

**From:** Mandip Sahota <ms@ntaplanning.co.uk>  
**Sent:** 16 January 2026 17:52  
**To:** Siri Thafvelin  
**Cc:** Julie Papouskova; Janet Ferguson; John Legg  
**Subject:** Re: Mount Clare Matters - further information  
**Attachments:** image001.gif; image002.png

Hi Siri,

The relevant dimension are set out in Dan Curtin's proof.

Kind regards,

**MANDIP SINGH SAHOTA MRTPI**  
**MANAGING PARTNER**

**T. 020 7636 3961**  
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**M. 07738 718068**  
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On 16 Jan 2026, at 17:49, Siri Thafvelin  
<Siri.Thafvelin@richmondandwandsworth.gov.uk> wrote:

Official

Hi Mandip,

Thank you for your response and apologies if it wasn't all clear but the first query was about all of the rooms in Blocks A-E, not just the larger ones.

For clarity, are you saying that the larger rooms are 10.4sqm, each with a 1.6sqm shower room (as opposed to the 1sqm the drawings indicate them to be)?

Kind regards,

**Siri Thafvelin**  
Principal Planning Officer | Strategic Development Team  
Serving Richmond and Wandsworth Councils  
Tel. No: (020) 8871 6899  
[planning@wandsworth.gov.uk](mailto:planning@wandsworth.gov.uk)  
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**From:** Mandip Sahota <ms@ntaplanning.co.uk>  
**Sent:** 16 January 2026 17:41  
**To:** Siri Thafvelin <Siri.Thafvelin@RichmondandWandsworth.gov.uk>  
**Cc:** Julie Papouskova <jp@ntaplanning.co.uk>; Janet Ferguson <Janet.Ferguson@richmondandwandsworth.gov.uk>; John Legg <John.Legg@planninginspectorate.gov.uk>  
**Subject:** RE: Mount Clare Matters - further information

Hi Siri,

With regard to the rooms mentioned in blocks A-E, I confirm that the rooms are 12sqm in total, with the shower room illustrated occupying 1.6sqm of the room, as per Dan Curtin's proof.

With regard to the transport statement, this was prepared by Mode and it is unlikely that they are going to amend their report before next week given they are no longer instructed on this project. I note that the Transport Statement is not going to be an approved document (condition 2), and therefore its update to reflect the proposed cycle storage is not considered essential for next week's proceedings. The parties agree what the proposed capacity is, and these are illustrated on the planning drawings which would be secured by condition (2), and I note that a further condition is also proposed to secure cycle parking details.

Kind regards,

**MANDIP SINGH SAHOTA MRTPI**  
**MANAGING PARTNER**

<image001.gif>

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**From:** Siri Thafvelin <Siri.Thafvelin@RichmondandWandsworth.gov.uk>  
**Sent:** 16 January 2026 12:21  
**To:** Mandip Sahota <[ms@ntaplanning.co.uk](mailto:ms@ntaplanning.co.uk)>  
**Cc:** Julie Papouskova <[jp@ntaplanning.co.uk](mailto:jp@ntaplanning.co.uk)>; Janet Ferguson <[Janet.Ferguson@richmondandwandsworth.gov.uk](mailto:Janet.Ferguson@richmondandwandsworth.gov.uk)>  
**Subject:** Mount Clare Matters - further information  
**Importance:** High

Official

Good afternoon Mandip,

I am following up the LPA's previous requests and ask you to please respond to the queries of 22 December (see attached) and 7 January (see below). I have repeated these below for ease of reference.

The 7 January email stated:

Following review of the Appellant's submissions, and particularly the proof of Daniel Curtin, the LPA would be grateful if the Appellant could **confirm the precise proposed dimensions of the units in accommodation blocks A to E.**

The planning application drawings (and many of the drawings included in Mr Curtin's proof) indicate room floor areas of either 6m<sup>2</sup> or 10m<sup>2</sup> in these blocks, while Mr Curtin's proof at page 24 indicates that the larger, ensuite rooms will be 10.2m<sup>2</sup>. It would be helpful if the Appellant could **also clarify whether for the larger rooms the 10m<sup>2</sup> measurement (assuming that this is accurate) incorporates the area of the ensuite toilet/shower rooms (which the drawings indicate are 1m<sup>2</sup>), or whether these have been measured separately (as appears to be the case). In any case, could the Appellant also confirm the precise proposed dimensions of the ensuite toilet/shower rooms?**

The 22 December email stated:

The 146 cycle parking spaces, as advised below, is consistent with the amended plans. **However, the Transport Statement needs to be updated, to ensure that this number is in accordance with the cycle stores within the updated plans, the Planning Statement and the Design and Access Statement.**

