

Project:

Independence House

84 Lower Mortlake Road
Richmond
TW9 2HS

Date:

December 2023

Report:

Design & Access Statement

Revision:

P0

WIMSHURST
PELLERITI

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Project Team



Client



Architect



Planning Consultant



Economic Viability



Daylight & Sunlight



Project Manager



Planning Development Consultant



M&E Engineer & Energy Consultant



Transport Consultant



Report 01 : Design & Access Statement

Please note that this report includes the following

Contents

- Introduction
- 01. The Site
- 02. Existing Building
- 03. Planning History, Context & Policy
- 04. Design Approach
- 05. Proposal
- 06. Technical Information

Please note that this report includes the following

- Inclusive access statement
- Wheelchair Housing Statement to address Building Regulations Requirement M4(3)
- Residential standards statement
- Urban Greening Factor calculations
- Landscape Proposal
- Play and Child Occupancy Assessment

INTRODUCTION

INDEPENDENCE HOUSE

Introduction & Brief

Independence House is an E class office building located on Lower Mortlake Road, 0.5mile from Central Richmond.

The existing building was completed in 1988 and the client occupied the building for over 20 years as a regional headquarters but moved to new premises at The Old Court in Richmond in 2020.

At around the same time, Wimshurst Pelleriti (WP) and others were appointed to develop a scheme to extend and refurbish the building for its existing office use, with the view to attracting a long term commercial tenant. Planning permission for this scheme was secured in early 2021. (Ref. 20/3359/FUL)

However, due the current economic climate and trend towards home working (accelerated by the pandemic) there has been a significant and sharp downturn in the demand for commercial office space and it has not been possible to find prospective tenants for the approved scheme, which remains unimplemented. Furthermore, due to a substantial rise in build cost since approval, the consented scheme is no longer viable to speculatively implement. Therefore, Independence House is currently vacant and is set to remain so for the foreseeable future.

It is in this context that WP and the consultant team have been appointed to develop a new proposal for the site, to retain, extend and fully retrofit the existing structure whilst securing its change of use to C3 residential. The project's central aim is to provide high quality homes, giving the building a new lease of life and ensuring its viability for the future.

The proposal seeks to significantly enhance and upgrade the building including its visual appearance whilst making some modest extensions, broadly in line with the consented scheme. The project's key objectives are as follows:

- Secure change of use for the site to provide high quality C3 residential accommodation.
- Create a high quality and sustainable residential building
- Improve the external appearance of the building
- Enhance arrival experience
- Bring building up to date with current Part M access requirements
- Provide high quality external amenity spaces and external areas
- Explore opportunities for additional floorspace
- Rationalise core, circulation and utility areas



Top: Aerial view looking south east



**Left: View from public footpath looking east / Centre: View from public footpath looking west
Right: View from across Lower Mortlake Road**

01. THE SITE

THE SITE

SITE LOCATION

Location

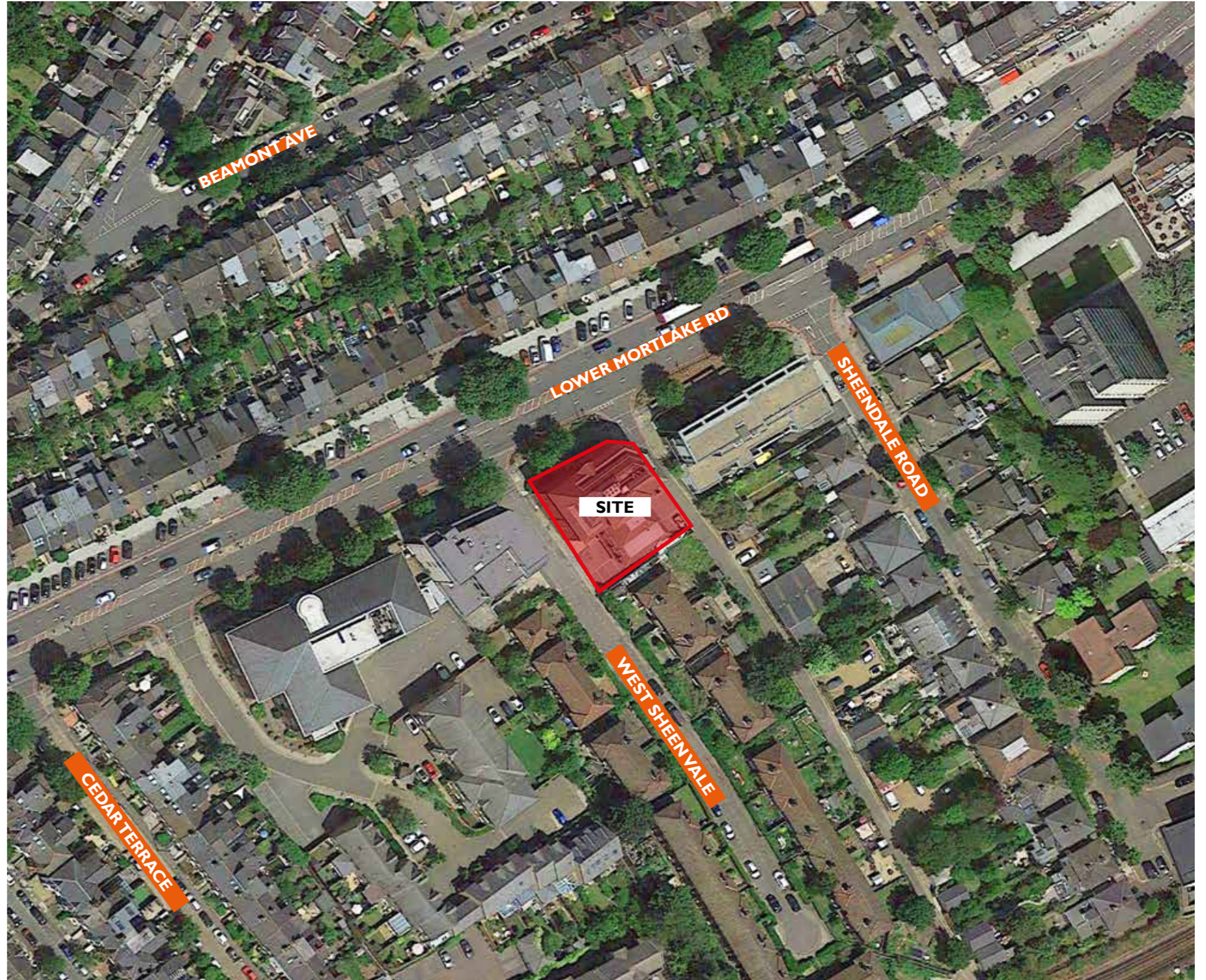
The application site is located on Lower Mortlake Road A316 which links Richmond to Twickenham in the west and Chiswick in the east.

