



Appeal Decision

Inquiry held on 20-23, 27 May and 19 June 2025

Site visit made on 27 May

by **M Bale BA (Hons) MA MRTPI**

an Inspector appointed by the Secretary of State

Decision date: 11 July 2025

Appeal Ref: APP/H5960/X/25/3358768

Mount Clare Campus, Minstead Gardens, Roehampton Gate, London SW15 4EE

- The appeal is made under section 195 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant a certificate of lawful use or development.
 - The appeal is made by NTA Planning LLP against the decision of the Council of the London Borough of Wandsworth.
 - The application ref 2024/2089, dated 13 June 2024, was refused by notice dated 22 October 2024.
 - The application was made under section 192(1)(a) of the Town and Country Planning Act 1990 (as amended).
 - The use for which a certificate of lawful use or development is sought is for temporary accommodation.
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Decision

1. The appeal is dismissed.

Applications for costs

2. Applications for costs have been made by the Council of the London Borough of Wandsworth (“the Council”) against NTA Planning LLP (“the appellant”), and by the appellant against the Council. These applications will be the subject of later Decisions.

Preliminary Matters

3. The Inquiry sat for 6 days in person. All evidence was given on affirmation. Closing submissions were presented in writing only.
4. The description of the use for which a certificate of proposed lawful use or development (“LDC”) is sought (hereafter, for convenience, “the proposed use”) was the subject of some considerable discussion at the Inquiry. The application form describes the use simply as ‘Sui Generis – Hostel’. The covering letter, referred to in the application form adds further information, referring to a proposed use as ‘temporary housing’ for the purposes of providing temporary accommodation for people on a Council’s emergency list.
5. The covering letter makes frequent reference to hostel accommodation, but this is mainly in the context of that being the appellant’s position of the existing lawful use. It is suggested therein that the proposed use as ‘temporary accommodation’ would fall within that use.
6. During the Inquiry, the Council put the position that ‘temporary accommodation’ was too wide a description, because it could encompass a great many things and could take place in a variety of buildings including hotels, hostels, houses in

multiple occupation, and dwellinghouses. Despite having agreed on the first day of the inquiry that the use could be described as temporary accommodation, the appellant laboured the point that the proposal was for a hostel, partly because of their belief that the building already was a hostel and that was not changing.

7. Following the first day clarification of use, the Council claimed that injustice would arise if I were to make a decision on anything other than a use described simply as 'temporary accommodation'. However, while narrowing the use in this way would limit one of the Council's reasons for denying an LDC – in essence, that the proposed use was too wide to be pronounced lawful – injustice would not arise if I were to do so:
8. While the covering letter makes a clear proposal for temporary accommodation, it is also abundantly clear on the application form that a certificate is sought for a hostel use. Thus, the application documents together provide a clear picture of what is proposed. Moreover, the oral evidence did cover the potential for different forms of temporary accommodation and for different types of hostel. Accordingly, the use for which an LDC is sought can be more precisely described as 'hostel for temporary accommodation', without causing injustice. I have considered the appeal on that basis.
9. Therefore, even if temporary accommodation could be provided in a multitude of residential settings, it would be clear what was being certified on any certificate. If the appeal were successful, despite the various theoretical room layouts shown, I also see no reason why the site operator would be able to lawfully provide dwellinghouses, houses in multiple occupation, or some other form of accommodation. In the event that the site was not operated as a hostel, whether that was as a consequence of the tenure, management arrangements, building layout, provision (or not) of communal facilities, or any other factor, the Council would be able to serve an enforcement notice if it appeared to them that there had been a breach of planning control.

