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London Borough of Richmond upon Thames  
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Our ref: NTH/AKG/STHO/U0019289

**04 March 2024**

Dear Sir or Madam

**Former Stag Brewery, Lower Richmond Road, Mortlake, London  
Appeal Against the Non-Determination of Applications for Planning Permission (Appeal A and  
Appeal B) London Borough of Richmond upon Thames refs: 22/0900/OUT and 22/0902/FUL  
PINS references: APP/L5810/W/24/3339060 & APP/L5810/W/24/3339062**

On behalf of our client, Reselton Properties Limited (the “Appellant”), we have lodged simultaneous, conjoined appeals against the non-determination of two linked applications for Planning Permission refs: 22/0900/OUT and 22/0902/FUL at the Former Stag Brewery, Lower Richmond Road, Mortlake, London (‘the Site’). The appeal references are APP/L5810/W/24/3339060 (Appeal A (previously known as Application A)) & APP/L5810/W/24/3339062 (Appeal B (previously known as Application B)).

The purpose of this covering letter is to help navigate the filing system on London Borough of Richmond upon Thames’s website.

### Appeal A

To navigate the Appeal A documentation, please follow the steps below in conjunction with reviewing the “Master List of all Appeal A Material” tracker:

- i. Start by visiting the ‘Appeal Submission A’ section of the LBRuT website.
- ii. The appeal documentation has then been filed under sub-folders numbered 1-13.
  - a. the sub-folder numbering system of aligns with the question numbers contained in the appeal application forms “Supporting Documents” section). This is set out in Table 1 below.
  - b. Each document submitted with the appeal has a unique reference number. These are set out within the Master List of all Appeal A Material tracker, which should be read alongside a review of the sub-folders.
- iii. There are a number of ancillary documents also located within the sub-folders. The exact file locations are set out in the diagram below, and Table 1 below.