Lower Mortlake Road is a busy arterial dual carriageway that has a varied character and a mix of uses with larger blocks neighbouring terraced houses.

The site does not sit within a conservation area and is not in close proximity of any statutory or locally listed buildings.



Aerial view from south east



Location plan

THE SITE

WIDER CONTEXT & ACCESSIBILITY

Transport

Situated off the A316 in the London Borough of Richmond, Independence House is located within easy reach of Richmond Station (offering national, underground and overground rail links into central London and the South West) and Richmond town centre.

Further transport links exist through the numerous bus services that run day and night along Lower Mortlake Road as well as additional national rail access via East Sheen station.

The site also benefits from off road parking to the rear and basement.



Wider site context & connectivity

THE SITE

EXISTING SITE CONDITION - FRONT

Front of the building issues

The existing building clearly has a number of inherent issues:

- Building has a poor skyline and roof profile with visible plant and railing enclosure.
- Building lacks a sense of arrival or destination due to poor quality public realm and a non compliant (in terms of equality / disabled access) entrance.
- Main entrance dark and uninviting. Does not provide level access.
- Dated external detailing.



Rear of the building issues

At the rear of the building:

- Poor skyline and building profile.
- Convoluted and non compliant rear escape stair.
- Lack of refuse enclosure.
- Restricted access due to low headroom.



THE SITE

SITE ASSESSMENT - PLANNING

Conservation Area & listed buildings

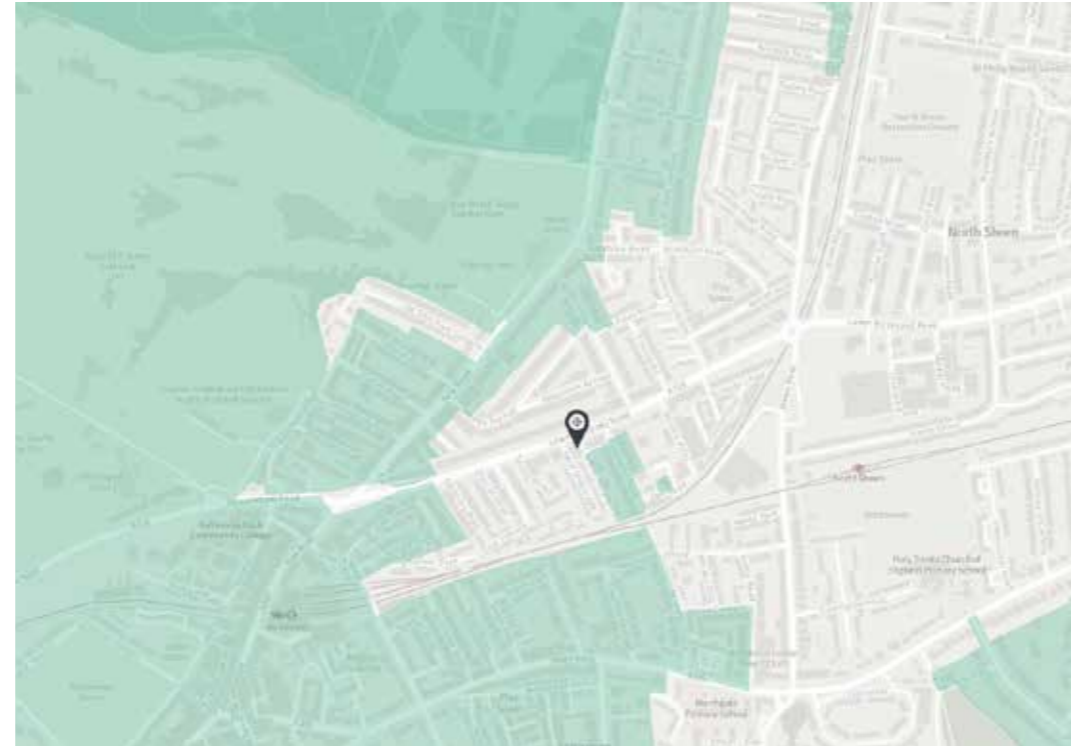
The site is not in a Conservation Area but is in close proximity to the Sheendale Road Conservation Area. There are no listed buildings in the immediate context.

PTAL rating

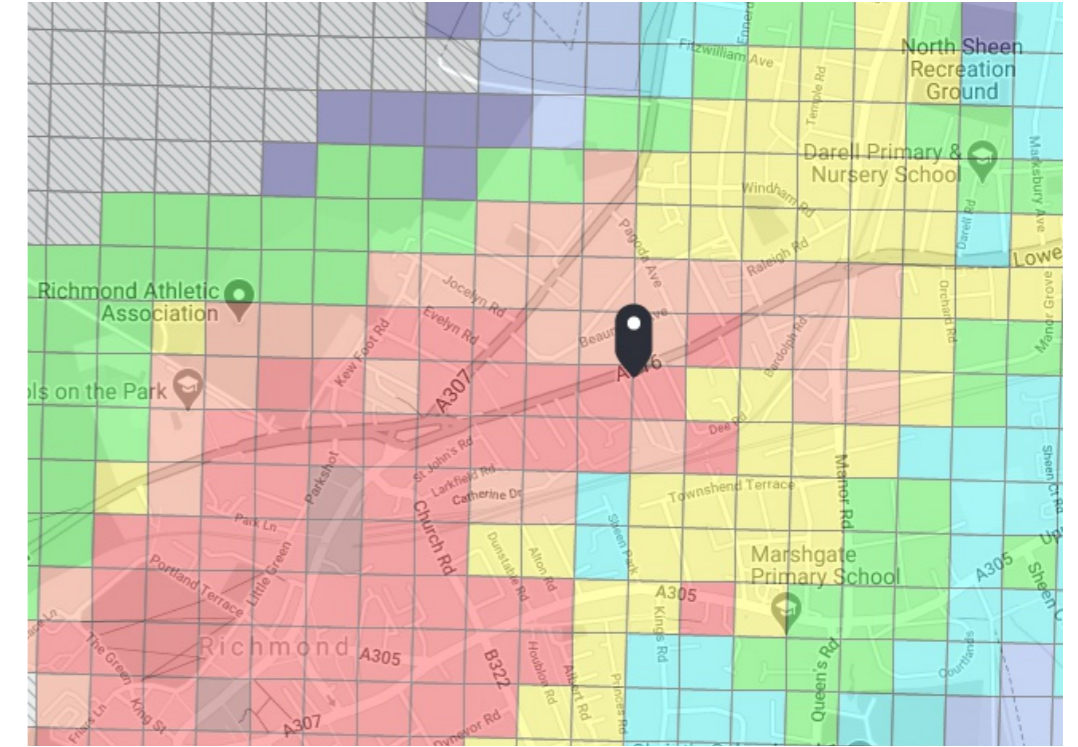
The site benefits from excellent transport links and is classified PTAL 6a rating.

