

**From:** Mandip Sahota <ms@ntaplanning.co.uk>  
**Sent:** 16 January 2026 16:16  
**To:** John Legg <John.Legg@planninginspectorate.gov.uk>; Siri Thafvelin <Siri.Thafvelin@RichmondandWandsworth.gov.uk>  
**Cc:** Julie Papouskova <jp@ntaplanning.co.uk>; Helen Skinner <HELEN.SKINNER@planninginspectorate.gov.uk>; Janet Ferguson <Janet.Ferguson@richmondandwandsworth.gov.uk>  
**Subject:** RE: 3371729 Mount Clare - Amendments to Barry's Proof of Evidence

Dear Mr Legg,

Thank you for this clarification, which is most helpful.

With regard to schedule, I note that the current schedule has the evidence of David Lewis, for the Appellant, on Friday 23<sup>rd</sup>. Based on the email below, this indicates that the timings may change and possibly his evidence brought forward to Thursday. I just wanted to note that Mr Lewis has advised that he would not be available on Wednesday 21<sup>st</sup> and so if his evidence could avoid that day (which it looks as though it would anyway), it would be appreciated.

Kind regards,

**MANDIP SINGH SAHOTA MRTPI**

**MANAGING PARTNER**



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**From:** John Legg <[John.Legg@planninginspectorate.gov.uk](mailto:John.Legg@planninginspectorate.gov.uk)>

**Sent:** 16 January 2026 15:03

**To:** Siri Thafvelin <[Siri.Thafvelin@RichmondandWandsworth.gov.uk](mailto:Siri.Thafvelin@RichmondandWandsworth.gov.uk)>; Mandip Sahota <[ms@ntaplanning.co.uk](mailto:ms@ntaplanning.co.uk)>

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**Subject:** RE: 3371729 Mount Clare - Amendments to Barry's Proof of Evidence

Good afternoon,

The Inspector is currently assessing correspondence regarding the Inquiry timetable. The response of the Council dated 12 January 2026 and the changes to the Council's Heritage Proof of Evidence, particularly in respect of Nil use, was not before the Inspector in drawing the timetable up and the witnesses on baseline. In light of this response, the Inspector does not consider the necessity for evidence to be examined on baseline and will be revising it by omitting the appearances of the Council and appellant's witnesses, as well as adjusting timing in light of the Council Committee meeting on the Tuesday. In the Inspector's opening, the Inspector will offer parties the opportunity to comment on this if they so wish. However, it does appear based on the recent correspondence that this revision to be made to the Inquiry timetabling will be acceptable to both parties. Importantly, though, the Inspector would be grateful if the Baseline Statement of Common Ground can be completed and ready for submission on Tuesday.

Kind regards

John



Planning  
Inspectorate

**John Legg (He/Him)**  
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**From:** Siri Thafvelin <[Siri.Thafvelin@RichmondandWandsworth.gov.uk](mailto:Siri.Thafvelin@RichmondandWandsworth.gov.uk)>

**Sent:** 16 January 2026 13:34

**To:** John Legg <[John.Legg@planninginspectorate.gov.uk](mailto:John.Legg@planninginspectorate.gov.uk)>; Mandip Sahota <[ms@ntaplanning.co.uk](mailto:ms@ntaplanning.co.uk)>

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**Subject:** RE: 3371729 Mount Clare - Amendments to Barry's Proof of Evidence

Official

Dear Mr Legg

Further to the Inspector's publication of the inquiry timetable, the LPA notes that the hearing of my (Siri Thafvelin's) evidence is listed for between 14.15 and 16.00 on Tuesday, 20 January.

While the Inspector may be considering whether evidence is to be heard on the issue of the baseline in light of recent correspondence, the LPA notes that the Council Chamber is not available after 3PM on Tuesday, 20 January, due to a committee meeting, as discussed at the Case Management Conference (please see paragraph 33 of the Inspector's Case Management Conference Summary attached). The LPA would be grateful if proposed timings could be re-considered, in light of this.

Kind regards,

**Siri Thafvelin**

Principal Planning Officer | Strategic Development Team

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**From:** John Legg <[John.Legg@planninginspectorate.gov.uk](mailto:John.Legg@planninginspectorate.gov.uk)>

**Sent:** 15 January 2026 12:08

**To:** Mandip Sahota <[ms@ntaplanning.co.uk](mailto:ms@ntaplanning.co.uk)>; Siri Thafvelin <[Siri.Thafvelin@RichmondandWandsworth.gov.uk](mailto:Siri.Thafvelin@RichmondandWandsworth.gov.uk)>

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**Subject:** RE: 3371729 Mount Clare - Amendments to Barry's Proof of Evidence

Good afternoon,

I have asked the Inspector.