Kind regards,

**Siri Thafvelin**

Principal Planning Officer | Strategic Development Team

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**From:** Janet Ferguson <[Janet.Ferguson@richmondandwandsworth.gov.uk](mailto:Janet.Ferguson@richmondandwandsworth.gov.uk)>

**Sent:** 07 January 2026 09:32

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

**Cc:** Julie Papouskova <[jp@ntaplanning.co.uk](mailto:jp@ntaplanning.co.uk)>; Siri Thafvelin

<[Siri.Thafvelin@RichmondandWandsworth.gov.uk](mailto:Siri.Thafvelin@RichmondandWandsworth.gov.uk)>; Pedro Rizo

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**Subject:** Mount Clare Matters

**Importance:** High

Official

Dear Mandip,

Further to exchange of proofs and noting the approaching deadlines ahead of the inquiry, we write to clarify various points arising in the appeal.

### **Witnesses, Time Estimates, and Inquiry Timetable**

Noting the 9 January (Friday) deadline for submission by the parties of time estimates for examination of evidence, we should be grateful if you could confirm who the Appellant will be calling as its witnesses at the inquiry, and the intended method by which they will give evidence (i.e. by formal examination or by round table discussion), subject to the Inspector's view on this.

As this stage, the LPA's position remains that it will call three witnesses:

1. Nik Smith (planning) (formal examination);
2. Barry Sellers (heritage) (formal examination); and
3. Dave Worth (suitability of and need for temporary accommodation) (round table).

Subject to progress with the baseline statement of common ground by 9 January, considered further below, the LPA may also call Siri Thafvelin as a witness in relation to the lawful use of the site. To assist the Inspector, the LPA suggests that both parties provide time estimates for examination of Ms Thafvelin and Christopher Aquilina, in the event that both are ultimately called to give evidence.

On a related note and given that it appears that the Appellant may now call up to six witnesses, we should be grateful if you could confirm whether the Appellant considers that a sufficient number of days has been allocated for the inquiry and, if not, how many further days will be required. This will assist the LPA in confirming the availability of the inquiry venue and relevant members of the LPA inquiry team.

### **Baseline Statement of Common Ground**

As set out in our email of 23 December providing Siri Thafvelin's proof of evidence, we trust that this document assists with the Appellant's preparation of a first draft baseline statement of common ground. A final version has of course been requested by the Inspector by 9 January, so we should be grateful if you could provide a draft document for consideration as soon as possible.

### **Inquiry Site Visit Route Map**

The Inspector has requested a site visit route map by 9 January. The LPA proposes that the same route as for the certificate of lawfulness inquiry is used (inquiry document ID8, attached), without the loop to Downshire House. This would involve walking up to the Mount Clare Campus from the northern extent of Minstead Gardens (for sight of the bus stops), touring the Mount Clare campus as in the previous inquiry's site visit, and then walking back down Minstead Gardens having viewed the lodge and Temple (passing the rear of Picasso House), and up to Danebury Avenue. Assuming that this is acceptable to the Appellant, we should be grateful if you could provide a route map on this basis for the LPA's consideration.

### **Site Visit by LBW ahead of Inquiry**

Following the LPA's change of representative (as previously notified), it would be helpful for the LPA to visit the site ahead of the inquiry, particularly if aspects of the evidence are ultimately examined prior to the inquiry site visit.

Would it be acceptable for members of the LPA team to visit the site beginning at 11.30 AM on Monday, 12 January? It is intended that Richard Wald KC, Dave Worth and Nik Smith would attend, and it would be helpful in particular if they could view the interior of one of the refurbished accommodation blocks, if possible, as Andrew Gillick has previously offered to Dave Worth. We should be very grateful if you could confirm whether this will be possible as soon as you are able to do so.

### **Size of Accommodation Blocks' Units**

Following review of the Appellant's submissions, and particularly the proof of Daniel Curtin, the LPA would be grateful if the Appellant could confirm the precise proposed dimensions of the units in accommodation blocks A to E.

The planning application drawings (and many of the drawings included in Mr Curtin's proof) indicate room floor areas of either 6m<sup>2</sup> or 10m<sup>2</sup> in these blocks, while Mr Curtin's proof at page 24 indicates that the larger, ensuite rooms will be 10.2m<sup>2</sup>. It would be helpful if the Appellant could also clarify whether for the larger rooms the 10m<sup>2</sup> measurement (assuming that this is accurate) incorporates the area of the ensuite toilet/shower rooms (which the drawings indicate are 1m<sup>2</sup>), or whether these have been measured separately (as appears to be the case). In any case, could the Appellant also confirm the precise proposed dimensions of the ensuite toilet/shower rooms?

We look forward to hearing from you on the points raised above.

Kind regards,

**Janet Ferguson**

Planning Manager | Strategic Development Team  
London Borough of Wandsworth

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<image002.png>

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