

APPENDIX A OFFICER REPORT

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| Date: | 27/10/2025 | | |
| Item No. | Delegated | | |
| Site Address: | Mount Clare Campus, Minstead Gardens, Roehampton Gate, SW15 4EE | | |
| Application Number: | 2025/0074 | Date Validated: | 08/04/2025 |
| Ward: | Roehampton | Officer: | Pedro Rizo |
| Application Type: | Full planning application | | |
| Proposal: | <p>Use of existing buildings for temporary accommodation with associated landscaping.</p> <p><i>Officer's note: For the purpose of this report and considering dismissed appeal decision reference APP/H5960/X/25/3358768 dated 11th July 2025, it is the local planning authority's view that the description of the development should be updated, in accordance with wording in Section 3.0 of this delegated report.</i></p> | | |
| Recommendation: | Had an appeal against non-determination not been lodged the LPA would have been minded to refuse planning permission | | |

1.0 SITE DETAILS:

The application site comprises an irregular parcel of land of approximately 1.57 hectares in area that is bounded to the west by Richmond Park, with the Richmond Park Golf Club immediately adjacent along the park boundary, and fronts a stretch of Minstead Gardens, towards the northeast side. The site accommodates the Mount Clare campus and sits within the Alton Conservation Area and contains two listed buildings: Mount Clare House (Grade I) and the Temple (Grade II*). Most of the site is also situated within the 'Landscaping to Alton West Estate Registered Park and Garden' which was listed as Grade II (park and garden designation) by Historic England in 2020.

The site is occupied by the following complex of buildings:

- Mount Clare is a 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 is a folly building with external and internal decorative features. The building was built between 1762 and 1769 and is Grade II* listed. The building is also on Historic England's 'At Risk' register, as it has been subject to graffiti and other forms of vandalism.

- Picasso House/Hall is a two-storey building with a basement, which was built in the 1960s, and was originally designed to accommodate a dining hall with ancillary facilities at ground floor level, together with twenty-eight residential rooms that were accommodated 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 are 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) is 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 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' is 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' is a small building with one open side located adjacent to the Garage. The building is also in a state of disrepair, and its previous use is not known.

The complex of buildings sits within landscaped grounds and are accessed via a single vehicular access point at the northeast side across Minstead Gardens, which passes at the front of Mount Clare House and leads to a small car parking and turning area. The surrounding area is predominantly residential in character and comprises a mix of bungalows and tower blocks constructed by London County Council in the 1960s, as part of the Alton West Estate. The staggered terraces of bungalows to the east of the site, at 1-13 and 15-33 Minstead Gardens are Grade II listed and to the north of Downshire Field are five Grade II* listed slab blocks that also form part of the Alton Estate (Dunbridge, Denmead, Charcot, Winchfield House and Binley House). The context of the site is also characterised by a sloping topography with green spaces including the landscaped setting of Downshire Fields, with several TPOs, that blend in with the open and green character of the neighbouring Richmond Park.

The site is identified as being suitable for strategic development and falls within a Local Plan Site Allocation (RO2), which seeks for a mixed-use development with residential uses, that considers the future role of the Grade II Temple.

The site has a Public Transport Accessibility Level (PTAL) of 1b, which is classified as 'low'.

2.0 CONSTRAINTS:

- Archaeological Priority Area: Roehampton
- Conservation Area: Alton
- Grade II registered park and garden: Landscaping to Alton West
- Grade I listed building: Mount Clare
- Grade II* listed building: Temple in grounds of Mount Clare
- Site Specific Allocations: RO2 Mount Clare, Minstead Gardens, Roehampton SW15
- Tree preservation orders

3.0 RELATED PLANNING APPLICATIONS:

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 (*Condition 3 states that the permission is for a limited period of three years and that the use shall cease by 25th June 2021 and the land be returned to its former condition.*)

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 (*Condition 3 states that the permission is for a limited period of three years and that the use shall cease by 21st June 2024 and the land be returned to its former condition.*)

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). REFUSED. APPEAL DISMISSED.

The above appeal is directly relevant to this application as it relates to the existing use of the site and broadly similar proposals that are subject to this planning application. The main difference between the proposal under the dismissed appeal and the current application is that the former relates to a certificate of lawfulness and the latter is seeking planning permission, and proposed plans have been submitted showing the extent of the proposal for blocks A-E, the Lodge and Picasso House. The current proposal also includes provision for children's play space and landscaping works.

In addition, the Appellant has sought to admit to the inquiry three plans which relate to the re-development of the derelict former Lodge (bungalow). The Council has raised concerns with PINS in relation to the need for these to be consulted upon, whether the proposed works to the Lodge will comprise operational development, and whether a change will be required to the description of development to reflect the works. At the time of writing, it is unclear whether these plans will be admitted into the Inquiry.

The Inspector's decision on the appeal (ref. APP/H5960/X/25/3358768), dated 11th July 2025, identified the following matters which are directly relevant to the lawful use of the site and application:

42. At this time, those spaces [in Mount Clare and Picasso House] ceased to be used for purposes ancillary to the accommodation units. While the overall spaces/numbers of rooms in these other uses are relatively small compared to the available floorspace on the Site as a whole, these are disconnected uses. Thus, even if the uses have not continued for long enough to have become lawful in their own right, I find it more likely than not that this caused a material change of use of the Site to a mixed-use including student accommodation, storage, and office uses.

43. The appellant has no clear proposals for Mount Clare House. Its Grade I listed status makes it unsuitable for modification, and its layout does not lend itself to providing temporary accommodation. Communal facilities, such as catering and laundry, or ancillary support services may well be provided within Picasso House as part of a hostel accommodation offer. However, as per the application for the whole Site, the certificate is requesting confirmation that a single use would be lawful. That would be materially different to the current mixed use ongoing at the site in recent years.

44. In any event, I have considered whether the proposed use as a hostel for temporary accommodation is materially different to use of the Site for student accommodation.

63. Therefore, even in a scenario where a mixed use of the site had not been instituted, the use as a hostel for temporary accommodation would result in a material change of use of the Site. In any event, the change from a mixed use to the single use described certainly is. The making of a material change of use is development requiring planning permission and none has been obtained. The proposed use would not, therefore be lawful.

Thus, the Certificate of Lawfulness appeal decision confirmed that the Appellant's proposal would represent a material change of use.

The Council does not consider that the current application contains sufficient evidence/justification to gainsay the clear findings of the Inspector. On that basis, the Council considers that the description of development should read as follows:

“Change of use of Picasso, Albers, Andre, Appell, Balla, Bellini, Blake, Cornell, Catlin, Calder, Dali, Degas, Dufy, 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”.

The planning application has been considered against the plans and documents as submitted. Further, the Appellant provided (on 9 October 2025) three plans in relation to the Lodge at the appeal site (as noted above) as well as an Energy Statement. It is unclear whether these plans and Energy Statement will be admitted by PINS into the inquiry and the Council has suggested that this is discussed at the Case Management Conference. Therefore, the Council sets out some preliminary views on those plans below and requests the right to make any further response, as necessary, in the event the plans are admitted and following any consultation/publicity exercise on them.

4.0 PROPOSAL

The proposed development involves a permanent change of use of the existing buildings to temporary accommodation as a hostel (sui generis use class) to accommodate 264 rooms with communal facilities, alongside the rebuilding/replacement of the Lodge and provision of ancillary refuse/cycle stores, landscaping, play space and associated works. The submitted planning statement describes the proposed use as ‘providing temporary accommodation for homeless people’, which would be offered to the London Borough of Wandsworth (LBW) on a first refusal basis to use as temporary accommodation. It is noted that the permanent planning permission is sought for this use, but it is not known on what terms or to what duration the temporary accommodation would be offered to LBW or any other operator. Furthermore, the planning statement does not provide further details of who would occupy the temporary accommodation if LBW does not secure the site for its use, or much detail as to how the temporary accommodation would be managed.

The proposed development does not involve physical alterations to Mount Clare House (Grade I Listed Building) or the Temple (Grade II* Listed Building). As noted, the development would require the rebuilding/replacement of the Lodge (also referred to in the application documents as the Bungalow), by reason of the building’s state of disrepair. No elevations were provided with the planning application or with the appeal documents when the appeal was lodged. The Council raised this concern with the Appellant in writing on 8 August 2025. On 9 October 2025, the Appellant provided PINS (copying the Council) with three plans which are relevant to the Lodge. As set out above, the Council provides some initial comments upon these below but would request an additional opportunity to comment if the plans are admitted to the inquiry and once any consultation/publicity has been carried out.

The development does not involve material alterations to the site layout and the entrances to the buildings would remain as existing. However, the internal layout of the blocks A-E would be reconfigured, to accommodate en-suite bathrooms and kitchenette facilities. As such, the current bedrooms within each of the fifteen accommodation blocks (A-E) would be retrofitted to accommodate new bedrooms within each block.

The proposed refurbishing of Picasso House would enable an increase from 28 to 35 bedrooms, separated into 12 units at ground and first floor level, and the ground floor would provide communal kitchen facilities alongside a communal amenity room, cycle parking and concierge area.

The original plans for Picasso House submitted with the application proposed to use the entire ground floor for accommodation and to use the full extent of the basement for bin and bicycle storage, as well as shared facilities including WCs, laundry, kitchens and common rooms. During the course of the application, revised drawings were provided that only utilise part of the basement for plant, storage, refuse and a cycle store (26 cycle parking spaces), with communal facilities at ground floor level, alongside residential accommodation and two cycle parking stores.

The Lodge (Bungalow) would accommodate new bedrooms and toilets. As noted, and as also identified during the certificate appeal, the building is in dilapidated condition and in a state of disrepair. The development is therefore likely to require the rebuilding/replacement of the building as the current condition would not allow only refurbishment.

The existing access arrangement to the site would be retained as part of the proposal using the vehicular access at Minstead Gardens, located towards the northeast side of the site. The development would also retain the existing 24 car parking bays and would accommodate a total of 106 cycle parking spaces, as confirmed in the submitted Transport Statement (dated December 2024).

5.0 COMMUNITY INFRASTRUCTURE LEVY (CIL)

CIL liability is subject to confirmation by the CIL administration team, considering the rebuilding/replacement of the Lodge building, whether there is any existing lawful use, and the revisions to the description of the development. Additional information on CIL liability was therefore requested to the applicant in writing, for which no response on this matter was received at the time of writing the delegated report.

6.0 CONSULTATION

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| Number of letters sent | 129 |
| Site notice | Yes – planning application and listed building site notice - 21/04/2025 |
| Press notice | Yes – listed building press notice - 23/04/2025 |
| Number of responses received | 8 |
| Number of objections | 7 |
| Number of general comments | 0 |
| Number of letters of support | 1 |

A total of 7 letters of objection have been received, including objections from the Putney Society and the Charcot House Residents Association. In addition, one letter of support from the University of Roehampton dated 21/08/2025 has been received. Although this letter was received after the statutory consultation period ended, the points raised have been considered as part of this assessment. The responses received are summarised below.

In addition to the letters listed above, correspondence has been received from Cllrs Henderson and Yates, asking for their objections to the application to be noted and stating that they will be submitting more detailed objections. However, at the time of

writing, these have not been received.

Supporting letter from the University of Roehampton dated 21/08/2025, summarised as:

- The application advises that licences would typically be granted for one year and would not be extended, and student residents are typically granted licences for longer periods (39-51 weeks).
- The university accommodates a diverse student body.
- The previous occupant of Mount Clare was Garnett College, which moved elsewhere, and residents had different needs to the University of Roehampton.
- The university has been managed by a single entity and addressed issues linked to anti-social behaviour. The proposed development would follow similar disciplinary processes to those followed by the university.
- The Mount Clare site buildings were used as student accommodation and not for research or teaching.
- There would be similarities between the proposed use of the local infrastructure as well as with the positive impact that university occupants brought to the local community and economy.
- The transport needs of students and occupiers of the proposed development are similar.
- There is low demand for students in the local area, by reason of increase of bedrooms within the campus and little demand in the local area for student accommodation.
- There is a mixed-use approach under the site allocation for Mount Clare under the Local Plan adopted in 2023.