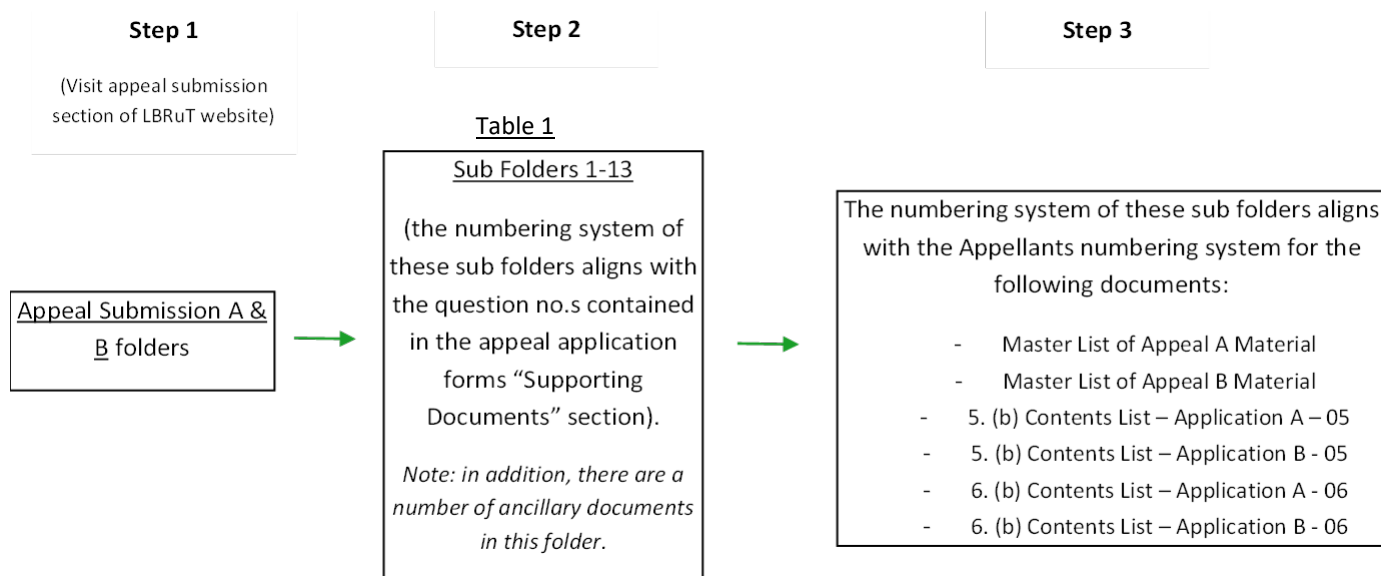


Table 1

	<u>Appeal Form Requirement</u>	<u>Provided?</u>	<u>Details</u>	<u>Filing Location</u>
1	A copy of the original application form sent to the LPA.	Yes	Contained within: <b>Master List of all Appeal A Material</b>  Document no: <b>325</b>	<u>Folder 1</u>
2	A copy of the site ownership certificate and agricultural holdings certificate submitted to the LPA at application stage (if these did not form part of the LPA's planning application form).	Yes	Contained within: <b>Master List of all Appeal A Material</b>  Document no: <b>325 &amp; 612</b>	<u>Folder 2</u>
3	A copy of the LPA's letter in which they acknowledged the application.	Yes	Uploaded on PINS website.	<u>Folder 3</u>
4	A site plan (preferably on a copy of an Ordnance Survey map at not less than 10,000 scale) showing the general location of the proposed development and its boundary. This plan should show two named roads	Yes	Contained within: <b>Master List of all Appeal A Material</b>  Document no: <b>25 &amp; 32</b>	<u>Folder 4</u>

	<u>Appeal Form Requirement</u>	<u>Provided?</u>	<u>Details</u>	<u>Filing Location</u>
	so as to assist identifying the location of the appeal site or premises. The application site should be edged or shaded in red and any other adjoining land owned or controlled by the appellant (if any) edged or shaded blue.			
5	(a) Copies of all plans, drawings and documents sent to the LPA as part of the application. The plans and drawings should show all boundaries and coloured markings given on those sent to the LPA.	Yes	Contained within: <b>Master List of all Appeal A Material</b>  All documents within: <b>Column entitled "March 2022 (Original Submission)"</b>	<u>Folder 5a &gt; 1.-19. Drawings OR 21. Drawings</u> (the numbering system of these sub folders aligns with the Appellants numbering system contained within: <b>Master List of Appeal A Material &amp; Contents List – Application A – 05</b> ).
	(b) A list of all plans, drawings and documents (stating drawing numbers) submitted with the application to the LPA.	Yes	See document entitled <b>"Contents List – Application A – 05"</b> dated 16 February 2024.	Folder 5b
	(c) A list of all plans, drawings and documents upon which the LPA made their decision.	No	Not applicable	Not applicable
6	(a) Copies of any additional plans, drawings and documents sent to the LPA but which did not form part of the original application.	Yes	Contained within: <b>Master List of all Appeal A Material</b>  All documents within:  Column entitled: <b>"Pre &amp; Post Validation Substitutions"</b>  Column entitled: <b>"(1) First Substitutions Pack (August 2022)"</b>	<u>Folder 6a &gt; Sub Folders 2.-6</u> (the numbering system of these sub folders aligns with the Appellants numbering system contained within: <b>Master List of Appeal A Material &amp; Contents List – Application A – 06</b> ).

	<u>Appeal Form Requirement</u>	<u>Provided?</u>	<u>Details</u>	<u>Filing Location</u>
			<p>Column entitled: “<b>Minor Changes Not Subject to Reconsultation (Jan &amp; Feb 2023)</b>”</p> <p>Column entitled: “<b>(2) Second Substitution Pack- Not Subject to Reconsultation (March &amp; April 2023)</b>”</p> <p>Column entitled: “<b>(3) Third Substitution Pack (November 2023)</b>”</p>	
	(b) A list of all plans, drawings and documents (stating drawing numbers) which did not form part of the original application.		See document entitled “ <b>Contents List - Application A - 06.</b> ”, dated 16 February 2024.	<u>Folder 6B</u>
7	A copy of the design and access statement sent to the LPA (if required).	Yes	<p>Contained within: <b>Master List of all Appeal A Material</b></p> <p>Document nos.: <b>346 -351</b></p> <p>Document nos.: <b>346a-350a</b></p> <p>Document nos.: <b>346b-349b</b></p>	<u>Folder 7 &gt; Sub Folders</u> (the numbering system of these sub folders aligns with the Appellants numbering system contained within: <b>Master List of Appeal A Material</b> )
8	A copy of a draft statement of common ground if you have indicated the appeal should follow the hearing or inquiry procedure.	Yes	<p>Contained within:</p> <p><b>-Draft Statement of Common Ground</b>, prepared by Gerald Eve LLP; and</p> <p><b>-Draft Financial Viability Statement of Common Ground</b>, prepared by BNP Paribas.</p>	<u>Folder 8</u>
9	(a) Additional plans, drawings or documents relating to the application but not previously seen	No	Not applicable	Not applicable