Flooding

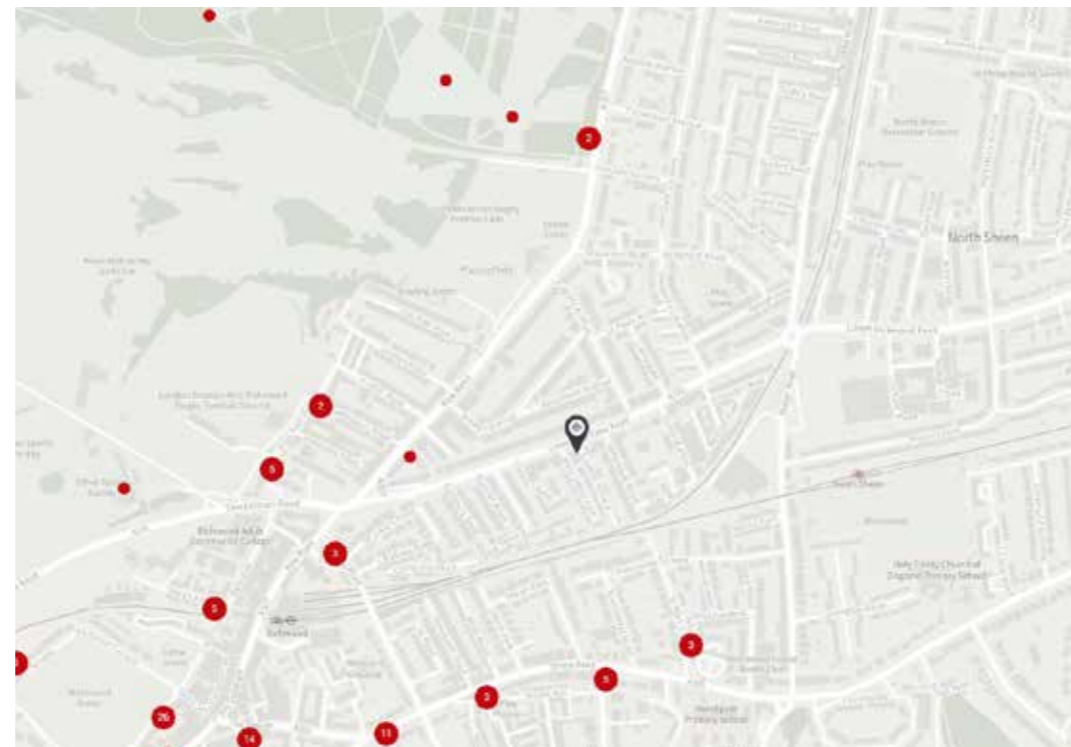
The site is outside flooding zones 1, 2 or 3. There is a low risk to surface water flooding, very low risk to rivers and sea flooding