Objections summarised as:

Issues relating to the quality of accommodation:

- The proposed standard of accommodation would be cramped, as the single rooms would not provide adequate accommodation for one person and their belongings.
- The communal facilities would not provide an acceptable social environment, and the shared amenity areas would not meet the demand for future residents and the number of single bed spaces.

Issues relating to crime and safety:

- Concerns regarding crime and a potential increase in antisocial behaviour and crime rates, alongside risks of creating fear, anxiety and hostility among local residents.

Issues relating to heritage:

- The proposal does not consider a meaningful use that includes the repair and

security of the Grade I listed Mount Clare House and Grade II* listed Temple.

Issues relating to local infrastructure:

- Existing amenities are already pushed to their limits and there is concern about the impacts of the proposed increase in residents. The impacts on local infrastructure and public services have not been sufficiently considered and could result in displacement of current residents as demands increase on roads, parks and open spaces, transport, schools, nurseries, dentists, GPs, etc.
- There is a lack of a range of local amenities and no facilities to accommodate the proposed population increase.

Issues regarding the transport impacts of the development:

- Travel connections are poor and expensive for those on restrained incomes, so they may stay in the area.
- Bus services have recently been reduced.
- Potential increases in traffic, pollution and parking issues.

Issues relating to the proposed temporary accommodation:

- It is unclear who would occupy the units and for how long and who would be held accountable for the effective and responsible management of the site.
- Whilst the management protocols include 24-hour security and welfare visits, the application does not make clear who will be responsible for ensuring that the protocols are met. There is no provision for a permanent, on-site welfare officer.
- The supporting information does not clarify why it is considered that the accommodation will be suitable for those on the Council's housing waiting list.
- Homeless housing priority is for families – the small units would not be suitable for this. Speculation that the units will probably mainly provide single sex accommodation for males which is a group who, apart from disabled people, would not qualify for emergency housing support.
- The proposed single units fail to respond to the housing need within the area.
- Roehampton has been saturated with 'temporary accommodation' and therefore the application would defeat the purpose of building a cohesive community.
- Family accommodation is needed within the surrounding area, and the proposal appears to predominantly comprise single units.

Statutory and external consultees:

Historic Buildings and Conservation Committee of London and Middlesex Archaeological Society (LAMAS): No response.

Historic England: No response received.

London Borough of Richmond: No response.

London Parks and Gardens: No comment.

Metropolitan Police: No response.

National Amenity Societies: No response.

Police Design Liaison Officer: No response.

The Gardens Trust: No objections, but the following comments noted: "The Landscaping to Alton West Estate's incorporates twentieth century landscape design by the LCC's Architect's Department overlaying two eighteenth century landscapes, one of which was designed by Lancelot Brown. Its significance lies in its dual character as a modern, post-war landscape that incorporates strong elements of eighteenth-century design. A further important aspect of its significance is its intactness, whereby the views, planting and structural elements of the original design remain clearly visible within the RPG. Given the RPG's high level of intactness, we wish to impress upon your officers the importance of ensuring that the landscaping works do not erode the intact landscape design. We note that there are proposed additions to the landscaping, and we wish to highlight that it is vital that these are included in such a way that the original design is not compromised, and that they be easily altered or moved once the longer-term vision and use for the RPG has been decided".

Transport for London (Town Planning): No response.

Transport for London (Infrastructure protection): No comments.

Internal consultees:

Adult Social Services: No response.

CCTV: No response.

Environmental Services (noise and nuisance): No comments.

Head of Emergency Services: No response.

Housing: No formal comments but see below for Specialist Housing Occupational Therapist comments.

Specialist Housing Occupational Therapist: Provided comments as follows:

Notes that p.27 of the DAS states that there are 196 units in total but that it appears that only seven of them would be accessible units, located on the ground floor of Picasso House. Acknowledges that the development is not a new-build where 10% of homes are required as M4(3) units but notes that it has been well documented and researched that there are likely to be a higher number of disabled residents in the proposed client group.

Notes that there are access issues that could prevent the provision of additional wheelchair units but strongly recommends that inclusive design and products are considered for all the units on the site, especially for ground floor units, and for the common shared areas. Queries the accessibility of Picasso House, including whether automated communal entrance doors are provided to Picasso House, and the lack of accessible toilets, and whether the laundry would be accessible for everyone. Notes that the kitchen, refuse area and bike store will also need to include accessible elements.

Queries how long residents are likely to stay in the accommodation and raises concern about the size and layout of all units within Picasso House (where the accessible units would be provided).

Accessible parking bays should be made available close to Picasso House, noting that none are shown on the drawings.

Officer note: Revised drawings of Picasso House have since been received, reducing the number of units to be provided at ground floor level, which are not reflected in the comments from the Occupational Therapist summarised above. The submitted plans illustrate one single wheelchair accessible unit. Similarly, the recently submitted plans for the Lodge are not reflected in the above.

Transport Planning: No objections subject to the following conditions:

The following conditions are recommended:

- Details of cycle parking to be approved by the Council prior to the commencement of development.
- A delivery and servicing management plan to be approved by the Council prior to the commencement of development, to assess how waste will be collected from individual rooms, with appropriate waste collection areas.
- A vehicular parking management plan to be approved by the Council prior to the first occupation of the development.
- A travel plan statement to be approved by the Council before first occupation of the development.
- A construction management plan to be approved by the Council prior to commencement of development, to ensure road users are kept safe throughout any construction process.
- Details of proposed stepped structure and retaining wall at Picasso House to be approved by the Council prior to commencement of development.

The following comments provided:

It is unlikely that the proposed development would create a severe impact on the operation of the bus network within the context of the site. No concerns with regards of overspill parking as a result of the development, as the estimated 66 vehicles could be absorbed.

The proposed cycle parking provision can be accepted, but due to the underused space west of Picasso House, the development could provide more than 106 cycle parking spaces and it is proposed to consider 0.65 spaces per bedroom, giving a total of 180 spaces. Long-stay cycle parking should be sheltered and secured and a condition with details of cycle parking is requested prior to commencement of development.

The proposed plans have been reviewed by the Borough Highway Engineers, and concerns over the maintenance margin are raised, as vehicles could strike the structure as these turn out of the site access. Details of the proposed stepped structure are therefore recommended by condition, prior to commencement of development.

No travel plan has been submitted; therefore a travel plan statement is required to reduce the number of single occupancy car trips and ensure that opportunities to travel by sustainable modes of transport are considered.

In summary, no objections are raised subject to conditions, addressing the issues raised above.

Officer note: The amended plans would uplift the number of cycle parking spaces to 146 but this number conflicts with the submitted Transport Statement.

Waste Strategy Manager: Comments provided:

Notes that the basement plan bin store (illustrated with 21x1,100 and 1,280 litre bins) is sufficient to provide refuse and mixed recycling capacity for the equivalent of 109 households and that 8x250 litre food recycling wheelie bins would also be required for that number of households. It may be possible to accommodate these by rearranging the layout of bins within the store, otherwise management arrangements may be required to rotate full and empty bins to ensure that empty bins are accessible at all times for all three waste streams.

Queries whether there is space for storing bulky items awaiting collection.

Notes that the door to the bin store may need to be widened to allow the bins to pass through with suitable clearance.

It is not clear where waste collection vehicles could wait but notes that it appears that bins would need to be moved 10m within the building just to reach the door, so internal management arrangement may be needed to present them at a more accessible collection point, however, this is not shown on the drawings.

Officer note: Revised drawings of Picasso House have been received, reducing the number of units to be provided at ground floor level, which are not reflected in the comments from the waste strategy manager summarised above.

Conservation and Design: Objection.

Considers that insufficient information has been provided to assess the impact of the development on the designated heritage assets, contrary to the requirements of the statutory duties of the Act, and paragraph 207 of the NPPF (2024).

Concerns raised with regards to how the replacement of the former Lodge could affect the landscape significance of the site and how it would reinterpret the principles of the landscape character of the site as well as the setting of the Grade II* listed temple. Additionally, concerns raised over the number of interventions within the landscape of the park, particularly with regards to the cycle parking and the potential cumulative impact on the historic park and garden, which could give rise to less than substantial harm. Insufficient information on some aspects of the scheme which results in an inability to identify if harm would occur to the heritage assets, and if so, the level of harm.

The Heritage Statement does not include an assessment of significance of the heritage assets and does not acknowledge that the site is located in a registered park

and garden, a requirement of paragraph 207 of the NPPF. Furthermore, concerns raised over how the proposal doesn't provide information of the long-term management and maintenance of the temple to secure its role for the future, as required by Local Plan site allocation RO2 (2023).

7.0 RELEVANT PLANNING POLICIES:

National Planning Policy Framework (December 2024)

Chapter 2: Achieving sustainable development

Chapter 4: Decision-making

Chapter 5: Delivering a sufficient supply of homes

Chapter 8: Promoting healthy and safe communities

Chapter 9: Promoting sustainable transport

Chapter 11: Making effective use of land

Chapter 12: Achieving well-designed places

Chapter 15: Conserving and enhancing the natural environment

Chapter 16: Conserving and enhancing the historic environment

London Plan (2021)

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)

H10 (Housing size mix)

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)

Mayor of London's Supplementary Planning Guidance (SPGs and LPGs):

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)

Wandsworth Local Plan (2023)

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)
LP24 (Housing mix)
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)

Wandsworth's Supplementary Planning Documents (SPDs):

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

Local Plan Partial Review

The LPA 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

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).

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 the emerging 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.

8.0 PLANNING CONSIDERATIONS

The main planning considerations that are material to the assessment of this application have been summarised as follows:

- A. Lawful Use of Site
- B. Principle of Development
- C. Design and Impact on Heritage Assets
- D. Standard of Temporary Accommodation
- E. Impact on Amenity
- F. Highways and Transport
- G. Waste Management
- H. Environmental Impact
- I. Energy Efficiency and Sustainability
- J. Trees and Landscaping
- K. Safety and Security
- L. Community Engagement
- M. Conclusion and Reasons for Refusal

A. Lawful Use of Site:

The application states that the site benefits from an existing temporary hostel use. However, the recent certificate of lawfulness appeal (33588768) recently confirmed that this was not the case and “use as a hostel for temporary accommodation would result in a change of use for the site”.

The Council considers, in line with the recent appeal decision that the applicant has not demonstrated that the lawful use of the site is as a ‘hostel’ which would incorporate its proposed use. Indeed, the applicant has not demonstrated that the site benefits from any lawful use.

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 the Council's appeal Statement of Case in relation to this application. That case is not repeated here.

B. Principle of Development

The National Planning Policy Framework (NPPF) (2024) places a presumption in favour of ‘sustainable development’ and states that there should be a ‘golden thread’ running through plan and decision making. These principles are reflected in various local plan policies.

The site forms part of the Local Plan Site Allocation (RO2), which is flexible in nature and does not specify the housing type expected as part of the allocation. However, paragraph 9.29 states that the expectation is for a “mixed-use development with residential uses”, and in relation to design and massing, the policy adds that “any development will need to respect the scale and setting of the heritage assets”. It should also be noted that the site allocation states that any proposals must consider the future role of the Doric Temple and secure its management and maintenance and should also consider reinstating the pond in front of the Temple to improve the biodiversity value of the site. Although these issues are addressed separately in the delegated report as part of the impact on heritage, it should be made clear that none of these aspirations have been acknowledged by the application.