	<u>Appeal Form Requirement</u>	<u>Provided?</u>	<u>Details</u>	<u>Filing Location</u>
	by the LPA. Acceptance of these will be at the Inspector's discretion.			
	(b) A list of all plans and drawings (stating drawing numbers) submitted but not previously seen by the LPA.	No	Not applicable	Not applicable
10	Any relevant correspondence with the LPA. Including any supporting information submitted with your application in accordance with the list of local requirements.		<p>Contained within: <b>Master List of all Appeal A Material</b></p> <p>All documents within:</p> <p>Column entitled: <b>“Pre &amp; Post Validation Substitutions”</b></p> <p>Column entitled: <b>“(1) First Substitutions Pack (August 2022)”</b></p> <p>Column entitled: <b>“Minor Changes Not Subject to Reconsultation (Jan &amp; Feb 2023)”</b></p> <p>Column entitled: <b>“(2) Second Substitution Pack- Not Subject to Reconsultation (March &amp; April 2023)”</b></p> <p>Column entitled: <b>“(3) Third Substitution Pack (November 2023)”</b></p>	
11	If the appeal is against the LPA's refusal or failure to approve the matters reserved under an outline permission, please enclose: the relevant outline application; all plans sent at outline application stage; and the original outline planning permission.	No	Not applicable	Not applicable

	<u>Appeal Form Requirement</u>	<u>Provided?</u>	<u>Details</u>	<u>Filing Location</u>
12	If the appeal is against the LPA's refusal or failure to decide an application which relates to a condition, we must have a copy of the original permission with the condition attached.	No	Not applicable	Not applicable
13	A copy of any Environmental Statement plus certificates and notices relating to publicity (if one was sent with the application, or required by the LPA).	Yes	<p>Contained within: <b>Master List of all Appeal A Material</b></p> <p>Columns (with document nos.):</p> <p><u>March 2022 (Original Submission)</u></p> <p>-(404) ES Non Technical Summary</p> <p>-(405-426) ES Main Text (Chapters)</p> <p>-(427-434) ES Figures</p> <p>-(435-497) ES Appendices Pre &amp; Post Validation Substitutions</p> <p>-(429a) ES Figures Part 3</p> <p><u>(1) First Substitutions Pack (August 2022)</u></p> <p>-(403) ES Letter of Conformity</p> <p>-(403a) ES Letter of Conformity</p> <p>-(417a) ES Chapter 13</p>	<p><u>Folder 13 &gt; Sub Folders</u> (the numbering system of these sub folders aligns with the Appellants numbering system contained within: <b>Master List of Appeal A Material</b>)</p>

	<u>Appeal Form Requirement</u>	<u>Provided?</u>	<u>Details</u>	<u>Filing Location</u>
			<p>-(427a-428a) Replacement ES Figures 13.1-13.10 Part 1 &amp; 2</p> <p>-(476a- 477a) ES Appendix 12.5</p> <p>-(478a-482) ES Appendix 13.1-13.5</p> <p><u>Minor Changes Not Subject to Reconsultation (Jan &amp; Feb 2023)</u></p> <p>-(420a) MASTERPLAN- TREE PROTECTION PLAN</p> <p><u>(2) Second Substitution Pack- Not Subject to Reconsultation (March &amp; April 2023)</u></p> <p>-(403b) ES Statement of Conformity</p> <p>-(403c) ES Statement of Conformity</p> <p>-(422a) ES Chapter 18, ES Appendix 18.5 and ES SoC</p>	
14	If the appeal is against the LPA's refusal or failure to decide an application because of a dispute over local list documentation, a copy of the letter sent to the LPA which explained why the document was not necessary and asked the LPA to waive the requirement that it be provided with the application.	No	Not applicable	Not applicable