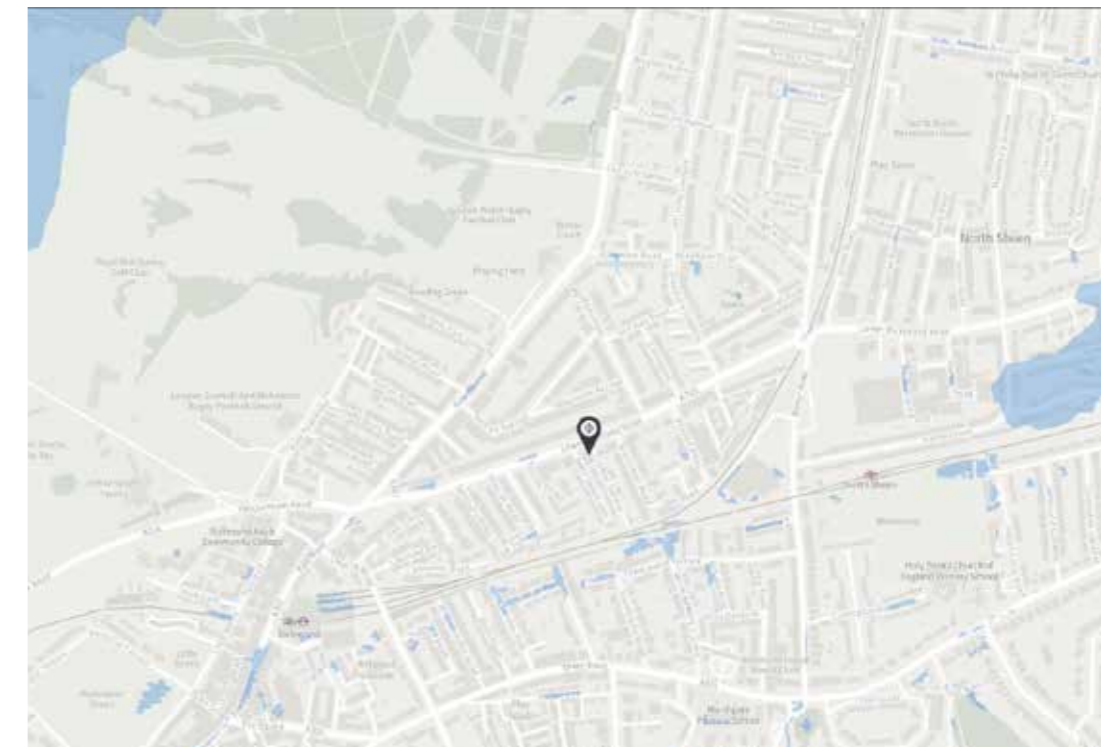
Conservation Area



PTAL map



Listed buildings



Flooding map

THE SITE
STREETSCAPE



Street Elevation - South side Lower Mortlake Road

THE SITE
STREETSCAPE



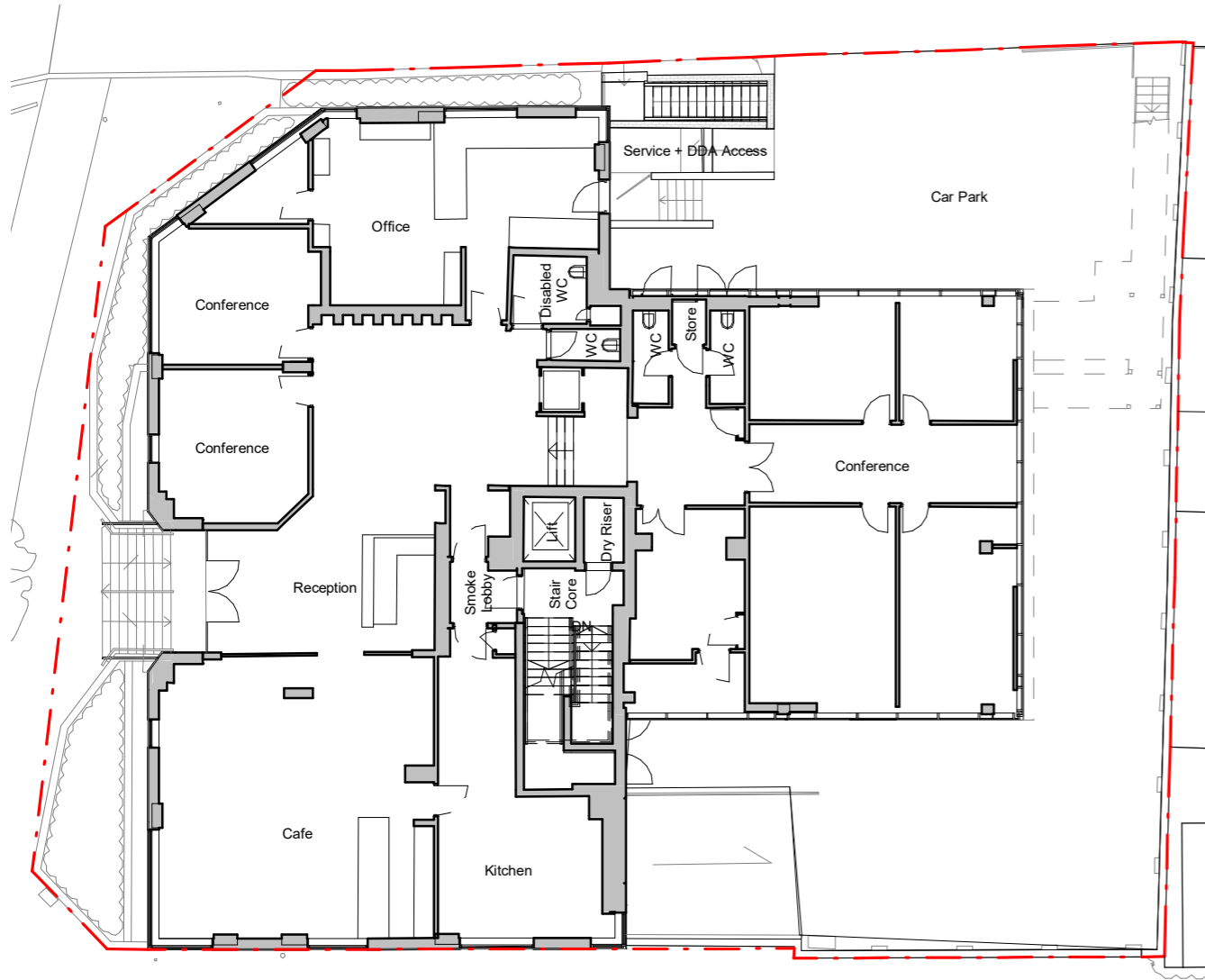
← Crofton Terrace (properties with addresses at West Sheen Vale) × Independence House × Lower Mortlake Rd × 147-165 Lower Mortlake Rd →