Policy D3 of the London Plan (2021) states that “all development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth, and existing and planned supporting infrastructure capacity”. The Local Planning Authority notes how the “most appropriate form of development” is key when assessing the acceptability of the proposed development.

At a local level, policy PM7 of the Local Plan (2023) seeks for any form of regeneration within the Alton Estate to deliver new and improved community spaces, with provision of a range of facilities and activities to meet the needs of new and existing residents in a way that development supports community cohesion. In addition, policy PM1 of the Local Plan (2023), states that planning permission will be granted where the proposed development positively addresses the placemaking, inclusive growth and ‘People First’ principles and where the development would be in accordance with all other relevant development plan policies, and the detailed requirements and considerations set out in the Area Strategies and Site Allocations.

In addition, policy LP28 of the Local Plan addresses the loss of student accommodation and policy LP31 addresses specialist housing for vulnerable people.

In the context of the above policy requirements, the principle of the development is assessed below:

Site Allocation and Housing Delivery

Although the site allocation is flexible in nature and does not specify housing type or quantum of residential units, the site is included as part of the Local Plan housing pipeline within the Authority Monitoring Report 2023/24, which includes the expectation that the site will deliver up to 130 dwellings as part of any redevelopment, which would support the NPPF’s aspiration to increase housing supply and encourage sustainable growth. Policy RO2 seeks a mixed-use development that secures residential units and envisages the redevelopment of the entire site which would need to be sensitive and comprehensive, including the listed assets. This should also take into consideration the setting, role and maintenance of the temple. The failure to provide a mixed-use development and to approach the site as a comprehensive whole (including its heritage assets) represents a breach of policy RO2.

Based on the submitted plans, the site would result in a net gain of only 41 dwellings, as part of the following calculations:

- Dwellings – 13 (including the Lodge and Picasso House);
- Rooms – 180 (including other remaining buildings).

The proposed type of temporary accommodation closely corresponds 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 41 dwellings onsite, which is considerably lower than the expectation for the number of dwellings on site, as per the Local Authority's Monitoring Report (2023/24).

These calculations reflect the fact that the development would fail to respond to the aspirations set out by the site allocation under policy RO2 of the Local Plan (2023) and would not be in line with a design-led approach that optimises capacity, as set by policy D3 of the London Plan (2023). As such, the principle of the development conflicts in principle with Chapter 5 of the updated National Planning Policy Framework (December 2024), which encourages local planning authorities to “support the Government’s objective of significantly boost the supply of homes”, considering also that the borough has a 10-year target set in the London Plan of creating 19,500 homes.

Loss of Student Accommodation

As set out above, the applicant has not demonstrated that the site benefits from any lawful use. However, if there is a lawful use of the site, then it is highly likely to include student accommodation. On that basis it is relevant to consider the proposal against the requirements of policy LP28 of the Local Plan (2023), which states that that:

The loss of existing student accommodation will be permitted where it is demonstrated that the facility no longer caters for current or future needs and the floorspace is replaced by another form of residential accommodation that meets other Local Plan housing requirements. Proposals for a change of use of existing student accommodation which result in the net loss of residential floorspace will only be permitted when:

- 1. The loss of student accommodation would be solely at ground floor level;*
- 2. The development would replace the ground floor student accommodation with active ground floor uses; and*
- 3. The proposed ground floor uses would pass the sequential test for main town centre uses in accordance with Policy LP43 (Out of Centre Development).*

The London Plan policy H15 (2021) states more widely that “boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed”.

The application sets out that as part of the proposal, the need for student accommodation within the context of the site is limited. A letter of the University of Roehampton dated 21/08/2025 confirms the lack of need for student accommodation. In addition, a letter from Spring 4 dated 22/07/2025 reiterates the issues raised by the

University of Roehampton. Due to these representations and in the absence of any contrary evidence to establish a need for this student accommodation on this site, the Local Planning Authority agrees in principle with the points raised by the applicant with regards to loss of student accommodation.

However, policy LP28 also provides that ‘the floorspace is replaced by another form of residential accommodation that meets other Local Plan housing requirements’. As set out below, it is not considered that the Appellant’s proposal meets other Local Plan housing requirements. As such, policy LP28 is breached to this extent.

Proposed Sui Generis Use

The proposed use is *sui generis* temporary housing or temporary accommodation which the applicant states would be to accommodate homeless people. Policy LP31 of the Local Plan (2023) relates to specialist housing for vulnerable people and for older people and given the nature of the proposed development, this policy is therefore relevant. The policy states that proposals for the development of specialist and supported housing will be supported where:

- 1. The applicant can robustly demonstrate that the accommodation meets an identified need, having regard to the evidence set out in the Council’s most up to date Local Housing Needs Assessment, where this is relevant, and the Council’s commissioning and housing strategies.*
- 2. The accommodation is of a high quality and meets relevant best practice guidance for this type of accommodation.*
- 3. The accommodation has access to good levels of public transport, and to shops, services and leisure facilities appropriate to the needs of the intended occupiers; and*
- 4. Affordable housing is provided, in accordance with policies H4, H5 and H13 of the London Plan.*

Meeting an Identified Need

The LPA does not deny the high level of need for urgent accommodation, with the Council’s online live waiting list showing that there are currently approximately 11,000 households on the waiting list, of which around 4,000 households are categorised as homeless.

The housing services activity update presented at Wandsworth’s Housing Committee on 23 January 2024 provided a summary of the homeless demand and states that as at the end of November 2023, homeless cases in all forms of temporary accommodation numbered 3,717 in total.

Within the total, 291 households were either still in the accommodation they were at risk of homelessness from, or making their own arrangements for temporary accommodation, most often with family or friends. Appendix 2 of the 23 January 2024 Housing Committee report provides a summary of the homelessness queue, which shows that in 2023/24 the queue was predominantly for family accommodation (minimum of two bedrooms) which made up 69% of the homelessness queue. Local

evidence indicates that there is a need to provide accommodation for people at risk of homelessness, however, the need appears to be primarily for self-contained family accommodation.

This is also consistent with the homelessness prevention needs on a London-wide level, as summarised in London's Temporary Accommodation Emergency (March 2024) report by the London Assembly Housing Committee, which summarised the CLG live tables from July to September 2023, showing that among households assessed as owed a main homelessness duty: more than half of households included dependent children; around one in ten households had a physical disability or ill health; almost one in ten experienced mental health problems; and almost one in ten had experienced domestic abuse.

Whilst it is clear that the proposal would meet some of what is an acute need and significant weight is given to this fact it is necessary to note that the proposal would result in an over-concentration of single person households, as the proposed layout provides over 80% of the habitable rooms for single people, which would be a considerable proportion of the households across the site. The proposed sui generis use for temporary accommodation would not respond to the identified need of majority family accommodation.

The development is proposing to provide some shared facilities and therefore, the provisions of LP29 are relevant. This policy resists the overconcentration of single-person accommodation at neighbourhood level. It is noted that the applicant considers that their proposals would not meet the definition of an HMO. Even if this were the case it is considered that the overconcentration of single-person accommodation would be a material consideration which weighs against the proposal.

Additionally, the development would accommodate a transient population that would fail to support the aspirations set by the Local Plan to ultimately support mixed and sustainable communities (see for example GG4(C) of the London Plan). The over-concentration of this type of use in one location would not ultimately further the objective of supporting mixed and balanced communities, particularly with such high levels of single-person accommodation. It is further noted that policy H10 of the London Plan notes a requirement to provide a range of unit sizes which has regard to the particular need and demand, and LP24 of the Local Plan requires residential schemes to include a range of house sizes to address local need and to avoid over-concentration of a single size of homes where this would undermine the achievement of creating mixed and balanced communities. As such, the proposed sui generis use for temporary accommodation is not supported.

Furthermore, the local planning authority is committed to providing housing for vulnerable households that is fit for purpose and high quality as the policy requires and which provides a safe environment to appropriate standards. Concerns with regard to the quality of accommodation are addressed below in Section C of this report. In short, it is not accepted that the accommodation is of a high quality and meets relevant best practice guidance for this type of accommodation. This is contrary to both LP29 and LP31.

Location and Access to Local Services

Mount Clare campus is in an area with a poor public transport access level of 1b (on a scale from 0-6b, where 6b is best) and residents who do not have access to their own transport are more likely to rely on local services. The Local Plan's area strategy for Roehampton and Alton Estate Regeneration Area describes Roehampton as an area of contrasts that is home to large scale buildings of scenic, cultural and historic value, private sports club and stretches of Metropolitan Open Land (MOL), but also an area of socio-economic challenges. Roehampton houses some of the most deprived areas in the borough, with high levels of economic inactivity and unemployment, and pockets of higher-than-average crime levels and ill health.

Roehampton is designated as a 'local centre' in the Local Plan, with the area's shops and community facilities focused on Danebury Avenue and Roehampton High Street. Mount Clare campus is approximately 750m from the parade of shops in Danebury Avenue, and the Local Plan notes it has a lack of leisure, community and entertainment facilities or restaurants and also suffers from a poor public realm and poor maintenance and condition of the buildings. Roehampton High Street is approximately 200m further away. A small parade of shops is located nearer the site in Portwood Place, approximately 150m away from the site boundary.

The Local Plan (2023) notes in paragraph 9.4 (Area Strategy for Roehampton and Alton Estate Regeneration Area) that the high levels of economic inactivity and unemployment within the area are inherently linked to the poor access to employment opportunities within Roehampton, which is also a product of the low PTAL and the relative distance from the borough's main centres. The low PTAL also results in Roehampton feeling disconnected, particularly as the area is beyond an acceptable walking distance to rail and underground stations. Some of the letters of objection received mention the poor transport access and many also raise concern about the availability of local amenities, including that there is no local police station and that some other emergency services are also some distance away, but also that existing amenities are already at capacity and that further increase in residents could reduce the availability of services for current residents.

In so far as it is relevant to consider a comparison of the student accommodation with the proposed use (in the event that a lawful use does persist at the site), the Inspector identified in his decision under appeal reference 3358768 the following points:

- 57. However, while students are likely to place some reliance on local shopping and leisure facilities, they would also have access to the university-based facilities. The Council has suggested that their social activities are likely to revolve around the university and its facilities. By contrast those who find themselves in the proposed temporary accommodation could have existing social commitments elsewhere and would only use facilities for the general population.*
- 58. The appellant's witnesses sought to downplay this, partly on the basis that there are a number of local services and facilities closer to the site than the university campus that could be used by students. But, while the University of Roehampton has indicated that its students can, and probably did use these facilities, and were said to be well integrated into the community, there is no*

substantive evidence as to the extent that they do (or did) when residing at the Site.

59. The University of Roehampton provides a students' medical centre that is serviced by a local GP practice. On that basis, it is likely that the demand on doctor time would be indifferent, as patients would just be seen in a different place by the same healthcare professionals. However, there is no obvious reason why, for example, students would use other nearby community services such as libraries, community centres, employment centres, adult education centres and the like, to anywhere near the same extent as residents unconnected with a university, as comparable university facilities are likely to be far more suited to students' needs. Whether or not those local facilities have capacity to accommodate additional pressure, the presence of extra demand and differences in occupants' need for them is materially different in this regard."

The Inspector's findings indicate that the proposed change of use to hostel for temporary accommodation would result in materially different needs for access to local services and impacts upon local services than student accommodation whose residents had campus facilities available to them. The letter of support from the University of Roehampton considers that the proposed temporary use would lead to similar use of infrastructure as used by university students. However, no details of forthcoming temporary residents are provided to conclude that these would have similar demand on local infrastructure, such as medical facilities, leisure or educational facilities.

