPA as part of the application. The plans and drawings should show all boundaries and coloured markings given on those sent to the LPA.                                                                                                                                                                                                                                           |
| <b>File name:</b>            | 23047-P1-151-Block D - Proposed First Floor Plan.pdf                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>File name:</b>            | 23047-P1-160-Block E - Proposed Ground Floor Plan.pdf                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>File name:</b>            | 23047-X1-115-Picasso House - Existing Basement Plan.pdf                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>File name:</b>            | 23047-X1-120-Block A - Existing Ground Floor Plan.pdf                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>File name:</b>            | 23047-X1-121-Block A - Existing First Floor Plan.pdf                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>File name:</b>            | 23047-P1-161-Block E - Proposed First Floor Plan.pdf                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>File name:</b>            | 250110 Planning Statement SUBMISSION.pdf                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>File name:</b>            | Covering Letter 250110 SUBMISSION.pdf                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>File name:</b>            | 23047-X1-110-Picasso House - Existing Ground Floor Plan.pdf                                                                                                                                                                                                                                                                                                                                                                                     |

**File name:** 23047-X1-111-Picasso House - Existing First Floor Plan.pdf  
**File name:** 23047-P1-100-Proposed Site Plan.pdf  
**File name:** 23047-P1-110-Picasso House - Proposed Ground Floor Plan.pdf  
**File name:** Ecological Report (December 2024).pdf  
**File name:** LROE003 - Roehampton Landscape Plan-A0 Landscape P02.pdf  
**File name:** 23047-P1-120-Block A - Proposed Ground Floor Plan.pdf  
**File name:** 23047-P1-115-Picasso House - Proposed Basement Plan.pdf  
**File name:** 23047-P1-170-Bungalow - Proposed Bungalow Ground Floor Plan.pdf  
**File name:** 23047-P1-111-Picasso House - Proposed First Floor Plan.pdf  
**File name:** 23047-P1-130-Block B - Proposed Ground Floor Plan.pdf  
**File name:** 23047-P1-120-Proposed plans - Ground floor.pdf  
**File name:** 23047-X1-100-Existing Site Location Plan.pdf  
**File name:** 23047-X1-131-Block B - Existing First Floor Plan.pdf  
**File name:** 23047-X1-140-Block C - Existing Ground Floor Plan.pdf  
**File name:** 23047-X1-141-Block C - Existing First Floor Plan.pdf  
**File name:** 23047-X1-150-Block D - Existing Ground Floor Plan.pdf  
**File name:** 23047-P1-121-Proposed plans - First floor.pdf  
**File name:** 23047-X1-160-Block E - Existing Ground Floor Plan.pdf  
**File name:** 23047-X1-161-Block E - Existing First Floor Plan.pdf  
**File name:** 23047-P1-131-Block B - Proposed First Floor Plan.pdf  
**File name:** 23047-X1-130-Block B - Existing Ground Floor Plan.pdf  
**File name:** form\_1\_cil\_additional\_information.pdf  
**File name:** 23047-X1-151-Block D - Existing First Floor Plan.pdf  
**File name:** 241114 - Mount Clare DAS.pdf  
**File name:** 12056 Tree Constraints Plan.pdf  
**File name:** 23047-P1-121-Block A - Proposed First Floor Plan.pdf  
**File name:** 12056 Tree Schedule.pdf  
**File name:** 23047-X1-101-Existing Site Plan.pdf  
**File name:** 23047-P1-150-Block D - Proposed Ground Floor Plan.pdf  
**File name:** 23047-P1-141-Block C - Proposed First Floor Plan.pdf  
**File name:** 23047-P1-140-Block C - Proposed Ground Floor Plan.pdf  
**File name:** 241209 J328457 TS V1.4.pdf  
**File name:** 12056 Minstead Gardens Pre-Planning Tree Report.pdf  
**File name:** Mount Clare Campus\_Air\_Quality\_Assessment\_20.12.2024\_Final.pdf

**Relates to Section:** SUPPORTING DOCUMENTS

**Document Description:** 05.b. A list of all plans, drawings and documents (stating drawing numbers) submitted with the application to the LPA.

**File name:** 05b.pdf

**Relates to Section:** SUPPORTING DOCUMENTS

**Document Description:** 06.a. Copies of any additional plans, drawings and documents sent to the LPA but which did not form part of the original application (e.g. drawings for illustrative purposes).

**File name:** 23047-P1-121 - A-Proposed plans - First floor.pdf  
**File name:** 23047-P1-141 - A-Block C - Proposed First Floor Plan.pdf  
**File name:** 23047-P1-151 - A-Block D - Proposed First Floor Plan.pdf  
**File name:** 23047-P1-121 - A-Block A - Proposed First Floor Plan.pdf  
**File name:** 23047-P1-161 - A-Block E - Proposed First Floor Plan.pdf  
**File name:** 23047-P1-220 - -Proposed plans - Ground floor.pdf  
**File name:** 23047-P1-221 - -Proposed plans - First floor.pdf  
**File name:** 23047-P1-102 - A-Proposed First floor site plan.pdf  
**File name:** 23047-P1-131 - A-Block B - Proposed First Floor Plan.pdf  
**File name:** 23047-P8-100-Accommodation Summary Schedule REV A.pdf  
**File name:** 23047\_P1-115\_Rev A.pdf  
**File name:** 23047\_P1-110\_Rev A.pdf  
**File name:** LROE003 - Roehampton BNG Calculations.pdf  
**File name:** LROE003 - Roehampton Landscape Plan-A0 Landscape P03.pdf



|                              |                                                                                                                                                                                |
|------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>File name:</b>            | LROE003 - Roehampton Landscape Plan-A0 Landscape P04.pdf                                                                                                                       |
| <b>Relates to Section:</b>   | SUPPORTING DOCUMENTS                                                                                                                                                           |
| <b>Document Description:</b> | 06.b. A list of all plans, drawings and documents (stating drawing numbers) which did not form part of the original application.                                               |
| <b>File name:</b>            | 06b.pdf                                                                                                                                                                        |
| <b>Relates to Section:</b>   | SUPPORTING DOCUMENTS                                                                                                                                                           |
| <b>Document Description:</b> | 07. A copy of the design and access statement sent to the LPA.                                                                                                                 |
| <b>File name:</b>            | 241114 - Mount Clare DAS.pdf                                                                                                                                                   |
| <b>Relates to Section:</b>   | SUPPORTING DOCUMENTS                                                                                                                                                           |
| <b>Document Description:</b> | 08. A copy of a draft statement of common ground.                                                                                                                              |
| <b>File name:</b>            | Statement of Common Ground - Draft.pdf                                                                                                                                         |
| <b>Relates to Section:</b>   | SUPPORTING DOCUMENTS                                                                                                                                                           |
| <b>Document Description:</b> | 09.a. Copies of additional plans, drawings or documents relating to the application not previously seen by the LPA. Acceptance of these will be at the Inspector's discretion. |
| <b>File name:</b>            | 250422 - Transport Proof of Evidence v3.0 (Final).pdf                                                                                                                          |
| <b>Relates to Section:</b>   | SUPPORTING DOCUMENTS                                                                                                                                                           |
| <b>Document Description:</b> | 09.b. A list of all plans and drawings (stating drawing numbers) submitted but not previously seen by the LPA.                                                                 |
| <b>File name:</b>            | 09b.pdf                                                                                                                                                                        |
| <b>Completed by</b>          | MR MANDIP SAHOTA                                                                                                                                                               |
| <b>Date</b>                  | 25/08/2025 23:48:12                                                                                                                                                            |