Street Elevation - East side Crofton Terrace

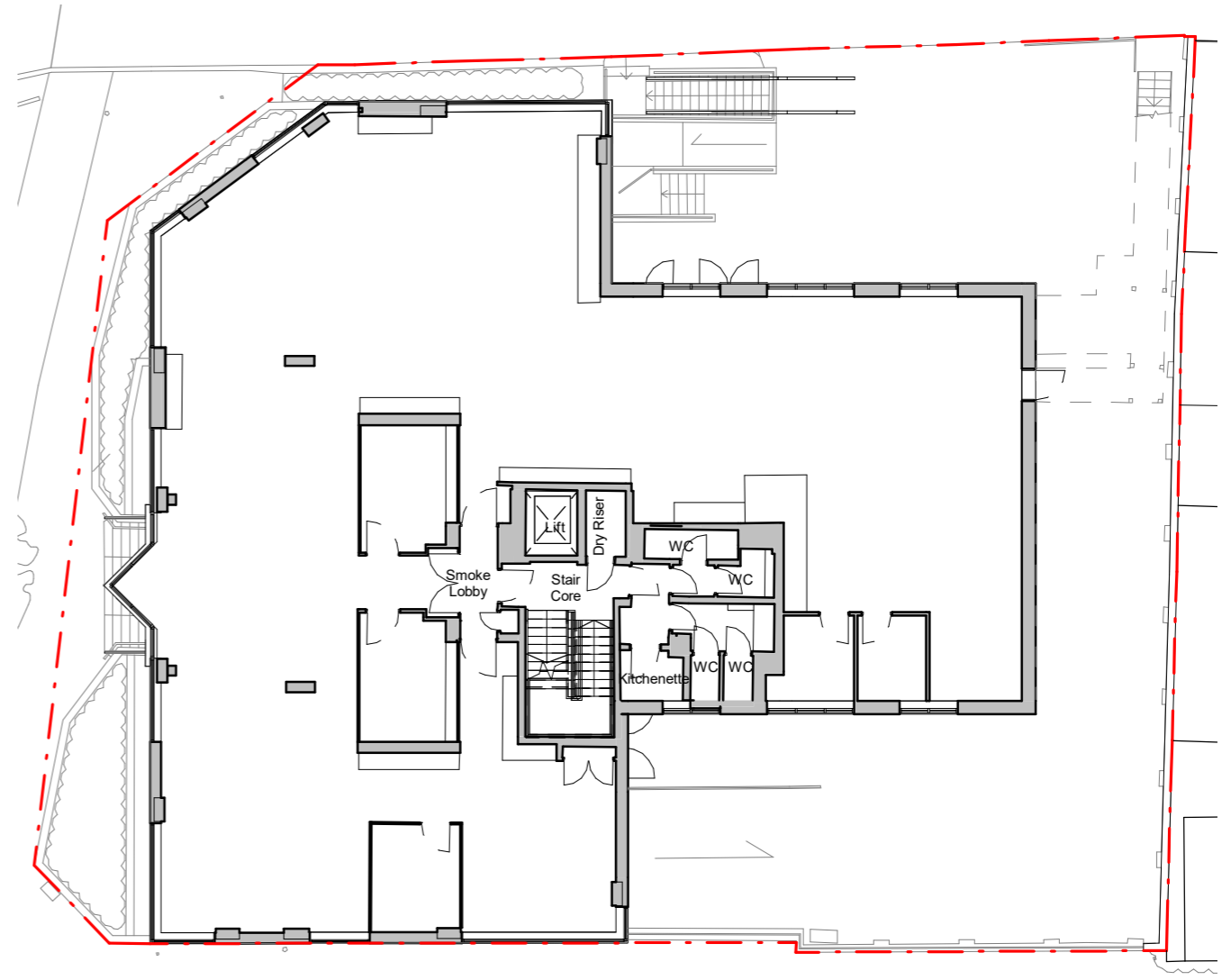
02. EXISTING BUILDING

EXISTING BUILDING

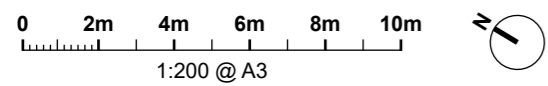
EXISTING PLANS



Ground Floor Plan

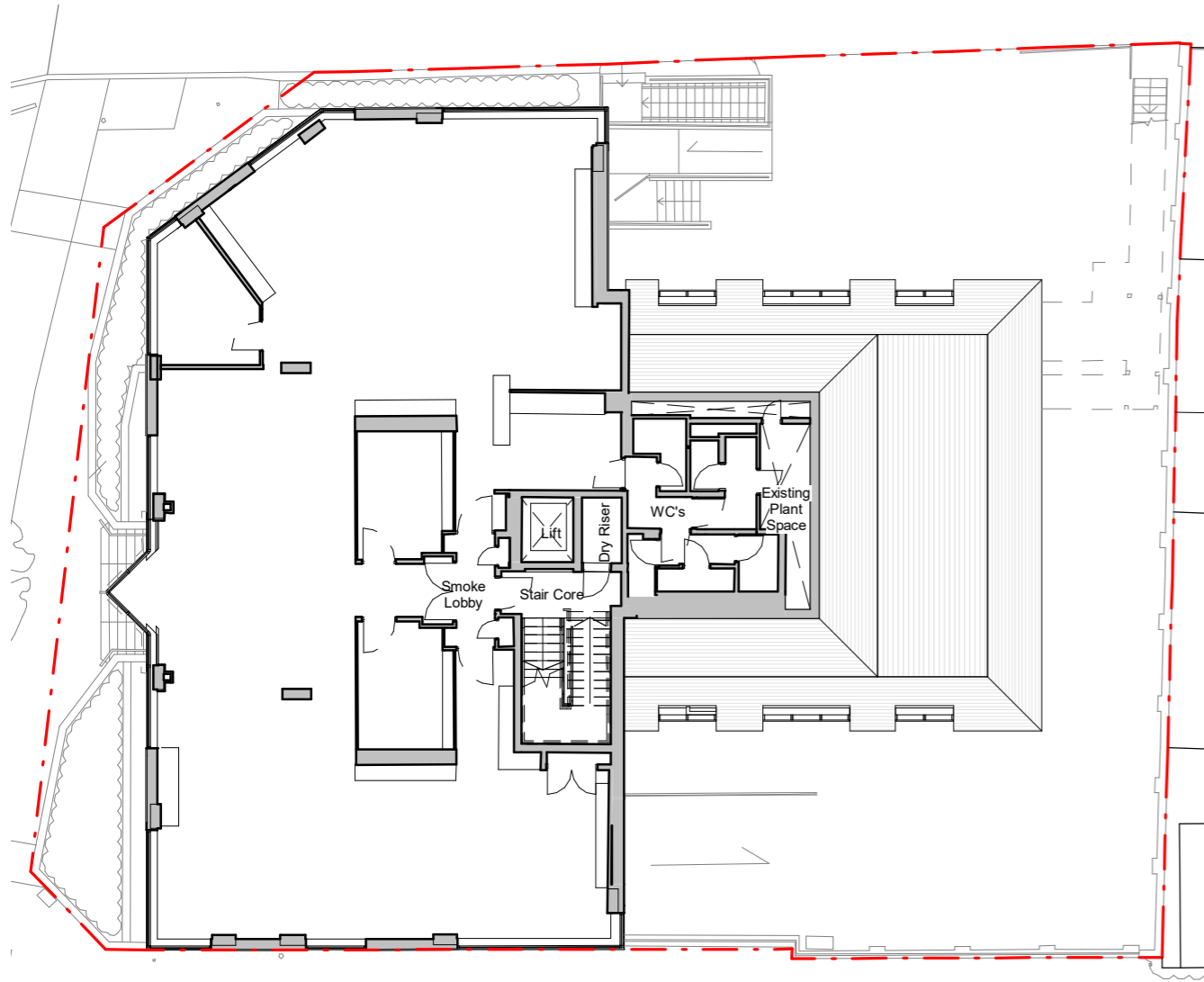


Level 01 Plan

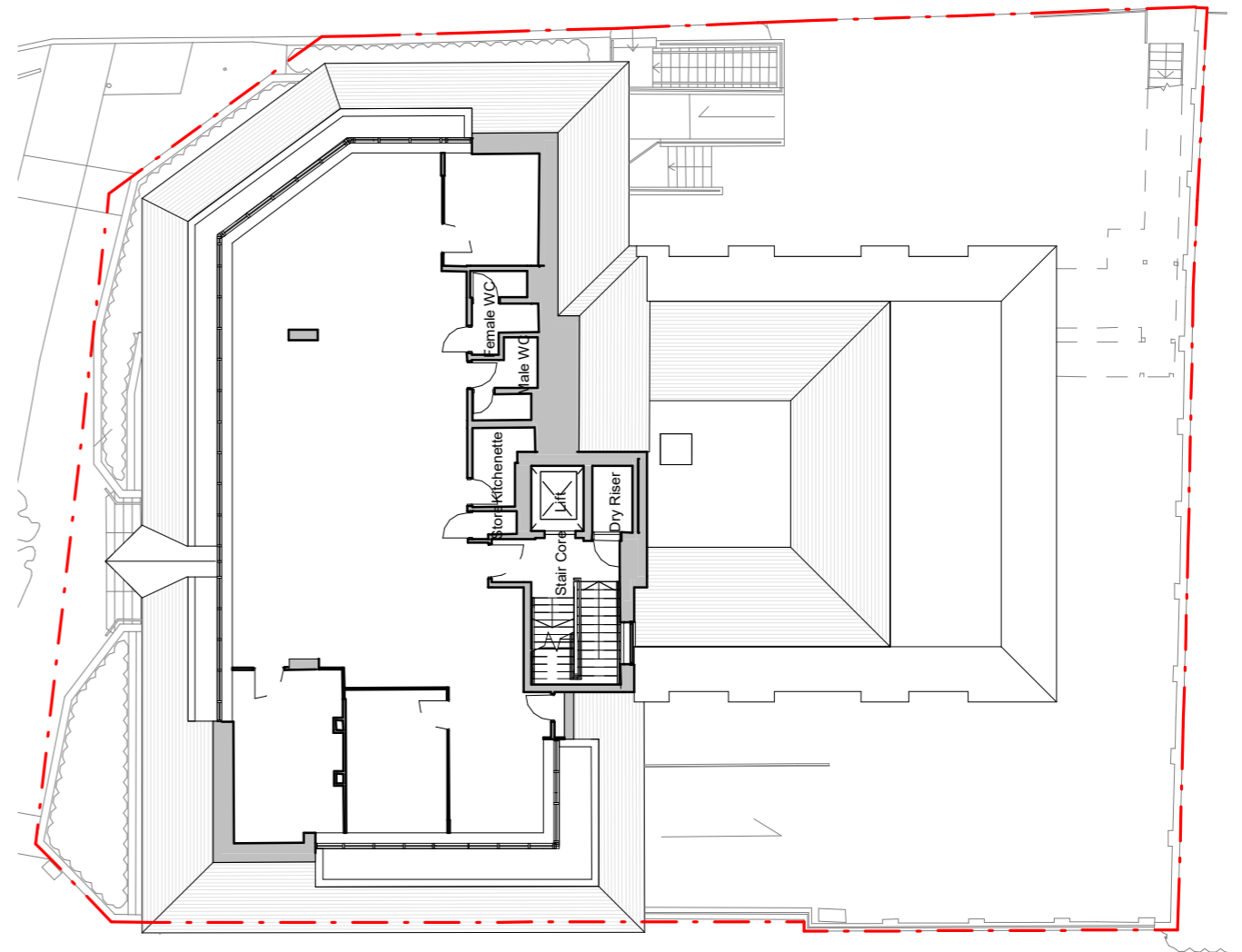


EXISTING BUILDING