Reasons

10. Mount Clare Campus ("the Site") includes a number of buildings. Mount Clare House is a Grade I listed building that once stood in extensive grounds. Around it are 15 almost identical accommodation blocks in 5 groups of 3, each with 12 bedrooms arranged over two floors, shared bathroom and kitchen facilities. There are garages, a separately listed 'temple' and a very dilapidated house.
11. There is also Picasso House, a large 3 storey building. The lowest, subterranean floor includes small storage spaces, a plant room and workshop. The ground floor contains various large rooms, and the first floor is a series of accommodation units of varying numbers of bedrooms, each with shared bathrooms and kitchens within the units. The accommodation units are accessed via external stairs and an uncovered walkway between the units.
12. Collectively, all of the above sits within landscaped grounds with a single vehicular point of access from Minstead Gardens that passes the front of Mount Clare House. There is agreement between the main parties that the entire Site should currently be deemed one single planning unit.
13. Other than Mount Clare House and the Temple, the Site is believed to have been developed in the 1960s to provide accommodation for Garnett College that was

relocating from elsewhere in London. Hereafter, it is this, 20th Century development to which I refer when describing development of the Site. There are no planning permission documents, but various contemporary reports describe the then proposed and actual development of the Site alongside a nearby site at Downshire House.

14. The documents describe the Site and the Downshire House sites together in the context of developing a training college with accommodation. The teaching space was to be provided at Downshire House and the accommodation at the Site. It appears that Mount Clare House was to be used for student common rooms and the like and, from post construction reports, this appears to be what happened.
15. Despite their dual consideration, linked purpose and single end user, however, it is clear that two separate uses were proposed for the two sites. While the accommodation at the Site was clearly intended to be used in conjunction with the teaching at Downshire House, the Mount Clare site as a whole had an entirely different purpose. There is no particular evidence of teaching activities taking place at the Site, the whole being laid out and arranged for living. Moreover, there is a report indicating that the surrounding area was 'zoned' for residential uses at the time and that the educational proposals for the Downshire House site would conflict with that, whereas the accommodation proposals for the Site would not.
16. The Mount Clare and Downshire sites are around half a mile apart, with intervening uses (which may have been parkland, or may have included residential units depending on when the wider, surrounding, Alton Estate was laid out). Given this separation, and the clearly distinct activities at each location, I find it more likely than not that the Site and the Downshire House site should be treated as two separate planning units from their outset, even if they were subject to some form of single consenting process.
17. It is unclear how permission was given for development of the Site, or indeed the rest of the surrounding Alton Estate. The simple absence of historic documents is insufficient to confirm that there was some sort of deemed consent given. This is because it seems probable that, even in that scenario, there would have been some final sign off procedure and at least some document saying that the development could proceed. In any event, the actual permitting route is of little importance because the documents are absent, so to understand what may have been permitted, it is necessary to make inferences from the available reports and documents.
18. There are a number of architectural drawings showing the layout of the Site and it seems that that development now at the Site accords with them. They appear to be typical planning layout drawings and so are a good indication of what was being proposed and, probably, was ultimately permitted.
19. The 15 almost identical accommodation blocks are described on the drawings as 'Hostel Units'. Picasso House is described as 'Staff & Dining Block' and the, now dilapidated, bungalow as 'Principal's Residence'. It is primarily on the back of this that the appellant contends the 15 blocks were permitted for use as a hostel without restriction.
20. It is uncontroversial that the term 'hostel' is not a term of art, as per *Commercial and Residential Property Development Co. Ltd v Secretary of State for the Environment & Another* [1981] 80 LGR 443. Indeed, as per *Ipswich BC v Fairview*

Hotels (Ipswich Ltd) [2022] EWHC 2868 (KB), the appellant accepts the Council's proposition that there are, in fact, a 'spectrum of hostel uses'.