On basis of the above, it is considered that the proposed accommodation would, on balance, not have access to good level of public transport, shops, services and leisure facilities appropriate to the needs of the intended occupiers and therefore fails to comply with part B (3) of Local Plan policy LP31 and LP29 part A(4)

Affordable Housing

Policy H4 of the London Plan (2021) requires all major developments that trigger affordable housing requirements to provide affordable housing through the threshold approach, with additional requirements set out in policy H5 of the London Plan (2021). The development is considered a major application, and policy H5 of the London Plan (2021) sets out a threshold approach that applies to major development proposals, which trigger affordable housing requirements with a minimum of 35% of affordable housing on gross residential developments.

Given that the proposal includes housing based on the definitions within the Housing Act 2004, the local planning authority would generally expect a minimum of 35% affordable housing on gross residential accommodation development or the option to follow a viability tested route when it does not meet the threshold requirements. In this instance, the proposed sui generis use would most closely align with Large Scale Purpose Built Shared Living (LSPBSL) accommodation, and it would be therefore appropriate to assess the maximum level of affordable housing that the development could secure, as a Payment in Lieu, in line with policy H16 of the London Plan (2021), which requires a viability tested route for LSPBSL schemes.

At a local level, policy LP23 of the Local Plan (2023) states that the Council will seek to maximise the delivery of affordable housing in accordance with the London Plan. This would contribute to securing the Mayor's strategic target that 50 per cent of all new homes are to be affordable.

The applicant is not proposing to provide any affordable housing. This is contrary to part B(4) of LP31 and relevant affordable housing policies. Furthermore, in light of the high need for affordable housing, the Local Planning Authority considers that the development proposal is not in accordance with the aspirations of the Local Plan to meet the requirements of residents in a way that it supports inclusive and sustainable communities.

In the absence of an Affordable Housing Statement and a Viability Report, no assessment to ascertain the maximum level of affordable housing contributions that the development could deliver has been carried out. Under these terms, it is not clear if all options to optimise the scheme in terms of delivery of affordable housing and viability as also required by Local Plan policy LP23 of the Wandsworth Plan (2023) have been explored and therefore this point of concern constitutes a shortcoming in the submission.

Conclusion on Principle of Development

In light of the above policy considerations, the principle of the development is not supported.

Whilst the proposal would meet some of the clear and pressing need for temporary accommodation in the borough, and significant weight is given to this, the proposed temporary accommodation under sui generis use class would not be consistent with the aspirations set out in the site allocation (RO2) of the Local Plan (2023) or policy D3 of the London Plan (2021), by reason that it would not accommodate a mixed-use form of development with residential uses in a way that makes the best use of land, delivering new homes within a context which is characterised by permanent dwellings. The proposed development also fails to consider the future role of the Doric Temple and secure its maintenance and management.

With regards to the requirements of LP28, whilst the Local Planning Authority accepts in principle that the applicant has demonstrated that there is no need for the student accommodation on the site, the development is not consistent with other housing policies in the Local Plan. These include LP29 and LP31.

The proposed development fail to respond to the complexion of need within the context of the site and would deliver an overconcentration of single households, contrary to policy LP29 and LP31.

The proposed use of the site to provide specialist housing would not meet the requirements of Local Plan (2023) policy LP31, whilst it would meet some of the need the proposal for predominantly single person accommodation does not respond to the complexion of the need in the borough, the quality of accommodation being proposed is inadequate (which is explained further below) and the poor level of public accessibility, with limited access to public transport, shops, services and leisure facilities as well as the failure to provide affordable housing in line with relevant policies.

These considerations also fail to meet the requirements of policy LP29.

On the matter of affordable housing, the submission does not propose any affordable housing contribution and the applicant has not put forward any justification for this. Thus, it has failed to demonstrate that it meets the requirements of London Plan policies H4 and H5 together with Local Plan policy LP23 in relation to the optimisation of the site in relation to the delivery of affordable housing. As such, the principle of the development is not supported and is considered contrary to policies D3, H4, H5 and H16 of the London Plan (2021) and policies RO2, LP21, LP23, LP28, LP29 and LP31 of the Local Plan (2023).

C. Design and Impact on Heritage Assets

Sections 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 requires that, when considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building, its setting, or any features of special architectural or historic interest which it possesses. In this context, “preserving” means doing no harm. In cases where the decisionmaker is satisfied that there will be no harm to a listed building or its setting, the statutory presumption against granting planning permission in section 66(1) falls away and the development should be permitted or refused in the application of ordinary planning criteria.

Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 requires that, with respect to any buildings or other land in a conservation area, or its setting, when considering whether planning permission should be granted, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area. In this context ‘preserving’ again means doing no harm.

Policies D3 and D4 of the London Plan (2021) seek a design-led approach that optimises site capacity in a way that the local context of a site is enhanced by development proposals that respond to local character, by incorporating appropriate layout, landscaping features and overall enhancement of external visual appearance. The design guidelines should be street-based with efficient servicing and maintenance strategies that also protect the public realm.

Policy HC1 of the London Plan - a borough should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London’s historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.

HC1B of the London Plan - development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify

enhancement opportunities by integrating heritage considerations early on in the design process.

As noted above, policy RO2 provides (at paragraph 9.30) that 'Any proposals must consider the future role of the Doric Temple and provide a scheme for its long-term management and maintenance'. Further, as a strategic allocation it is clear to the Council that this contemplated a long-term solution for the entirety of the site would necessarily be sensitive to the need to preserve and enhance the significance of the listed assets on site.

The application site is situated within a particularly sensitive location in heritage terms, and the area contains some of the highest concentrations of designated heritage assets in the borough as follows:

- The site lies within the Alton West Conservation Area.
- It lies within the Alton West Registered Historic Park and Garden (Grade II)
- The site contains Mount Clare, listed Grade I.
- The site contains the Doric Temple, listed Grade II*.
- The site lies within the Roehampton Tier II Archaeological Priority Area.
- The site is covered by Tree Preservation Order TPO 248/99.
- The site lies within sub-area 4 of the Alton Estate Conservation Area.

Mount Clare House

Mount Clare (by Robert Taylor, built between 1770 and 1773, Grade I) is a Palladian villa with a rusticated lower-ground floor and stucco upper floors and a half-octagonal centre projection to the rear, a characteristic piece of Taylor's ingenuity. It forms a particularly fine example of the large Palladian country villa from this period, attributing architectural interest. It is also of historic interest as a rare and largely unaltered survival that illustrates the important 18th century development of this part of Roehampton, forming part of a group of villas which took full advantage of their proximity to the Royal Deer Park of Richmond Park. The building itself has suffered little alteration although it previously had a large Victorian extension to the side which was later demolished.

When originally built, it sat within an open well-landscaped setting, designed by Capability Brown where the villa formed the dominant feature. This sense of dominance has to some extent prevailed with the construction of the 1960s London County Council (LCC) estate immediately surrounding it, as was the original intention. The listed bungalows to the north and west were purposefully kept low in height due to their proximity to the villa. The RPG description specifically mentions the importance of Mount Clare in its landscape setting, *"To the south of the estate the dominant feature in the landscape is Mount Clare. The villa overlooks an unbroken sloped green, with some later obstructive planting having been added. This is an open public space, although it also visually reads as a formal vista up towards the villa, giving it a sense of distinction within the estate. Only the trunk remains of the very large cedar tree that stood to the west of the house until the 2000s, but many other*

mature trees do survive, these being important legacies of the 1770s estate planting that defined boundaries, framed views and formed secluded walks.”

Although the development would not result in a material change to the form, architectural language or scale of the existing buildings, the impact on the Grade I Listed Mount Clare building should be carefully assessed. There is no information setting out how the proposed use of the site would maintain this Grade I listed building. Or, indeed, how the building would be used.

Garnett College (originally) Facilities Building and Student Blocks

It is understood that Mount Clare was compulsorily acquired by the LCC along with the other estates in Roehampton under the Authorisation Procedure Act 1946 and that under the terms of that Act the LCC was required to preserve and restore the eighteenth-century houses. At Mount Clare the intention was to restore the original setting to the house, which entailed the demolition of the Victorian eastern extensions around 1962. Historic records indicate that the site was developed for use by Garnett College after the overall masterplan for Alton West had been constructed. The east wing was replaced with Picasso House, a large modern building to serve as Garnett College's Facilities Building. Behind Mount Clare itself in the garden facing Richmond Park 15 square-shaped student blocks were constructed. Fanning out in two curves and flanking Mount Clare the blocks sit within the landscaped gardens.

These simple cuboid blocks sought to maintain some of the landscape setting of Mount Clare to the south, but they limit views of the building from Minstead Gardens. It is considered that the buildings are harmful to the setting of the listed building, the conservation area and the registered park and gardens, as they funnel views of the listed building rather than allowing an appreciation of its historic more open landscape context. Picasso House is more harmful as it is set further forward than the listed building and is much larger, detracting from the experience of the approach to Mount Clare from the drive to the east. All the buildings also do not share the same quality of architecture and design as the rest of the LCC estate.

The Garnett College development with the placing of the student blocks, Picasso House and the former principal's house (the Lodge) between Mount Clare and the Temple have also interrupted the landscape and visual relationship between these two buildings. Whilst the Lodge was built in a modernist idiom and reflected the diversity of styles of architecture in the conservation area, it has been derelict for some time, and little remains of its structure. There is an opportunity to remove the remains and help to restore the landscape relationship between the Temple and Mount Clare.

A large pond to the southeast of Mount Clare existed prior to 1834 and when the Temple was moved in 1913 the eastern part of the pond was chosen to site the Temple. It is noted that policy RO2 states that a redevelopment of the site should consider reinstating the pond in front of the Temple to improve the biodiversity value of the site (9.34).

Temple in the grounds of Mount Clare

Listed at Grade II*, this Temple was moved from the grounds of Parkstead House in 1913 and was designed by the same architect Sir William Chambers circa 1762-69.

In Greek Doric style it was modelled on an illustration from Stuart and Revett's *The Antiquities of Athens* (1762). The interior has sculptured panels and a frescoed ceiling. The Temple is a strong positive contributor to the conservation area although its current condition sadly diminishes this greatly.

The Temple is located in a hidden, overgrown corner with very little passive surveillance so there are constant security issues. The building recently suffered from damage due to break in. A green, full height cage has been built around the temple to protect it from further damage, which was justified on the basis that a long-term scheme for its maintenance would be provided prior to the expiry of the temporary planning permission (section 3 of this report).

The 1951 Ordnance Survey map shows the relationship between Mount Clare, the LCC bungalows and the Temple, prior to the Garnett College intervention.

As set out above, policy RO2 specifically states that '*Any proposals must consider the future role of the Doric Temple and provide a scheme for its long-term management and maintenance.*'

Registered Parks and Gardens

Landscaping to Alton West Registered Park and Garden was listed Grade II in 2020 for the following reasons:

- Historic interest: influence as a showcase estate by the largest and most influential architect's department in the world in the 1950s, including young architects who went on to have international careers. The estate is regarded as being amongst the most important examples of low-cost mass housing to be built in the period and the landscaping is an integral component of the quality of the overall design.
- Landscape type: as a demonstration of a remarkable juxtaposition of innovative post-war housing with landscapes begun in the mid-C18. The carefully composed mix of distinguished architecture and the integrated elements of earlier landscaping, planting and vistas are of particular interest.
- Design interest: as a manifestation of the architectonic approach inspired by the work of Le Corbusier in its architecture and landscaping which, in competition with the softer Swedish humanist idiom represented at Alton East, was a major influence on the LCC Architect's Department into the 1950s.
- Survival: the landscape survives well, with the estate plan and the principal buildings, views, planting and structural elements all remaining appreciable, albeit with more trees planted and several new features introduced.
- Group value: for the coherent and well-preserved ensemble of listed buildings and public sculptures distributed throughout the estate.