Appeal B

To navigate the Appeal B documentation, please follow the steps below in conjunction with reviewing the “Master List of all Appeal B Material” tracker:

- i. Start by visiting the ‘Appeal Submission B’ section of the LBRuT website..
- ii. The appeal documentation has then been filed under sub-folders numbered 1-13.
  - a. the sub-folder numbering system of aligns with the question numbers contained in the appeal application forms “Supporting Documents” section). This is set out in Table 2 below.
  - b. Each document submitted with the appeal has a unique reference number. These are set out within the Master List of all Appeal B Material tracker, which should be read alongside a review of the sub-folders.
- iii. There are a number of ancillary documents also located within the sub-folders. The exact file locations are set out in Table 2 below.

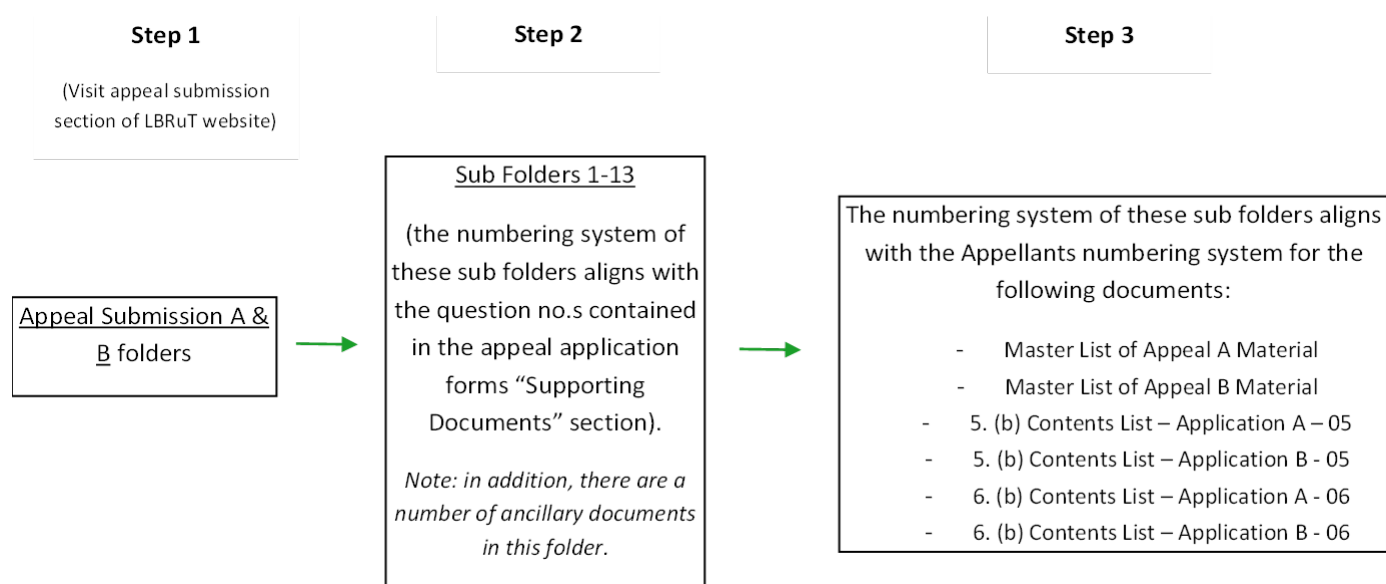


Table 2

	<u>Appeal Form Requirement</u>	<u>Provided?</u>	<u>Details</u>	<u>Filing Location</u>
1	A copy of the original application form sent to the LPA.	Yes	Contained within: <b>Master List of all Appeal B Material</b>  Document no: 69	<u>Folder 1</u>
2	A copy of the site ownership certificate and agricultural holdings certificate submitted to the LPA at	Yes	Contained within: <b>Master List of all Appeal B Material</b>	<u>Folder 2</u>