21. Hostels can, therefore, accommodate various 'classes' of people and, as considered in *Commercial and Residential Property*, that is frequently defined with an additional adjective – student hostel, nurses' hostel, youth hostel, for example. In present times, descriptions such as 'student hostel' are somewhat out of fashion being more usually referred to as student accommodation. Nevertheless, Miss Cooley, for the appellant, explained that, from the 1940s, hostels were created to provide affordable accommodation for working aged people. It is, likely, therefore, that the term hostel was in common parlance when the development was originally considered and would have been deemed an appropriate term to describe the accommodation proposed.
22. *Commercial and Residential Property* acknowledges a situation that a hostel without a qualifying adjective could potentially be used by any class of person, for any length of stay. The question is whether the 'Hostel Units' on the drawings for the development of the Site are such unrestricted units.
23. The historic record includes a number of reports and documents. In the main, they discuss the Mount Clare and Downshire House sites together, and in that context it is clear that, while no educational activities were to take place at Mount Clare, the development was intended to provide accommodation for students, alongside the teaching facilities at Downshire House.
24. Mr Sahota, for the appellant, suggested that greater weight should be given to planning documents. He said that he considered these to be those with a specific reference to Town Planning, such as a Town Planning Committee report, or the drawings that appeared to be planning drawings. That was because other documents, such as those speaking about education or funding might use terms more freely.
25. Of these, a report of 19 February 1959 by the London County Council ("LCC") architect to an education and Town Planning sub-committee referred to development for hostel purposes. However, even in that planning report, terms are used somewhat freely and later the report refers to the provision of accommodation for 240 students 'in the halls of residence', and clearly describes the second element of the proposal as being for the provision of 'hostel accommodation for training college students'. The ultimate recommendation was (so far as relevant) to approve plans for 'training college and students' hostel purposes'.
26. On 9 March 1959, a LCC Town Planning Committee minute notes that outline proposals for the development of Downshire House and Mount Clare for training college and students' hostel purposes were approved. On 16 May 1960 the LCC Town Planning Committee minutes record a recommendation for approval of a scheme for a training college and hall of residence.
27. It appears that the Council of the London Borough of Wandsworth's ("WBC") Town Planning Committee were consulted on the proposals on 8 July 1960. A report to that committee contains un-headed columns that generate some uncertainty over the meaning of their contents, but the subsequent report referred simply to hostel buildings. However, it appears that LCC were responsible for the decision-making process, and their documents refer to halls of residence or student hostels. In any

event the WBC report was describing a training college and ancillary buildings with the proposals for the two sites related to one another.

28. Thus, the terms used by LCC – notably including the minute recording approval of the outline proposals – consistently refer to either a student hostel or student accommodation. It is that description rather than a label on the plan that is more likely to define the scope of any permission or deemed consent given. While, where a broad use is permitted, it is usually necessary to place any restriction on that use with planning conditions (and there is no evidence of any in this case), it has not been shown that such should apply where, like here, a clearly qualified sui generis use is involved.
29. It is relatively uncontentious that the evidence then appears to indicate that the development was carried out, the Site was occupied as accommodation for Garnett College, and this continued for a period of time. Therefore, in the absence of any actual record of the permission or consent sought or given, I find it more likely than not that the development of the Site was permitted for a student hostel rather than an unqualified one.
30. The only available evidence suggests that there was some associated staff accommodation on the first floor of Picasso House, with ancillary communal facilities/common rooms provided in Mount Clare House and the ground floor of Picasso House.
31. It is then understood that the Site was sold to the Battersea Churches and Chelsea Housing Trust and there is no substantive evidence as to their use of the site. However, there is nothing to suggest that it moved away from the previous use by Garnett College, particularly as the 15 accommodation blocks have subsequently been used for student accommodation by the University of Roehampton, whose main campus is within walking distance of the Site. That was, in effect, a resumption or continuation of the previous known use.
32. However, there is very little clarity over what the University of Roehampton were doing on the rest of the Site. Residents of the accommodation blocks would probably have needed some communal facilities, such as a laundry and, potentially, some form of common room. Signage remaining within Picasso House is indicative of such past uses.
33. At the Inquiry, there was some discussion as to the Picasso House basement uses. There are some small spaces and a plant room as well as a workshop. The workshop contained work benches, saws, drills, and other tools. Given its small size, the appellant's suggestion that it could be used entirely in the maintenance of the Site is a reasonable one.
34. However, a 2014 photograph from the London Parks and Gardens website shows a totem sign to the front of Mount Clare House. Care should be taken when relying on a single photograph of the outside of the building at one snapshot in time. Nevertheless, the sign appears to announce the occupation of Mount Clare House by the University of Roehampton Department of Property & Facilities Management. It describes a meeting room on the lower ground floor, alongside the environment team. On the ground floor, the conferencing & hospitality team, accommodation office and finance team are listed. On the first floor a visitor reception, university head of security, projects team, university domestic services

and university ground & waste management team, as well as another, illegible, team are listed.