An exceptional element of the Alton West scheme was the opportunity presented by existing C18 landscapes associated with Mount Clare and Downshire House. The LCC Architect's Department considered important views, approaches, mature trees and the topography of the landscape carefully in determining the placement of key buildings within the estate.

The inclusion of the site within the registered park and garden is not highlighted in the

applicant's Planning and Heritage Statement, nor is there any assessment of the impact of their proposals on its significance as required under paragraph 207 of the National Planning Policy Framework.

The site also adjoins Richmond Park, which is a Grade I Registered Park and Garden over circa 1000 hectares in extent. Its significance lies in its origins as a royal deer park since the 14th century and later imparked by Charles I and improved by subsequent monarchs. The proposals will not harm the significance of Richmond Park, as a Grade I listed Registered Park and Garden.

Roehampton Tier II Archaeological Priority Area

The Roehampton Archaeological Priority Area (APA) is a defined region within the London Borough of Wandsworth that highlights the presence of known or potential archaeological heritage assets, especially in its historic core along Roehampton Lane and surrounding the Alton Estate.

Tree Preservation Order TPO 248/99

The trees protected by the TPO cover a number of important individual trees as well as groups of trees that contribute immeasurably to the Historic Park and Garden as well as the setting of the conservation area.

Heritage Impact Comments

It is important to note that Mount Clare and the Temple are said not to form part of the application, yet the proposals would have an impact on the setting of these heritage assets. Mount Clare is a nationally significant heritage asset, being Grade I listed. Further, in the absence of any proposals or any form of maintenance plan as part of the application, there is a risk that it (and the Temple) could be subject to unauthorised access and vandalism. If it is not to be used, then the security arrangements will need to be agreed. In fact, the DAS says that Mount Clare is currently vacant and thus it is assumed that this will remain, putting the building at risk from decay and neglect. Security arrangements should be put in place, but no details are provided.

Further, the Council considers that a scheme which was put forward in line with RO2 (i.e. for a comprehensive mixed-use development of the Site) would be capable of putting forward a scheme which would preserve and enhance the listed assets on site. The failure of this scheme to do so (which is a permanent proposal) is a material failing.

Ultimately, the Council considers that the application has put forward insufficient information for a full heritage impact assessment to be carried out. This is a very significant failing and on the evidence before the Council, it has not been possible to reach a view to conclude whether there would be harm, or indeed what level of harm, would occur to the grade II registered park and garden; the setting of the Temple; and to the setting of Mount Clare House. This is alongside the potential for deterioration and vandalism of the listed assets themselves.

The Council has particular concerns with regards to the rebuilding/replacement of the former Lodge (bungalow) and landscaping proposals.

The DAS refers to the former Lodge (bungalow) as being rebuilt and additional plans were received on the 8/10/2025, which have not been subject to public consultation.

It should be noted that the submitted plans conflict with the submitted Planning Statement, which states (page 16), that the proposed bungalow would comprise five bedrooms. However, four bedrooms are shown in the submitted plans. As well as the general public, Historic England has not had the opportunity to comment on the proposal, which would affect the setting of the Grade II* listed Temple.

No evidence has been submitted illustrating the design of the original Lodge (bungalow) or any photographic evidence. But it appears to the Council that this cannot be rebuilt or replaced without planning permission. It is derelict.

It is considered that the Appellant's proposal to replace the Lodge is likely to harm the significance of the Temple and its setting, however, insufficient information has been provided to verify this, contrary to the requirements of the NPPF. In addition, it is noted that policy RO2 states that *"any replacement of the 1960s buildings should seek to re-assess the landscape significance of the site and seek to inform and re-interpret the principles of the Capability Brown landscape"* and therefore the application fails to consider this policy requirement.

The applicant has not taken the opportunity to re-assess the landscape significance of the site. As advised, the former Lodge 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. Whilst the level of harm on the setting of the Temple and Conservation Area could potentially be judged to be low level, by reason that it is a replacement of an existing structure in a state of disrepair and if the replacement building would have a similar footprint, height, massing and siting, the development would remove the opportunity to reinstate the pond at the Temple which is highlighted as a requirement of site allocation RO2 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 as set out in the site allocation.

It therefore 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 replacement building, for example to provide safe access, which may cause additional concerns with regards to the setting of the Temple.

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 or hard-surfaced base, and these are likely to have a cumulative impact on the historic park and garden, and setting of listed buildings, 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 as the landscape plan is very limited in terms of detail.

Conclusion on Design and Impact on Heritage Assets

The proposed development would fail to respond to the aspirations set out by the site

allocation under policy RO2 of the Local Plan (2023), as it would fail to consider the future role of the Doric Temple and would not provide details of its management and maintenance. Moreover, the proposed rebuilding of the former Lodge would result in a missed opportunity to enhance the significance of the landscaping of the site, as it would not re-interpret the original principles of the Capability Brown landscape, enabling a key connection between Mount Clare and the Temple. A proposal for a comprehensive mixed-use development in line with policy RO2 would be expected to preserve and enhance the listed assets on site in line with the statutory requirements of the Town and Country Planning (Listed Building and Conservation Areas) Act 1990 and relevant local and national heritage policies. The current development proposal fails to do this. Further, the current proposal has the clear potential to lead to additional harm to Mount Clare House and the Temple.

The Council has particular concerns with regards to the proposals for the former Lodge and landscaping including additional physical development on site. There is an insufficient assessment of the proposals on the significance of relevant assets. The proposal has failed to demonstrate that it would respect the significance of the heritage assets within the site and the character and appearance of the conservation area, contrary to policies LP3 and RO2 of the Local Plan (2023) and policies D3 and HC1 of the London Plan (2021) and contrary to s66 and s72 Town and Country Planning (Listed Building and Conservation Areas) Act 1990.

D. Standard of Temporary Accommodation

The application documents are inconsistent in terms of room numbers but indicate that the proposed temporary accommodation would accommodate 264 rooms within 210 units (some being two-bedroom units), with communal internal amenity spaces at ground floor at Picasso House and would retain the existing primary access to each block.

The floorplans show that most of the units would be self-contained and would incorporate ensuite bathrooms and kitchenettes. Further, whilst accommodation would be temporary, it is understood that residents could be in the accommodation for many months or even over one year.

Policy H12 of the London Plan (2021) supports the delivery, retention and refurbishment of supported and specialised housing that meets an identified need. It recognises that the form this takes will vary but states that it should be designed to satisfy the requirements of the specific use or group it is intended for, whilst providing options within the accommodation offer for the diversity of London's population, including disabled Londoners.

Policies D4, D5 and D6 of the London Plan (2021) promote the delivery of good and inclusive design and high quality housing. Amongst other requirements they set out that any form of residential development should have appropriately sized and functional rooms. Policy D7 sets out accessibility requirements.

Further, as set out above, policy LP31 of the Local Plan (2023) provides that the accommodation must be of a high quality and meets relevant best practice guidance for this type of accommodation. A similar provision is found in LP29.

Also relevant is chapter 17 of the Homelessness Code for Local Authorities which addresses suitability of accommodation. Paragraph 17.4 states that *‘Space and arrangement will be key factors in determining the suitability of accommodation. However, consideration of whether accommodation is suitable will require an assessment of all aspects of the accommodation in the light of the relevant needs, requirements and circumstances of the homeless person and their household. The location of the accommodation will always be a relevant factor.’*

Relevant Standards

The Council considers that the standards most relevant to the proposed development are:

1. Wandsworth Minimum Amenities Standards for Houses in Multiple Occupation (‘Wandsworth HMO Standards’); and
2. Setting the Standard – Temporary Accommodation Inspection Service - Guidance Note for STS Inspection Officers and Local Authorities (October 2020)

As has been set out below, the Council considers that this proposal should meet the Wandsworth HMO Standards. However, whichever of these standards applies it is clear that the proposal is ‘substandard’. Consideration of what each relevant standard requires is considered below and then the proposed development is considered against these standards.

Wandsworth Minimum Amenities Standards for Houses in Multiple Occupation

These standards apply to Houses in Multiple Occupation as defined in the Housing Act 2004 Part II and these standards are guidance for the purpose of interpreting schedule 3 of Statutory Instrument 2006 No 373 “The Licensing and Management of Houses in Multiple Occupation Regulations 2006” and Statutory Instrument 2018 No. 616 “The Licensing of Houses in Multiple Occupation (Mandatory Conditions of Licences) Regulations 2018”.

Sections 77, 254-259 of the Housing Act 2004 define Houses in Multiple Occupation. Section 254 provides, as relevant:

‘(1) For the purposes of this Act a building or a part of a building is a “house in multiple occupation” if–

- (a) it meets the conditions in subsection (2) (“the standard test”);
- (b) it meets the conditions in subsection (3) (“the self-contained flat test”);
- (c) it meets the conditions in subsection (4) (“the converted building test”);
- (d) an HMO declaration is in force in respect of it under section 255; or
- (e) it is a converted block of flats to which section 257 applies.

(2) A building or a part of a building meets the standard test if–

- (a) it consists of one or more units of living accommodation not consisting of a self-contained flat or flats;
- (b) the living accommodation is occupied by persons who do not form a single household (see section 258);
- (c) the living accommodation is occupied by those persons as their only or main residence or they are to be treated as so occupying it (see section 259);
- (d) their occupation of the living accommodation constitutes the only use of that accommodation;
- (e) rents are payable or other consideration is to be provided in respect of at least one of those persons' occupation of the living accommodation; and
- (f) two or more of the households who occupy the living accommodation share one or more basic amenities or the living accommodation is lacking in one or more basic amenities.

(3) A part of a building meets the self-contained flat test if–

- (a) it consists of a self-contained flat; and
- (b) paragraphs (b) to (f) of subsection (2) apply (reading references to the living accommodation concerned as references to the flat).

(4) A building or a part of a building meets the converted building test if–

- (a) it is a converted building;
- (b) it contains one or more units of living accommodation that do not consist of a self-contained flat or flats (whether or not it also contains any such flat or flats);
- (c) the living accommodation is occupied by persons who do not form a single household (see section 258);
- (d) the living accommodation is occupied by those persons as their only or main residence or they are to be treated as so occupying it (see section 259);
- (e) their occupation of the living accommodation constitutes the only use of that accommodation; and
- (f) rents are payable or other consideration is to be provided in respect of at least one of those persons' occupation of the living accommodation.

(5) But for any purposes of this Act (other than those of Part 1) a building or part of a building within subsection (1) is not a house in multiple occupation if it is listed in Schedule 14.

...

(8) In this section–

“basic amenities” means–

- (a) a toilet,
- (b) personal washing facilities, or
- (c) cooking facilities;

“converted building” means a building or part of a building consisting of living accommodation in which one or more units of such accommodation have been created since the building or part was constructed;

“enactment” includes an enactment comprised in subordinate legislation (within the meaning of the Interpretation Act 1978 (c. 30));

“self-contained flat” means a separate set of premises (whether or not on the same floor)–

- (a) which forms part of a building;
- (b) either the whole or a material part of which lies above or below some other part of the building; and
- (c) in which all three basic amenities are available for the exclusive use of its occupants.’

Given the wholly inadequate size of the personal washing facilities and cooking facilities contained in most units on site (addressed below) it is considered that the proposal would not amount to self-contained flats.

Further, the HMO Standards themselves define HMOs as follows:

‘a house which consists of one or more units of living accommodation not consisting of a self-contained flat or flats; and

- (a) the living accommodation is occupied by persons who do not form a single household (see below) and is occupied by those persons as their only or main residence or they are to be treated as so occupying it (see section 259 Housing Act 2004)
- (b) their occupation of the living accommodation constitutes the only use of that accommodation
- (c) rents are payable or other consideration is to be provided in respect of at least one of those persons’ occupation of the living accommodation; and
- (d) two or more of the households who occupy the living accommodation share one or more basic amenities namely a toilet, personal washing facilities, or cooking facilities; or the living accommodation is lacking in one or more basic amenities.’