	<b>Appeal Form Requirement</b>	<b>Provided?</b>	<b>Details</b>	<b>Filing Location</b>
	application stage (if these did not form part of the LPA's planning application form).		Document no: <b>69</b>	
3	A copy of the LPA's letter in which they acknowledged the application.	Yes	Uploaded on PINS website.	<u>Folder 3</u>
4	A site plan (preferably on a copy of an Ordnance Survey map at not less than 10,000 scale) showing the general location of the proposed development and its boundary. This plan should show two named roads so as to assist identifying the location of the appeal site or premises. The application site should be edged or shaded in red and any other adjoining land owned or controlled by the appellant (if any) edged or shaded blue.	Yes	Contained within: <b>Master List of all Appeal B Material</b> Document no: <b>1 &amp; 5</b>	<u>Folder 4</u>
5	(a) Copies of all plans, drawings and documents sent to the LPA as part of the application. The plans and drawings should show all boundaries and coloured markings given on those sent to the LPA.	Yes	Contained within: <b>Master List of all Appeal B Material</b>  All documents within: <b>Column entitled "March 2022 (Original Submission)"</b>	<u>Folder 5a &gt; 1.-19. Drawings OR 21. Drawings</u> (the numbering system of these sub folders aligns with the Appellants numbering system contained within: <b>Master List of Appeal B Material &amp; Contents List – Application B – 05</b> ).
	(b) A list of all plans, drawings and documents (stating drawing numbers) submitted with the application to the LPA.	Yes	See document entitled " <b>Contents List – Application B – 05</b> " dated 16 February 2024	Folder 5b
	(c) A list of all plans, drawings and documents upon which the LPA made their decision.	No	Not applicable	Not applicable
6	(a) Copies of any additional plans, drawings and documents sent to the LPA but which did not form part of the original application.	Yes	Contained within: <b>Master List of all Appeal B Material</b>	<u>Folder 6a &gt; Sub Folders 2.-5.</u> (the numbering system of these sub

	<u>Appeal Form Requirement</u>	<u>Provided?</u>	<u>Details</u>	<u>Filing Location</u>
			<p>All documents within:</p> <p>Column entitled: <b>“Pre &amp; Post Validation Substitutions”</b></p> <p>Column entitled: <b>“(1) First Substitutions Pack (August 2022)”</b></p> <p>Column entitled: <b>“Minor Changes Not Subject to Reconsultation (Jan &amp; Feb 2023)”</b></p> <p>Column entitled: <b>“(2) Second Substitution Pack- Not Subject to Reconsultation (March &amp; April 2023)”</b></p>	folders aligns with the Appellants numbering system contained within: <b>Master List of Appeal B Material &amp; Contents List – Application B – 06.</b>
	(b) A list of all plans, drawings and documents (stating drawing numbers) which did not form part of the original application.	Yes	See document entitled <b>“Contents List - Application B - 06.”</b> , dated 16 February 2024	Folder 6b
7	A copy of the design and access statement sent to the LPA (if required).	Yes	<p>Contained within: <b>Master List of all Appeal B Material</b></p> <p>Document nos.: <b>85-92</b></p>	Folder 7 > <u>Sub Folders</u> (the numbering system of these sub folders aligns with the Appellants numbering system contained within: <b>Master List of Appeal B Material</b> )
8	A copy of a draft statement of common ground if you have indicated the appeal should follow the hearing or inquiry procedure.	Yes	<p>Contained within:</p> <p><b>-Draft Statement of Common Ground</b>, prepared by Gerald Eve LLP; and</p> <p><b>-Draft Financial Viability Statement of Common</b></p>	Folder 8