35. The names of the various teams on the sign are of a type often aligned with administrative functions. The sign supports Mr Curtin's description of Mount Clare House as having evidence of a previous office use. It also aligns with local resident Mr Mills' recollection of visiting a former lecturer of his, now involved in what he described as the 'greening of the university', in an office there, and Mr Sahota's understanding that there were once administrative functions there.
36. The University of Roehampton may have very many buildings available to house its administrative functions. However, Mount Clare House would have been one such building at its disposal, able to house a department with specific responsibilities. There is no substantive evidence from the University of Roehampton about how they used the site and Mr Sahota confirmed that he has not asked them about their use. The university's own letter of 13 March 2025 makes no detailed reference to Mount Clare House or Picasso House and blandly states that 'the buildings at Mount Clare have been used for a number of purposes over the years in addition to student accommodation'. No further detail is given.
37. While some functions may have related to activity at the Site, it seems rather unlikely that whole teams of the type described would be needed to provide support ancillary only to the accommodation blocks, or related to works only at the Site. Indeed, while he did not know how the office space had been used, or whether it would have been ancillary to the accommodation blocks, Mr Curtin confirmed that he had not needed to provide space for such facilities in other student accommodation projects with which he had been involved.
38. At the site visit, it was evident that large parts of the ground floor of Picasso House also appear to be in use for storage. Some of the items appear to be kitchen appliances and the like that may well be for use in the ongoing refurbishment of the accommodation blocks at the Site. Other items appear to include university-branded paraphernalia relating to the control of Covid-19 that could have been used in connection with the accommodation units at the Site, or elsewhere. However, other parts are laid out as filing rooms (labelled as University of Roehampton storage) and there is no substantive evidence about what this relates to.
39. In addition, one corner of Picasso House has been refurbished and laid out as office/consultation space for the Citizens' Advice Bureau ("CAB"). Google Street View photographs show that it has been at the site since 2019 and there is no particular evidence that it was an ancillary support service specifically for the residents of the accommodation units at the Site. Indeed, there is currently no residential occupation of the site and the CAB office use has clearly continued beyond vacation of the accommodation blocks, given that it was open and operating at the time of my site visit.
40. I note here that very little is known about the principal's residence that is described in some early reports and shown on the plans of the development. Evidently, something was built in broadly that location, but the present-day remains are barely recognisable as a dwelling. At some point – seemingly, from the condition of the building, some time ago – it ceased to be used such that it would not be contributing to the overall use of the planning unit.

41. With regard to the above, I conclude that the evidence makes it more likely than not that during the University of Roehampton's occupation, uses have been brought onto the Site that are related to wider university functions (both the office uses of Mount Clare House and storage uses of Picasso House), and also to private business operations (CAB) within Picasso House.
42. At this time, those spaces 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.
45. There are likely to be some similarities in the way that the buildings are occupied. They include that rooms would be occupied by unconnected individuals, sharing any communal facilities provided, and they would likely occupy those rooms on licence rather than a tenancy agreement. Lengths of occupation may vary considerably, but the University of Roehampton has confirmed that most students were offered licences of 39-51 weeks. There also seems to have been some short-term letting for other commercial purposes if rooms were available, although the extent of this is uncertain.
46. Historically, Garnett College may have run courses of varying lengths with several different cohorts, differing from the conventional undergraduate pattern. The accommodation could have been occupied by mature or post-graduate students, as it probably was when used by Garnett College. The demographic profiles of University of Roehampton students may be broadly comparable to those presenting as homeless. While the appellant's evidence suggests that there could be improvements in noise and disturbance effects with the proposed use, Mr Mills' evidence is that he has not recalled any such problems from the existing use of the site, so the uses are likely to be comparable in that regard.
47. Mr Curtin's evidence suggests one possible solution for refurbishment of the accommodation. It shows en-suite bathrooms and kitchenettes being provided within the individual rooms, leading to a greater degree of self-containment. However, that is probably no different to some modern student accommodation and would, thus, be a consequence of refurbishment rather than a change of use. Likewise, an alteration of existing shared kitchen and bathroom spaces into bedroom spaces and resulting increase in occupancy could equally occur in the