It is considered that the sharing of facilities by residents means this definition would be met.

It is also clear that the Wandsworth HMO Standards also cover hostel type HMOs, which are defined as: “short duration accommodation for people with no other permanent place of residence. Not hotels or bed and breakfast accommodation where amenity standards are set within the document ‘Setting the Standard for Temporary Accommodation in London’”.

Meanwhile “Bedsit type HMOs” are “a HMO where accommodation is not self-contained and some facilities are shared, such as bathrooms and/or toilets, but individual rooms are let separately and contain some facilities for exclusive use of the occupier, such as cooking facilities.”

If it were the case that the proposal did amount to self-contained flats then the relevant standards to apply would be national space standards. On any measure it is clear that the size of each flat would be well below the required standards.

It is noted that the management of the building may exempt the proposed development from HMO status under the Housing Act 2004 according to the terms of schedule 14 of that act. However, at present it is unclear how this building would be managed and by whom. As such, it is unclear whether such an exemption would apply.

The LPA considers that even if the proposed use does not meet the HMO definition, for whatever reason, the Wandsworth HMO standards are a highly material consideration as they apply to a similar use being units of living accommodation which is likely to be the only or main residence of occupants, where there are some shared facilities. Further, residents within the proposed development may be housed for many months, a year or more.

The Wandsworth HMO standards include requirements with regards to bathrooms, kitchens, living rooms and bedrooms.

It is noted that bathrooms must be adequately sized and laid out and must be suitably located in relation to the living accommodation, not more than one floor distant from the occupancy rooms.

The standards require a minimum of 7sqm or 11sqm for a kitchen/diner for every five people sharing one set of facilities. In hostel accommodation this may be for every ten persons but no single kitchen shall provide facilities for more than 20 persons. The kitchens must be suitably located, not more than one floor distant from the occupancy rooms. There are requirements with regards to the size of fridge/freezers, ovens/grills, power sockets, worktops and storage cupboards.

Living rooms are required to be a minimum of 11sqm for every five people using it (or 18sqm for a combined kitchen and living room). In hostels an additional 1sqm is required for each person in occupation in excess of 11.

Bedrooms of below 6.51sqm are not suitable. Bedrooms of 6.51m-10.22sqm are suitable for a single occupier and a bedroom of 10.22sqm to 15sqm is suitable for a maximum of two occupiers. However, this is only where a separate living room is

provided which is not a kitchen or kitchen dining room.

Where no separate living room is provided which is not a kitchen or kitchen/dining room then bedrooms of 0-10.22 sqm are not suitable. And a single occupancy bedroom should be 10.22sqm to 15sqm and a double occupancy room should be 15sqm or larger.

Where kitchen facilities are provided within a bedroom then a minimum additional floor area of 3.5sqm should be added to minimum bedroom sizes.

Setting the Standard – Temporary Accommodation Inspection Service - Guidance Note for STS Inspection Officers and Local Authorities (October 2020)

These standards have been developed by the 'Setting the Standard' (StS) scheme which is a centralised provision of accommodation and inspection scheme used by homeless persons within Local Authorities in London, for securing accommodation for the temporary placement of homes for people throughout the capital. As such, the review of the standards is considered appropriate.

However, the StS standards are explicit that they 'are not a replacement for those which have been adopted locally, by Local Housing Authorities (LHAs) including Houses in Multiple Occupation (HMOs) Standards, and they defer to those standards. Further, the STS standards state that they 'cannot be considered as suitable for long term housing for homeless persons'. It is considered therefore that considerable caution should be taken with regards to these because stays of up to a year are considered long term.

Key parts of the StS standards state that:

- Kitchens for exclusive use of a household should have a minimum floor area of 4.5sqm and includes a list of required kitchen facilities
- Shared kitchens should have one set of the kitchen facilities for every five households or single residents, must be reasonably located not more than one floor distance from the rooms they serve
- Shared kitchens have space standards for floor areas. Each set of shared kitchen facilities is required to have a minimum floor area of 6.0sqm and a maximum of two sets of cooking facilities should be provided in a kitchen with a minimum floor area of 11.0sqm.
- 3 in 1 kitchenettes are required to incorporate a fridge, sink and two hobs. They are required to have a worktop of 1000mm x 600mm and storage cupboards with a minimum capacity of 0.4m³.
- Minimum sizes for showers are 800mm x 800mm housed in a shower room with adequate drying space (1.7m).
- In addition to the health, safety and amenity requirements, the premises may offer additional facilities, that can include laundry room, children's play areas, doctor's visiting rooms etc.

- Appendix 1 includes space standards for 'nightly-rate temporary accommodation for homeless persons'. They are an 'absolute minimum' and where properties are subject to licensing, the licensing standards adopted by the LAH will take precedence.
- Providers/managers are required to ensure that the crowding and space standards are not contravened.
- Table 2 sets out sleeping rooms containing cooking facilities:

| Table 2: Sleeping rooms containing cooking facilities Floor Area of Sleeping Room | Maximum Number of Persons |
|--|----------------------------------|
| Less than 10.2 m ² | Nil |
| Not less than 10.2 m ² | 1 |
| Not less than 13.9 m ² | 2 |
| Not less than 18.6 m ² | 3 |
| Not less than 23.2 m ² | 4 |
| Not less than 27.9 m ² | 5 |
| No more than 5 persons should be required to occupy any room | |

The Proposed Development

Having regard to the standards set out above, it is clear that the proposed development is not high quality and does not meet either the Wandsworth HMO Standards or StS.

Blocks A-E

The typical internal layout of these blocks has been examined. Although paragraph 4.8 of the Planning Statement states that the proposed units within these blocks would range between 12.00 sqm and 20.00 sqm, the proposed floor plans illustrate smaller rooms that would range between 6.00 sqm and 10.00 sqm. The proposed floor areas would therefore fail to meet either the Wandsworth HMO standards or the StS standards.

The proposed layout would not provide additional living rooms and would not accommodate communal kitchen dining areas. In the absence of communal amenity spaces within the blocks and given that the proposed small single rooms would only contain approx. 6.00 sqm in floor area, the proposed standard of accommodation is considered substandard whether the Wandsworth HMO standards or StS standards apply.

The communal facilities in Picasso House are inadequate to affect this conclusion. They are not large enough to accommodate all of the households on site and,

furthermore, they are not sufficiently close so as to be accessed by each household within blocks A-E. Residents in these blocks would need to walk a fair distance, potentially in poor weather, to access these communal amenity areas. This concern is exacerbated by fact that the people requiring temporary accommodation may well face other challenges (including possibly in relation to mobility – please see Inclusive Design comments below). The proposed layout of the communal facilities, at a considerable distance from Blocks A to E, is considered inappropriate and contrary to the guidance set out by the Wandsworth HMO Standards and STS both in terms of its location and size.

It is also unclear whether occupants of the accommodation blocks would have sufficient space to store food and cooking equipment and to prepare food, particularly given the limited space in the accommodation block units themselves (as set out above).

Furthermore, the proposed showers would not meet the minimum requirement of 0.80m x 0.80m when assessed against the minimum standards under the 'Setting the Standard' (StS) (2020). As such, the proposed temporary accommodation within these blocks would result in a cramped form of living accommodation and would be conflict with policy H12 of the London Plan (2012) and the above-mentioned guidance.

Picasso House

Within Picasso House, in relation to the dwellings, in planning terms, these are considered as individual dwellings, which is how they are laid out as part of the submitted 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.

The units provided are proposed to be temporary accommodation within Picasso House, therefore, this could be provided on the basis of HMO accommodation, providing for different households within the dwellings. It is likely that the dwellings would accommodate two-bed, three-bed, four-bed and six-bed cluster rooms with kitchen/dining areas with a slightly more generous size (ranging between 9.00 sqm for single rooms and 21.00 sqm for double rooms with access to WC and kitchen dining areas), the proposed kitchen and dining areas would fail to meet the Wandsworth HMO amenity standards in that the kitchen/dining areas would fall short of the 11.00 sqm requirement per five occupants with additional sqm per additional occupier. It is also noted that the proposed shared kitchen areas would fall short of the minimum requirement for 5 households, as one kitchen is proposed for four double bedrooms and two single bedrooms (at first floor level), which would also have no minimum of two sets of cooking facilities.

With regards to the size and capacity of the proposed communal amenity areas, it is noted that the six bed clusters would accommodate a maximum of 10 people and the proposed kitchen/dining area would only contain 13.00 sqm in floor area. Moreover,

a three-bed cluster within the first floor would have a capacity to accommodate five people and the proposed kitchen/dining area would only contain 9.00 sqm. Although additional communal kitchen floorspace alongside a common room is provided at ground floor level, the proposed communal kitchen would contain 52.00 sqm and would provide a very limited collective kitchen area, considering that this block would have the capacity to accommodate approximately 50 people. As noted, some single bedrooms (as annotated on the floor plans) exceed 12.00 sqm in floor area and could therefore have the capacity to accommodate two people. As such, the proposed provision of communal kitchens would also fail to meet the minimum standards under StS due to the overall limited floor area.

The former Lodge (Bungalow)

The applicant has provided details of the proposed internal layout for the Lodge following lodging of the appeal. Details of the proposed elevations of the replacement building were submitted on the 08/10/2025 and these illustrate brickwork, with no details of windows, doors and roofs shown in the submitted plans. The submitted plans also conflict with the submitted planning statement, as the plans illustrate four double bedrooms (and the planning statement refers to five bedrooms). However, the proposed four bedrooms and two communal amenity spaces with kitchen facilities would appear acceptable and consistent with the guidelines set out by the Wandsworth Minimum Amenities standards for Houses in Multiple Occupation 2020, considering that the building would accommodate an acceptable living environment with adequate communal amenity spaces.

Inclusive Design

With regards to wheelchair accessible rooms and inclusive design, policy H12 of the London Plan (2021) sets no minimum requirements for temporary hostel accommodation. However, it is expected that any form of temporary accommodation meets the 10% building regulations requirement for M4 (3) 'wheelchair user dwellings', set out by policy D7 of the London Plan (2021). Although the policy generally limits the threshold for new build dwellings, the proposed floor plans label only one single room that would contain 9.00 sqm in floor area as wheelchair accessible at the ground floor within Picasso House.

The single wheelchair accessible room is very constrained and would not have access to an ensuite WC. The layout of this room would not provide sufficient space for wheelchair use, due to the limited size and space to manoeuvre. Additionally, the application does not address the reasons why additional wheelchair accessible rooms are not being proposed within the floor plans, to meet the aspirations set out by policy D7 of the London Plan (2021).

When application 2024/0183 was under consideration, the Council's specialist housing and occupational therapist advised that the 2021 census found more than twice the percentage of people identified as homeless reported as being disabled (44.1%), when compared to the population in England and Wales (17.5%). In response to the current application the Occupational Therapist reiterated that it has been well documented and researched that there are likely to be a higher number of disabled residents in the proposed client group. This therefore suggests a greater

need for accessible accommodation and therefore the provision of one single wheelchair accessible bedroom is not considered acceptable.

Conclusion on Quality of Accommodation

Overall, the quality of the temporary accommodation is not supported in terms of design, layout, size and inclusive design. Given the limited and sub-standard quantum of internal amenity space and how the internal communal areas would be wholly concentrated within Picasso House, these would not be practically accessible for all residents.

In addition, due to the constrained size of individual rooms, particularly within Blocks A-E, and considering the fact that the layout within these residential blocks would not provide an acceptable communal living environment that would support the limited size of each individual room, the proposed quality of accommodation is not considered acceptable and is contrary to the guidance under the Wandsworth Minimum Amenities standards for Houses in Multiple Occupation 2020 and also StS. Furthermore, no details with regards to an acceptable provision of wheelchair accessible rooms are provided within the submitted plans or Design and Access Statement.