	<u>Appeal Form Requirement</u>	<u>Provided?</u>	<u>Details</u>	<u>Filing Location</u>
			<b>Ground</b> , prepared by BNP Paribas.	
9	(a) Additional plans, drawings or documents relating to the application but not previously seen by the LPA. Acceptance of these will be at the Inspector's discretion.	No	Not applicable	Not applicable
	(b) A list of all plans and drawings (stating drawing numbers) submitted but not previously seen by the LPA.	No	Not applicable	Not applicable
10	Any relevant correspondence with the LPA. Including any supporting information submitted with your application in accordance with the list of local requirements.		<p>Contained within: <b>Master List of all Appeal A Material</b></p> <p>All documents within:</p> <p>Column entitled: <b>“Pre &amp; Post Validation Substitutions”</b></p> <p>Column entitled: <b>“(1) First Substitutions Pack (August 2022)”</b></p> <p>Column entitled: <b>“Minor Changes Not Subject to Reconsultation (Jan &amp; Feb 2023)”</b></p> <p>Column entitled: <b>“(2) Second Substitution Pack- Not Subject to Reconsultation (March &amp; April 2023)”</b></p>	
11	If the appeal is against the LPA's refusal or failure to approve the matters reserved under an outline permission, please enclose: the relevant outline application; all plans sent at outline application stage; and the original outline planning permission.	No	Not applicable	Not applicable

	<u>Appeal Form Requirement</u>	<u>Provided?</u>	<u>Details</u>	<u>Filing Location</u>
12	If the appeal is against the LPA's refusal or failure to decide an application which relates to a condition, we must have a copy of the original permission with the condition attached.	No	Not applicable	Not applicable
13	A copy of any Environmental Statement plus certificates and notices relating to publicity (if one was sent with the application, or required by the LPA).	Yes	<p>Contained within: <b>Master List of all Appeal B Material</b></p> <p>Columns (with document nos.):</p> <p><u>March 2022 (Original Submission)</u></p> <p>-(133) ES Non Technical Summary</p> <p>-(134-155) ES Main Text (Chapters)</p> <p>-(156-163) ES Figures</p> <p>-(164-226) ES Appendices Pre &amp; Post Validation Substitutions</p> <p>-(158a) ES Figures Part 3</p> <p><u>(1) First Substitutions Pack (August 2022)</u></p> <p>-(132) ES Letter of Conformity</p> <p>-(132a) ES Letter of Conformity</p> <p>-(146a) ES Chapter 13</p> <p>-(156a-157a) Replacement ES Figures 13.1-13.10 Part 1 &amp; 2</p>	<p><u>Folder 13 &gt; Sub Folders</u> (the numbering system of these sub folders aligns with the Appellants numbering system contained within: <b>Master List of Appeal B Material</b>)</p>

	<u>Appeal Form Requirement</u>	<u>Provided?</u>	<u>Details</u>	<u>Filing Location</u>
			<p>-(205a-206a) ES Appendix 12.5 Part 1&amp;2</p> <p>-(207a) ES Appendix 13.1</p> <p>-(208a) ES Appendix 13.2</p> <p>-(209) ES Appendix 13.3 Supplementary Protected Species Report Part 1&amp;2</p> <p>-(210a) ES Appendix 13.4 WFD Screening</p> <p>-(211a) ES Appendix 13.5 BNG</p> <p><u>Minor Changes Not Subject to Reconsultation (Jan &amp; Feb 2023)</u></p> <p>-(149a) MATERPLAN APPLICATIONS A &amp; B TREE PROTECTION PLAN</p> <p><u>(2) Second Substitution Pack- Not Subject to Reconsultation (March &amp; April 2023)</u></p> <p>-(132b) ES Statement of Conformity</p> <p>-(132c) ES Statement of Conformity</p> <p>-(151a) ES Chapter 18, ES Appendix 18.5 and ES SoC</p> <p>-(190a) ES Appendix 10.4</p>	
14	If the appeal is against the LPA's refusal or failure to decide an application because of a dispute over local list documentation, a copy of the letter sent to the LPA	No	Not applicable	Not applicable

	<u>Appeal Form Requirement</u>	<u>Provided?</u>	<u>Details</u>	<u>Filing Location</u>
	which explained why the document was not necessary and asked the LPA to waive the requirement that it be provided with the application.			

We trust that the above is useful.

Yours faithfully

*Gerald Eve LLP*

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