existing use. Miss Cooley explained how required rooms layouts and facilities would be broadly comparable for existing and proposed users.

48. While general statistics reveal that homeless people have higher levels of disability and chronic healthcare needs, Miss Cooley explained that this is skewed by the inclusion of the long-term or entrenched homeless. Given her experience, I have no reason to doubt her position that these are not the types of people likely to be accepted into temporary accommodation. Although the proposed occupiers are not tightly defined, her position that hostels providing temporary accommodation are likely to accommodate a wide range of people from across the social spectrum is credible. As the buildings at the Site are unsuited to a large number of physically disabled people, there is no reason why there should be a material difference in the general healthcare requirements of previous and proposed occupants.
49. Both parties instructed transport experts to assess whether the change of use would have a material effect on the highway network. Conventional analysis of trip generation has been challenging, because the commonly used TRICS database does not cover hostels providing temporary accommodation. Data for sites that may contain similar uses, such as local authority flats, are from surveys in incomparable locations. Available data for student accommodation also relates to sites with different accessibility credentials and parking levels. While consideration of whether this results in over- or under-estimates can be made, I find that TRICS analysis is a wholly unreliable method on which to compare likely trip generation of the two uses at this site.
50. Both parties also attempted to compare likely parking demand. This is also an imperfect exercise because the census data underpinning car ownership information groups various categories of accommodation together. For the appellant, Mr Lewis believes that both uses should fall within the same category and he, therefore, anticipates that there would be an increase in car ownership based only on an increase in available rooms.
51. For the Council, Mr Marshall has also accounted for the increase in room numbers. However, he has also applied a weighting to his figures. That is based on the number of equivalent housing units that student accommodation and communal housing solutions are expected to provide to general housing land supply. While a novel approach, I can see that this might be instructive of the number of people likely to occupy the units, when compared to dwellinghouses. However, as there is no substantive evidence about relative car ownership patterns between dwellinghouses and student or communally occupied units, it has not been shown that the weighting would be accurate.
52. Moreover, the weighting has not been applied to dwellinghouses. Rather it has been applied to data for flats containing one person aged 17 or over. In both existing and proposed scenarios the accommodation would, in effect, be providing accommodation for a single person. While both student accommodation and temporary accommodation for the homeless might operate differently to flats falling within Class C3 of the Town and Country Planning (Use Classes) Order 1987 (as amended), they may already be a part of the chosen data set (in the absence of a more suitable one within the census data). It is not clear, therefore, why that data set would need to be weighted in the way that it has been.

53. Ultimately, the evidence base supporting the weighting is poor and so the results may be unreliable. I favour Mr Lewis' approach of using the same data set for both, especially as that accords with Miss Cooley and Mr Sahota's experience that those in temporary accommodation would usually have low levels of car ownership. Any uplift in car ownership would, therefore, be dependent on the ultimate refurbishment proposals of the accommodation. The change of use itself would cause no material change.
54. In any event, car ownership can only be a proxy for potential private vehicular trip generation. In the absence of a reliable comparison methodology for other modes, far more instructive of any difference between uses would be a qualitative analysis of the behaviour of the occupants.
55. Students resident at the site would have shared a common endeavour in their academic studies. They would, in the main, travel most frequently to the university campus where there are a range of educational, social and wellbeing facilities available to them. However, while residents in the proposed use might have a variety of endeavours spread across a wider area of London, this accommodation is detached from the university campus and, therefore, in existing and proposed scenarios, residents would generally be leaving and returning to the accommodation individually or in small groups at various times throughout the day.
56. The University of Roehampton has confirmed that many of its students are engaged in part time work. They may also attend work placements and internships elsewhere in London. As such, although their main reason for living at the site would be education, they could reasonably be expected to place other travel demands on the road network and public transport. The lack of shared endeavour, therefore, would not create a material difference in the way that the site was used.
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.