As such, the proposed temporary living accommodation would be substandard and would be contrary to the guidelines and requirements of the above-mentioned policies H12, D6 and D7 of the London Plan (2021) policies LP29 and 31 of the Wandsworth Local Plan and the Wandsworth Minimum Amenities standards for Houses in Multiple Occupation 2020.

E. Impact on Amenity

The NPPF (2024) states that planning policies should ensure that new development is appropriate for its location considering the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.

Policy D6 of the London Plan (2021) states that the design of development proposals should respect amenity of surrounding residential dwellings, in a way that any impact on daylight/sunlight and visual outlook is minimised. In addition, policy LP2 of the Local Plan states that development proposals must not adversely impact the amenity of existing and future occupiers or that of neighbouring properties or prevent the proper operation of the proposed or neighbouring uses.

There are no concerns with regards to harm on sunlight/daylight, overshadowing or visual outlook provided to neighbouring residents. However, given the form of temporary accommodation being proposed and potential increase in the number of residents, any impact on neighbouring residents with regards to noise, disturbance, privacy and safety should be reviewed, by reason of the additional activity that could result within the site.

Due to the above and subject to appropriate management of the site, the development

would not be considered in principle an un-neighbourly form of development and would therefore be consistent with policy D6 of the London Plan (2021) and policy LP2 of the Local Plan (2023) with regards to impact on residential amenity of neighbouring properties.

F. Highways and Transport

Policy T1 of the London Plan (2021) states that proposals should support delivery of the Mayor's strategic target of 80% of all trips in London to be made by foot, cycle and public transport by 2041. The policy requires development proposals to make the most effective use of land in a way that reflects its connectivity by use of existing and future transport links, walking and cycling routes to ensure that any impact on London's transport network is mitigated.

The key considerations with regards to transport are assessed as follows:

Trip Generation

The site is currently unoccupied, and no lawful use has been demonstrated. Therefore there is no scope for assessing manual vehicular turning counts and other types of travel survey to obtain an accurate baseline number of trips per mode. As such, the Council's Transport team investigated university accommodation trip generation surveys on TRICS that are as similar as possible to the current site in terms of location, levels of local household car ownership, public transport accessibility and number of bedrooms. This is on the basis that there is no lawful use of the site.

Given the sui generis use class for temporary hostel accommodation, the Transport Officer used data from TRICS to compare the impact of the proposed rooms on all modes of transport, as a way to estimate the number of trips per mode to assess the likely impact of the change of use on each mode. As advised by the Transport Officer, the proposed change of use would result in a net increase of 14 two-way private vehicular trips between 07:00 and 19:00, a net increase of 17 two-way bus trips in the same period, 51 two-way trips, 17 two-way underground trips, 28 two-way pedestrian trips and 10 cycle trips. The development would therefore have no severe impact on the operation of all modes of transport in the traditional peak period of 08:00 – 09:00 and 17:00 – 18:00.

Even if the lawful use of the site has not been demonstrated, the Council does not consider that the likely number of trips generated by the development is likely to result in a severe impact.

Paragraph 116 of the National Planning Policy Framework (2024) states that *“development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios”*.

There is no official definition of severe impact, but regarding the impact of additional private vehicular trips created on the transport network by development, Appendix A of the Government Guidance on Transport Assessment (DfT, 2007) states that manual classified turning counts and micro-level traffic modelling should be

completed at particular links or junctions on the highway that would incur a net increase of 30 two-way vehicular trips or more in the AM and/or PM weekday peak hours. As set out above, the proposed development would not create this number of net additional private vehicular trips on the network so we can assume that the highway will still be able to operate safely if this development is implemented.

Regarding measuring the severity of net impact on other modes of transport, Transport for London (TfL) have tools to measure the net impact of development on bus services relative to current and future forecast bus loading, but, given the small gross increase in the number of bus trips in the AM and PM weekday peak hours, and the fact that the Danebury Avenue / Minstead Gardens bus stop is served by two regular bus services that both provide 6 – 7 buses per hour, the Transport Officer considers that it is extremely unlikely that the proposed development would create a severe impact on the operation of the bus network.

Vehicular Parking

The site has a Public Transport Accessibility Level (PTAL) of 1b and is not in a controlled parking zone (CPZ). There is no maximum off-street vehicular parking set out in Chapter 10 of the London Plan for sui generis land uses. Policy T6.1 (part E) of the London Plan (2021) states that *“large-scale purpose-built shared living, student accommodation and other sui generis residential uses should be car-free”*. This position is slightly different to Wandsworth Local Plan Policy LP51 (parts D and E), which states that car-free residential development will be required where the PTAL is 4 or higher, the site is located in an Opportunity Area and if the appropriate minimum number of disability friendly parking spaces are provided in accordance with the London Plan and any subsequent amendments.

The application states in the Design and Access Statement that the development would provide 19 to 21 off-street vehicular parking spaces. As advised by the Transport Officer, the three western-most spaces parallel to and north of Mount Clare House would be unusable because these would impede the ability of large vehicles to turn within the site. However, there is scope to park 18 cars on the site safely, so the site would effectively have 18 off-street vehicular parking spaces. In the Design and Access Statement, the application states that four accessible units at Picasso House would be combined with a total of 11 bedrooms. No details of these bedrooms as accessible units have been provided, but assuming that the bedrooms in the accessible units would be reserved for people with accessibility needs, the application would need to provide up to 8 spaces for blue badge holders on the first occupation of the site, with a plan to show how this can be increased to 11 spaces, subject to demand.

Past surveys have identified that there were 79 spaces on the adopted highway that were available for use on 17 October 2024 and 88 on 22 October 2024. On this basis, the Transport Officer has used MSOA level from data from the Census of 2021 to ascertain the number of cars owned per household living in flats with at least one person in them aged 17 or over to estimate the likely number of cars owned by occupants of the current and proposed land uses. As noted, 279 occupants of the proposed temporary accommodation are likely to own 84 vehicles, and if 18 are subtracted, the overspill parking would be 66 vehicles. As advised, the overspill parking of up to 66 vehicles could be safely absorbed.

The Transport Officer recommends a pre-occupation vehicular parking management plan condition, which must set out where parking bays will be marked out, with details of disabled spaces to meet the criteria of policy T6.1 of the London Plan (2021).

Cycle Parking

The application proposes 106 long-stay cycle parking spaces for 279 residents. Whilst this is a large increase compared to what it is on site now, the application would need to provide 0.75 spaces per bedroom to meet the minimum standards set out in Table 10.2 of the London Plan (2021), giving a required total of 210 cycle parking spaces. As such, a planning condition requiring details of cycle parking requirements is recommended, prior to commencement of the development.

Pedestrian and Cycle Access to the site and Picasso House

Currently, there is a stepped structure to the east of and attached to Picasso House which provides a flight of stairs to the first floor of Picasso House containing 25 steps in a southerly direction. The stairs are 2.6m wide and there is a ramp of about 1.2m in width between the eastern building wall of Picasso House and the stepped structure. This ramp provides access to the basement/under-croft. East of the stepped structure is a retaining wall and then a maintenance margin which is 0.5m wide. The current highway boundary is the back or western edge of the maintenance margin. The proposed structure on the applicant's submitted site plan appears to be overrunning the highway boundary south of the vehicular access.

Borough Engineers at the LPA advised that the proposed structure as shown would not be accepted, because a maintenance margin is needed to ensure the kerb is haunch to support the carriageway. Also, the carriageway is 4.8m wide at this location. Details of the proposed stepped structure and the retaining wall it would need must be secured by a pre-commencement planning condition and the whole of the proposed structure must remain within the applicant's site. Details of the proposed stepped structure and the retaining wall it would need are therefore recommended as a pre-commencement condition, which should remain within the application site.

Travel Plan

The site would accommodate vulnerable members of the community. A travel plan statement has not been submitted with the application. As such a travel plan is recommended by condition to reduce the number of single occupancy car trips and ensure that the opportunities to travel by sustainable modes of transport are taken up in accordance with Para. 115a of the NPPF (2024).

Construction Management Plan

Given the extensive internal works to deliver the proposed layout, the development would increase the number of vehicular trips by vehicles, such as HGVs, during the construction phase of the development. A Construction Management Plan is therefore recommended by condition, to ensure that road users are kept safe throughout the construction process.

Conclusion on Transport and Highways Impact

Overall, the Transport Officer raises no objections in terms of impact on the highway network or transport capacity. Whilst details of cycle store with regards to layout, quantum and accessibility would need to be reviewed, the Transport Officer considers that this could be assessed at condition stage, to ensure that these are properly sheltered and secured. As such, no reasons for refusal are recommended on grounds of transport and highways capacity, and the development would not conflict in this regard with policies T1, T2, T6, T6.1 of the London Plan (2021) and policies LP50 and LP51 of the Local Plan (2023).

G. Waste Management

Policy SI7 of the London Plan (2021) and policy LP10 of the Local Plan promote a more circular economy that improves resource efficiency and encourages waste minimisation and prevention through the re-use of materials. In addition, policy SI8 of the London Plan (2021) states how development proposals should plan for identified waste needs and measures to reduce waste, in line with the circular economy principles. Furthermore, policy LP2 of the Local Plan requires any form of development to provide sufficient waste and recycling storage facilities on site unless there are exceptional circumstances, in which case offsite provision will be sought. Waste and recycling storage facilities should support the separate collection of dry recyclables, food waste and residual waste and should be provided in accordance with the Council's Reuse, Recycling and Waste SPD (July 2025) which replaced the previously adopted Refuse and Recyclables in Developments SPD (2014) after the application was submitted.

The application contains no details of operational waste management or strategy, and the Council's waste strategy manager considered that further consideration is required with regards to arrangements for waste storage and collection. However, these details could be reviewed as a condition. In the absence of an objection from the waste strategy team, the development would not be contrary to policy SI7 of the London Plan (2021) and policy LP2 of the Local Plan (2023) and any details with regards to movements, loading activities and detailed design of refuse stores could be assessed at condition stage, if the application was acceptable.

H. Environmental Impact

Policy LP13 of the local Plan seeks for resource-efficient development proposals that recognise the increasing pressure on resources due to population growth and environmental stress. Developments should seek to mitigate degradation and pollution in all its forms, including noise, vibration, lighting, water quality and habitat loss.

The submitted Ecological Report (dated December 2024) provides details of the ecological surveys that have been carried out and confirms that there are no habitats that would be directly affected by the proposed change of use. Although there would not be an adverse impact on local wildlife, policy RO2 of the Local Plan (2023) seeks to promote the introduction or enhancement of stag beetle habitats within the site, in consultation with Natural England. In this instance and in the scenario that the appeal is allowed, a condition to secure an ecological conservation management plan to include details of the measures taken to survey, preserve and protect wildlife including the existence of stag beetles is recommended.

The submitted documents provide no details of measures to address impact with regards to generator/flues, mechanical plans, sound insulation measures, water efficiency and pre-completion noise testing schedules. However, no concerns are raised in principle with regards to environmental health, and these considerations could be assessed at condition stage, in the event the application was successful at appeal.

I. Energy and Sustainability

Policy SI2 of the London Plan (2021) sets out a CO₂ reduction target for regulated emissions only of 40% against Building Regulations 2010 and 35% against Building Regulations 2013, using SAP 10 carbon factors as calculated using the GLA Energy Reporting Tool. Where it is demonstrated that the zero-carbon target cannot be fully achieved, shortfall mitigation should be provided, in agreement with the borough, through a financial contribution for the borough's carbon offset fund.