Kind regards

John

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**From:** Mandip Sahota <[ms@ntaplanning.co.uk](mailto:ms@ntaplanning.co.uk)>

**Sent:** 15 January 2026 11:57

**To:** Siri Thafvelin <[Siri.Thafvelin@RichmondandWandsworth.gov.uk](mailto:Siri.Thafvelin@RichmondandWandsworth.gov.uk)>; John Legg <[John.Legg@planninginspectorate.gov.uk](mailto:John.Legg@planninginspectorate.gov.uk)>

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**Subject:** RE: 3371729 Mount Clare - Amendments to Barry's Proof of Evidence

Dear Siri,

Thank you for your email which I note has been received after the earlier email from Mr Legg on baseline (attached).

Mr Legg, before we respond to the LPA on the below, can you advise whether any of the comments below would now supersede the comments from the Inspector and his desire to hear limited evidence on baseline, or whether the matter can now be considered moot.

Kind regards,

**MANDIP SINGH SAHOTA MRTPI**  
MANAGING PARTNER



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**From:** Siri Thafvelin <[Siri.Thafvelin@RichmondandWandsworth.gov.uk](mailto:Siri.Thafvelin@RichmondandWandsworth.gov.uk)>

**Sent:** 15 January 2026 10:42

**To:** Mandip Sahota <[ms@ntaplanning.co.uk](mailto:ms@ntaplanning.co.uk)>; Legg, John <[john.legg@planninginspectorate.gov.uk](mailto:john.legg@planninginspectorate.gov.uk)>

**Cc:** Julie Papouskova <[jp@ntaplanning.co.uk](mailto:jp@ntaplanning.co.uk)>; Helen Skinner <[helen.skinner@planninginspectorate.gov.uk](mailto:helen.skinner@planninginspectorate.gov.uk)>; Janet Ferguson

Official

Dear Mandip,

**Baseline**

To assist the inquiry and further to the LPA agreeing that the question of the baseline is now considered moot for the purposes of the conclusions reached by its expert witnesses, we write to confirm that the following relevant paragraphs in the proof of Mr Barry Sellers are withdrawn.

The LPA continues to reserve its position as to costs in relation to the Appellant's approach to the question of the baseline and lawful use of the site prior to agreeing that the position can now be considered moot. As it relates to the substance of the Appeal, the LPA would be grateful of the Appellant's confirmation that it is agreed that it will no longer be necessary to hear evidence from Siri Thafvelin or Christopher Aquilina. The LPA nevertheless reserves its position as to the necessity of calling Ms Thafvelin as a witness for the purposes of costs.

*Barry Sellers' Proof of Evidence*

- p.35, paras. 5.2 to 5.3 – these are withdrawn as moot.
- pp.46 to 47, paras. 5.39 to 5.40 – these are withdrawn as moot.
- p.56, para. 6.13 – this is withdrawn as moot.

**Works to the Lodge**

Having further considered the Inspector's ruling of 11 December in relation to works to the Lodge (i.e. that the inquiry will proceed on the basis that there will be no external alteration to the Lodge, no operational development, and no demolition and replacement), the following additional paragraphs are withdrawn from the proof and summary proof of Mr Sellers:

*Barry Sellers' Proof of Evidence*

- pp.42 to 43, paras. 5.27 to 5.28 – these are withdrawn.
- p.43, paras. 5.30 to 5.32 – these are withdrawn.
- p.49, para. 5.44, 1<sup>st</sup> bullet point – this is withdrawn.
- p.50, para. 5.46 – this is withdrawn.
- p.56, para. 6.10 – this is corrected to confirm that the word "Lodge" should be replaced with the word "Temple".
- p.56, para. 6.11 – this is withdrawn.

*Barry Sellers' Summary Proof of Evidence*

- p.5, para. 5.3 – this is withdrawn.
- p.5, para. 5.5, 1<sup>st</sup> bullet point – this is withdrawn.

For the avoidance of doubt, Mr Sellers has confirmed and will of course address in oral evidence that the withdrawal of these paragraphs (in relation to both the baseline and the Lodge) does not affect his overall conclusions as to heritage harm.

Kind regards,

**Siri Thafvelin**

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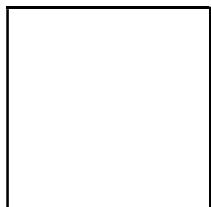
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