EXISTING PLANS



Level 02 Plan



Level 03 Plan

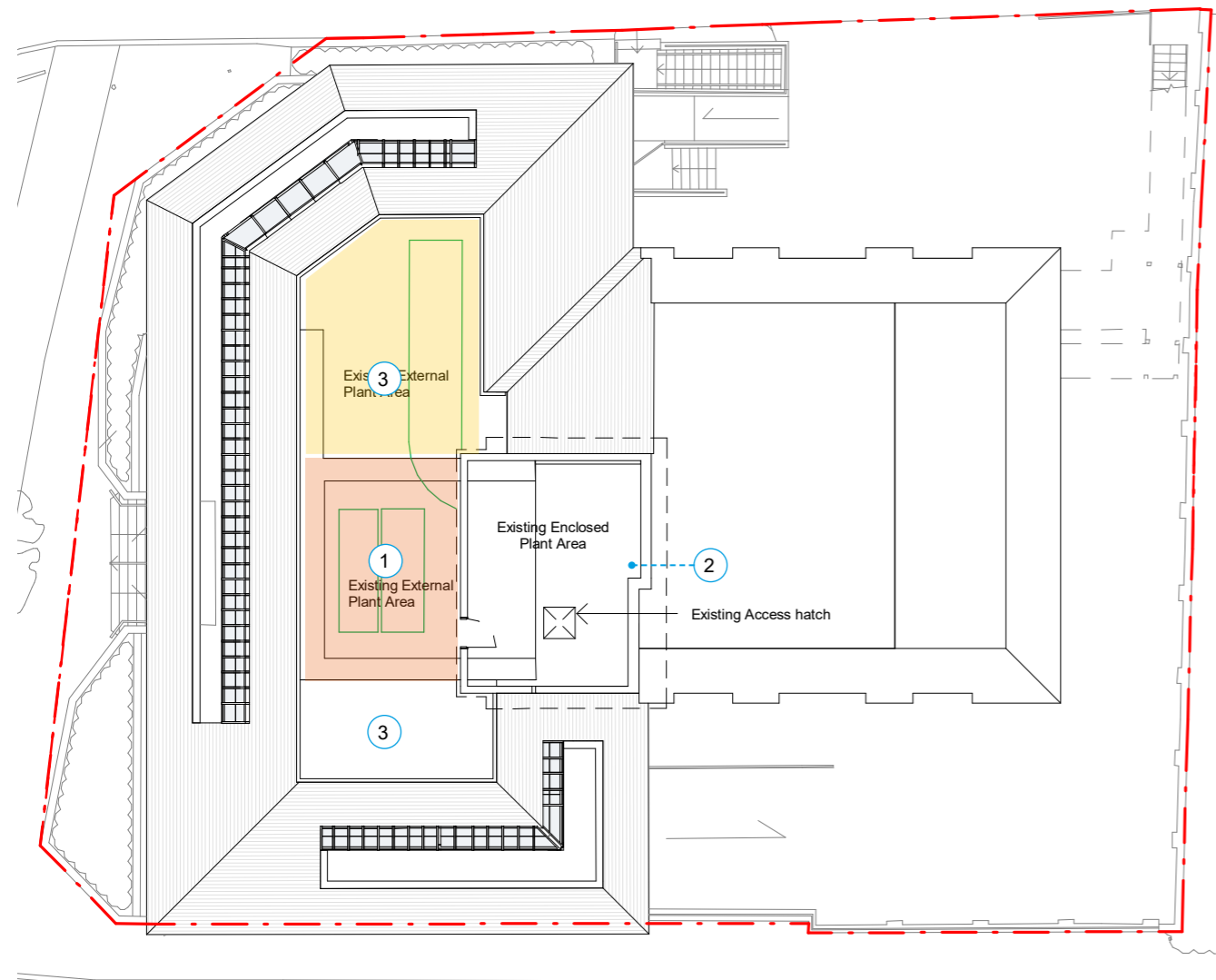
Area Summary

	Existing				Total
	Ground	Level 01	Level 02	Level 03	
NIA	262.3	397.2	279.1	158.0	1096.6
GIA	449.2	452.0	333.5	190.4	1425.1

* All areas shown on plan are NIA

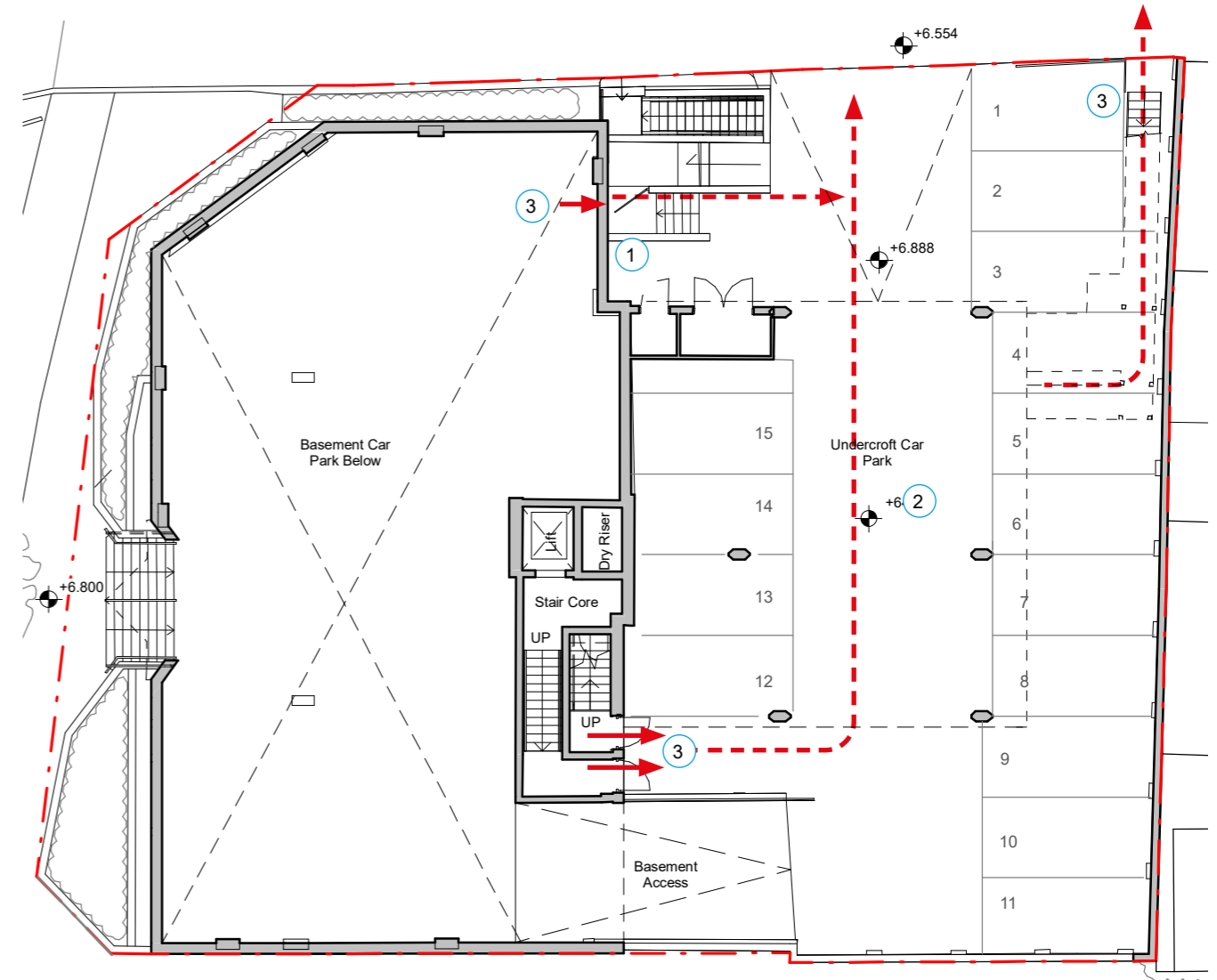
EXISTING BUILDING

EXISTING PLANS



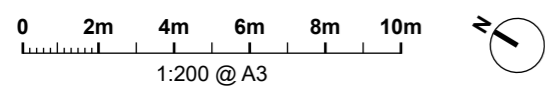
Level 04 Plan

1. Existing external plant area over concrete roof structure. (higher load capacity)
2. Existing internal plant area with access hatch to stair core below.
3. Existing external plant area over lightweight roof structure. (lower load capacity)