An energy strategy was submitted on the 08/10/2025, after the appeal against non-determination was lodged. Although the application was validated without this requirement, it was noted that the assessment on any energy strategy would be subject to the change of use approach, which follows the appeal decision dated July 2025. The application is a major application and therefore should be consistent with policy SI2 of the London Plan (2021) that requires a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the development.

The submitted energy report has not been published, and no consultations have been carried out to verify the proposed strategy. However, the strategy suggests 28% savings to Part L 2021 Building Regulations but provides no details on how the application would address the failure to meet zero carbon emissions requirements under policy SI2 of the London Plan (2021).

Although the submitted Planning Statement addresses this requirement and notes that the proposal would only seek to use existing buildings for temporary accommodation, the proposed retrofitting of the building blocks alongside the replacement of the dilapidated former Lodge (bungalow) building would involve material forms of development that would go beyond the retention of existing structures, as stated in the Planning Statement. The development should therefore set out CO₂ reduction targets for regulation emissions and any shortfall should be secured by a financial contribution, as advised by the LPA to the applicant in writing on 8th August 2025. The submitted energy report states that no further savings can be achieved, by reason of site constraints and viability considerations. However, no details to substantiate this justification have been provided and therefore the development is not considered acceptable from a sustainability perspective and would be contrary to policy SI2 of the London Plan (2021).

In addition, no details with regards to the working condition of the current fabric of the buildings have been provided and due to the dilapidated condition of the former Lodge (bungalow) building, further details for energy reduction that include options to adapt or modify ventilation and lighting systems are expected, due to the scale and nature of the development.

Due to these considerations, the development would result in a failed opportunity to improve the efficiency and sustainability of the existing buildings and therefore the proposed energy strategy is not acceptable in principle, as it would not be consistent with the requirements set by policy SI2 of the London Plan (2021).

J. Trees and Landscaping

Policy D8 of the London Plan (2021) requires development proposals to explore opportunities to create new public realm where appropriate, which should be well designed, safe, accessible, inclusive and attractive. Landscaping proposals, including planting and surface materials should be of good quality and sustainable. Additionally, lighting should be well-designed to minimise light pollution and reduce intrusive forms of illumination.

The submitted Landscape Plan (Drawing No. 0101) provides details with regards to cycle parking, street furniture and play equipment. Whilst these details are welcomed, further details in respect of a landscaping strategy would be required by condition, in the event that the application is considered acceptable. The submitted landscape plan makes reference to cycle parking stands adjacent to each block, which could have a cumulative harmful impact on the historic park and gardens around each building. This has been addressed under heritage above.

The proposed scheme should be seen as an opportunity to introduce good quality soft and permeable landscaping features, to support new habitat and achieve an acceptable score of urban greening, in compliance with policy G5 of the London Plan (2021) and therefore considered that the landscaping strategy would need to be reviewed, to ensure that it responds to the significance of the landscaping features and principles of the site. Furthermore, the landscaping strategy should re-assess the significance of the site with regards to landscape and trees. This re-assessment has not been carried out, considering that the landscaping features have been included as a key material form of development under the application.

With regards to the submitted play space, the application provides no details of potential temporary occupiers for the site and therefore the expected population of children cannot be calculated to allow a detailed assessment of the proposed provision in terms of size, accessibility and quality of play areas. However, the Local Planning Authority would not consider that these issues would warrant a refusal of the planning application, as these specifications could be addressed at condition stage.

K. Safety and Security

Policy D11 of the London Plan (2021) sets out requirements to ensure all forms of development incorporate acceptable levels of safety and security measures to ensure that buildings remain resilient to emergency.

Although no details containing measures to tackle crime prevention have been clearly provided, specifications on measures to improve surveillance, CCTV coverage, access control systems and strategies to prevent anti-social behaviour could be dealt with by condition, in the event the application is successful at appeal.

With regards to fire safety, policy D12 of the London Plan 2021 requires the

submission of a Fire Strategy for all major forms of development, which should incorporate measures to minimise risks of fire. Whilst Section C of the submitted Planning Statement mentions the requirements of policy D12, no third-party and independent report has been submitted, which should be assessed to review the fire safety systems, fire prevention measures, and accessibility for firefighting.

Although these details could be dealt with by condition in the event the application is successful at appeal, these should be also considered as part of a management strategy for the temporary accommodation, to ensure a high standard of fire safety in accordance with policy D12 of the London Plan 2021.

L. Community Engagement

The NPPF (2024) states that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. The Wandsworth Raising the Bar: Early Community Engagement Guidance for Applicants (May 2024) is part of the Local Plan and encourages developers to consult neighbours and/or local amenity bodies before they submit a planning application. It states that the LPA cannot insist on a pre-application consultation. However, developers of major applications are advised to consider carrying out or commissioning a structured form of consultation at this stage, based on officer advice about whom the LPA is likely to consult.

Developers will then be able to submit a consultation statement with the application that sets out who has been consulted and how, any responses they received and if any changes were made to the scheme as a result. In this case, the application is a major application due to the amount of floorspace that would change use and community engagement will need to be addressed within the application.

The planning statement submitted with the application includes a section referencing the need to provide a statement of community involvement. It recognises that major applications should be supported by a statement setting out how the applicant has complied with the requirements for pre-application consultation set out in the local planning authority's adopted statement of community involvement. This should demonstrate that the views of the local community have been considered in the formulation of development proposals although it is apparent that the applicant has only engaged with the Council's Housing team and the Putney Society which is not considered proportionate to the nature of the development proposed.

M. Conclusion and Planning Balance

In accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004 it is necessary to consider whether the proposal is in accordance with the development plan and, if not, whether there are material considerations which indicate that a decision should be taken other than in accordance with the development plan.

The LPA considers that the proposal does not accord with the terms of the development plan. In particular, for the reasons set out above, the proposal conflicts with a number of policies. A summary of this is set out below.

The principle of the development is not supported. The development is not consistent

with the aspirations set out by the site allocation under policy RO2 of the Local Plan (2023), which allocates the whole site for development. It would not maximise housing delivery and would therefore conflict with Chapter 5 of the NPPF (2024), which encourages local planning authorities to boost the supply for homes. Additionally, the development would not consider the future role of the Doric Temple and its long-term management and maintenance, as required by the site allocation policy RO2.

Whilst it is recognised that there is a need for accommodation to be provided all across London to prevent and reduce homelessness, it is not considered that the proposed type of development is appropriate within the context of the site, in particular having regard to the low transport accessibility of the site. Further, the proposal would lead to the over-concentration of single-household accommodation and would fail to provide a mixed and balanced community. The development is contrary to policy D3 of the London Plan (2021), as it would fail to follow a design-led approach that optimises the capacity of the site, including its site allocation.

The principle of providing temporary accommodation, being a form of specialist housing for vulnerable people, and housing with shared facilities, is also not considered to be in accordance with the requirements of policies LP29 and LP31. The Council's concerns under these policies relate to the over-concentration of single-household accommodation, the poor accessibility of the site, the poor quality of the accommodation and the failure to provide affordable housing.

With regards to affordable housing, the development would not seek to meet any of the LPA's long-term need for affordable housing and the applicant has not provided any justification for why it should not provide a policy-compliant contribution for this.

With regards to the quality of the accommodation, the development would fail to deliver an acceptable standard of temporary accommodation with regards to the size and layout of a number of rooms and would also fail to consider inclusive design requirements and an acceptable provision of wheelchair accessible units. As such, the proposed quality of accommodation would not be fit for purpose and would result in a cramped form of accommodation that would not be functional. Moreover, the proposed size, layout and quality of the internal amenity areas would not meet appropriate standards, considering that the communal kitchens would only be positioned within Picasso House and would not be integrated to other habitable rooms within the other residential blocks. Thus, the relevant requirements of policies LP29 and 31 would not be met in this regard, alongside other policy requirements: D4-7 and H12 of the London Plan; and policy LP27.

Turning to heritage, 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 and the Registered Park and Garden. 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. On the basis of the information before the Council it is considered that the proposal could lead to harm to heritage assets as a result of the proposed rebuilding/replacement of the Lodge and also the landscaping. 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 would therefore be contrary to 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.

The development is acceptable under transport consideration and any specifications with regards to cycle parking, travel plan, car parking management, refuse and construction logistics could be dealt with by way of condition.

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.

Therefore, for the reasons outlined in this report it is considered that the proposal contravenes a number of development plan policies and it contravenes the development plan as a whole.

It is therefore necessary to consider whether there are other material considerations which might justify a decision contrary to the terms of the development plan.

The principal benefit which the Appellant puts forward for its proposal is meeting an acute need for temporary housing in the borough. The LPA agrees that the meeting of some of this need is a benefit which attracts significant weight, however, as set out in the body of this report, consisting primarily of single bedrooms, it is not considered that the proposed development responds to the specific needs for family accommodation within the borough.

The Appellant also states that re-using existing buildings is a benefit of the proposal, this is consistent with paragraph 84 of the NPPF which supports the re-use of underutilised or disused buildings and the, the LPA agrees that, in principle, this is a benefit of the application, although it is noted that the proposal does not adequately address the Temple and Mount Clare as part of this.

The LPA considers that there will also be some economic benefits arising from the proposal, these will include those which are related to the building works on site and the economic activity of those who would be housed in the proposed development. It is also understood that five full time jobs would be created by the proposal. However, it is not considered that these benefits will be significant and therefore carry limited weight.

Whilst these benefits are acknowledged, the LPA does not consider that they are sufficient to justify the grant of planning permission contrary to the development plan in this case.

Further, as set out above, 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 is likely to be caused by the proposal. The proposal can therefore not be supported.

Considering the proposal against the three limbs of sustainability in NPPF paragraph 8, it is considered that the proposal is not sustainable development.

With regards to the economic objective, whilst there would be some economic benefits it is considered that this proposal is not in the right place given the fact that it would clearly not contribute to a mixed and balanced community.

With regards to the social objective, whilst the meeting of some of the Council's temporary accommodation need would be a social benefit the manner in which the accommodation is proposed to be provided with a significant overconcentration of single-person accommodation in one place would not support 'strong, vibrant and healthy communities.' The heritage harm means that the proposal is not well-designed. It has not been demonstrated that the proposal will have sufficiently accessible services to meet the health, social and cultural wellbeing of residents. Further, it is not considered that the standard of accommodation, which will be cramped and fail to provide sufficient communal facilities which are easily accessible for all residents, meets the social objective of sustainability.

With regards to the environmental objective, it is not considered that the appeal proposal has demonstrated the promotion of biodiversity net gain nor proposed mitigation measures to respond to the impact the proposed development would have upon species that might be present on the site and so this weighs against the scheme and is not considered to be an environmental benefit. It is considered that the failure of the proposed development to show how it would mitigate climate change weighs against the scheme. Further, the heritage harm also weighs against the proposal.

Paragraph 125(c) of the NPPF provides that substantial weight should be given to the value of using suitable brownfield land within settlements for homes and other identified needs and that proposals for which should be approved unless substantial harm would be caused and paragraph 125(d) supports the development of under-utilised land and buildings especially if this would help to meet identified needs for housing. Whilst the LPA recognises that substantial weight should be given to the use of brownfield land, it is considered that, for the reasons set out in this report, the proposal fails to meet the requirements of a number of policies which weigh against this.

Overall, and in conclusion, it is considered 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, the appeal scheme would fail to optimize the development of the site and deliver affordable housing, and would not provide an acceptable quality and standard of accommodation. In addition, the proposed development fails to consider appropriate sustainability measures that would be required and does not provide a mixed form of development or make provision for the future role of the Doric Temple or the reinstatement of the pond.

Overall, it is considered that the proposal is not in accordance with the development plan and material considerations do not indicate that permission should be granted.

RECOMMENDATION: REFUSE

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 failed to demonstrate 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.

Case Officer: Pedro Rizo

Date: 27/10/2025



APO/DAPO:

Date: 27/10/2025