60. Some of the rooms at the Site are large enough to be shared by two people. However, there is nothing to suggest that through its time providing accommodation for students they were not, in the main, occupied by single people. Although some mature students might have children, there is nothing to suggest that children have previously been accommodated at the Site. In the proposed use, the room sizes would not change and they would continue to be most suitable for single occupancy. Nevertheless, Mr Curtin's suggested room layout could include some two-room units. While I appreciate that such is hypothetical and not indicative of a final proposal, such rooms might be capable of providing accommodation for adults with one or two children.
61. Miss Cooley confirmed that particular care is required when accommodating children for safeguarding reasons and it was unlikely that they would be placed in a hostel with other adults. However, she also acknowledged that, given the dispersed buildings at the Site, some could be assigned for different categories of people. While it is not currently the appellant's intention, such may change and it seems likely, therefore, that the proposed use could reasonably accommodate some children in the future, should demand dictate. In addition to other community facilities and services, this would place new demands on schools, parks and other children's services.
62. Furthermore, while the accommodation at the Site may have been occupied for various periods and, to some extent, throughout the year, the nature of student accommodation is that it is most likely to have been occupied by a succession of cohorts for consistent periods of time. Thus, the vast majority would likely arrive and depart together. That is contrasted with the, materially different, uncoordinated individual arrivals and departures of temporary accommodation residents. Miss Cooley's position that tenure or licencing arrangements would not dictate this behaviour does not change this probable behaviour pattern of most people.
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.
64. For the reasons given above, I conclude that the Council's refusal to grant a certificate of lawful use or development for use of the Site as a hostel for temporary accommodation is well-founded and that the appeal should fail. I will exercise accordingly the powers transferred to me in section 195(3) of the 1990 Act (as amended).

M Bale

INSPECTOR

APPEARANCES

FOR THE APPELLANT:

Andrew Gillick BSc MBs MSc

He called

Anna Cooley¹

Daniel Curtin BSc (hons) M Arch Dip Arch ARB RIBA

David Lewis MSc MCIHT

Mandip Sahota BA DipTP MRTPI

FOR THE COUNCIL:

Victoria Hutton, Counsel for the Council

She called

Will Marshall BA MA MSc

Siri Thafvelin BA MA AssocRTPI

INTERESTED PARTIES:

Mark Doody (local resident)

George Mills (Chair of Swaythling House Residents Association)

¹ Anna Cooley has various relevant qualifications, but the manner in which they should be cited is not clear from her proof of evidence.

DOCUMENTS SUBMITTED TO THE INQUIRY

ID1	Extracts from Homelessness live tables at 06 May 2025
ID2	Extracts from University of Roehampton website at 30 April 2025.
ID3	Wandsworth Homelessness Health Needs Assessment 2023
ID4	Technical housing standards – nationally described space standard 2015
ID5	Opening statement on behalf of the appellant
ID6	Opening submissions on behalf of the Council
ID7	Copy of Mr Doody's oral submission to the Inquiry
ID8	Site visit route plan
ID9	Closing submissions on behalf of London Borough of Wandsworth
ID10	Closing statement on behalf of the appellant
ID11	Response to additional case-law on behalf of London Borough of Wandsworth
ID12	Appellant response to the Council's response to additional caselaw
ID13	Costs application on behalf of London Borough of Wandsworth
ID14	Application for costs on behalf of appellant
ID15	Response to [appellant's] costs application on behalf of London Borough of Wandsworth
ID16	Appellant's response to Council application for costs
ID17	Reply to the appellant's response to the [Council's] costs application on behalf of London Borough of Wandsworth
ID18	Appellant's final comments on the application for costs