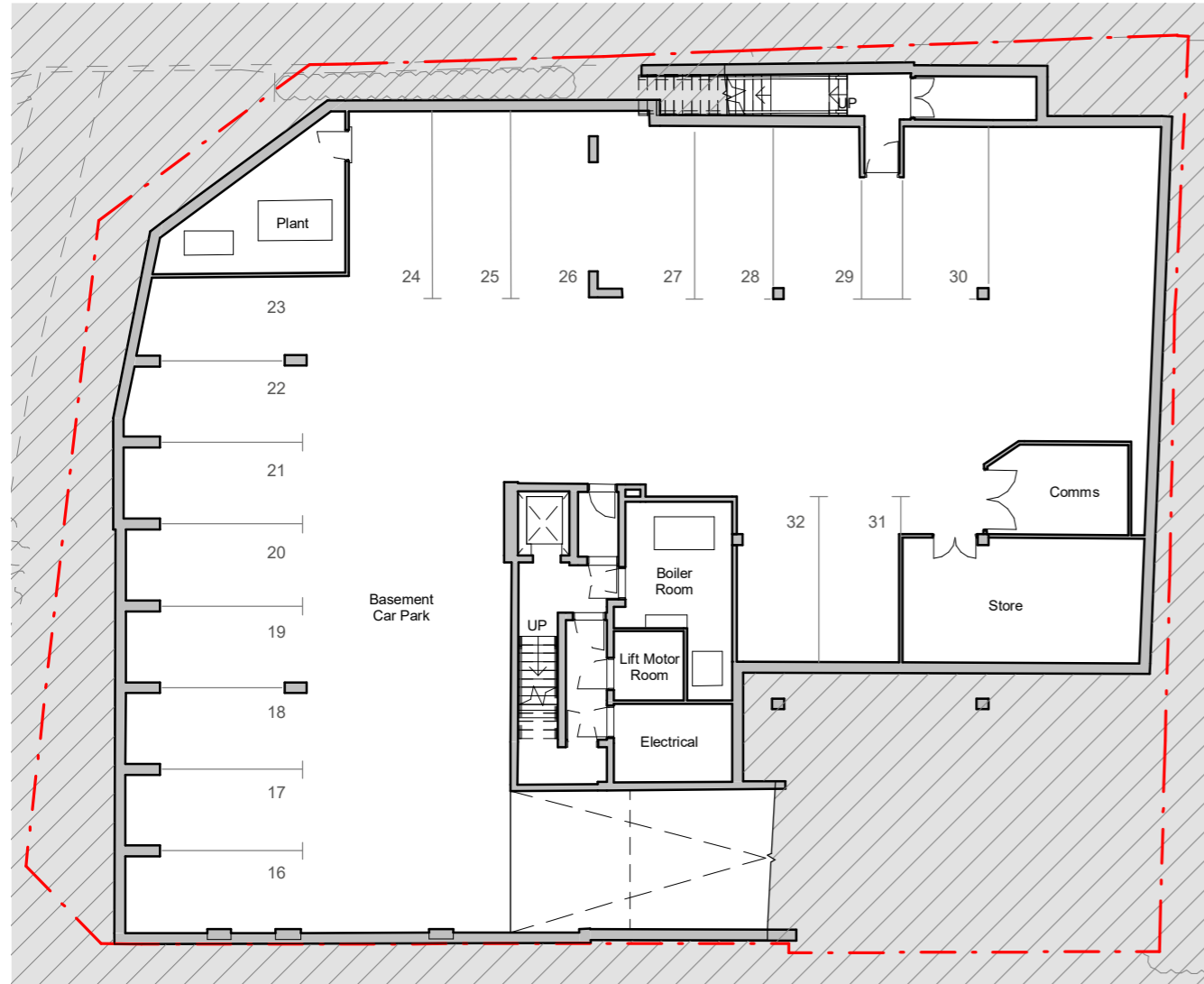
Street Level Plan

1. Existing refuse store, unenclosed with new fire escape above.
2. Existing undercroft parking with restricted headroom of 1.7m
3. Existing fire escape routes



EXISTING BUILDING

EXISTING PLANS



Basement Plan

EXISTING BUILDING

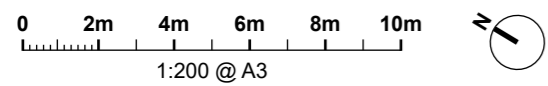
EXISTING ELEVATIONS



Existing North Elevation



Existing South Elevation



EXISTING BUILDING
EXISTING ELEVATIONS



Existing West Elevation



Existing East Elevation

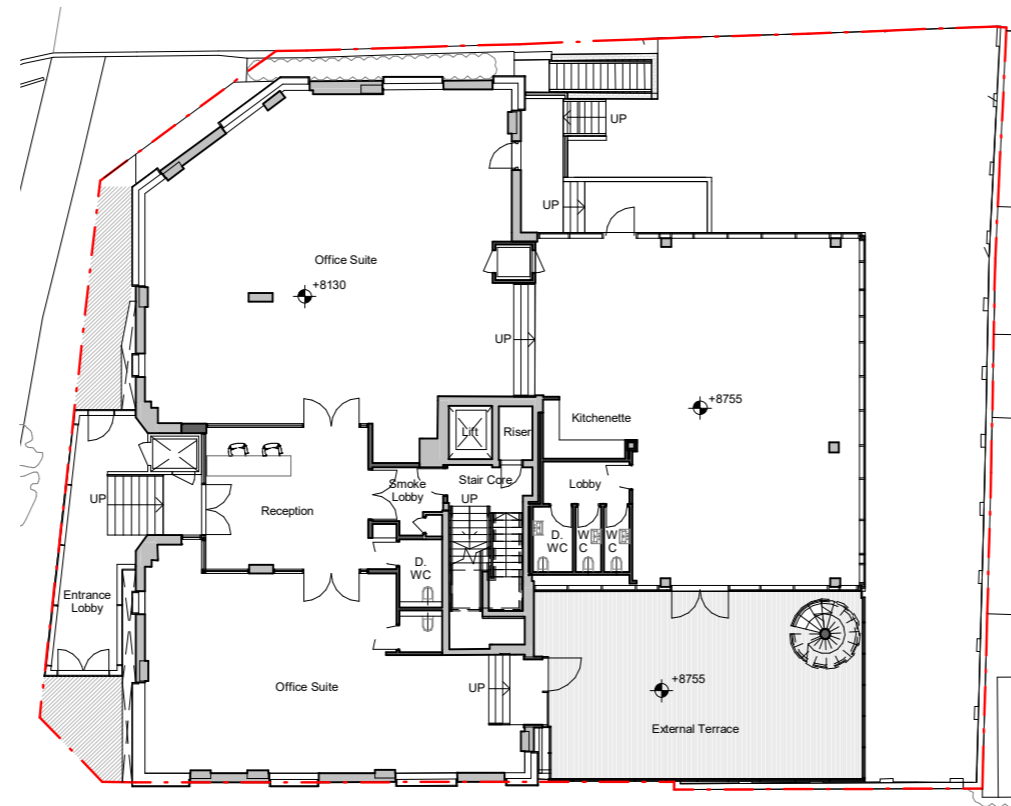
PLANNING HISTORY, CONTEXT & POLICY

CONSENTED SCHEME SUMMARY

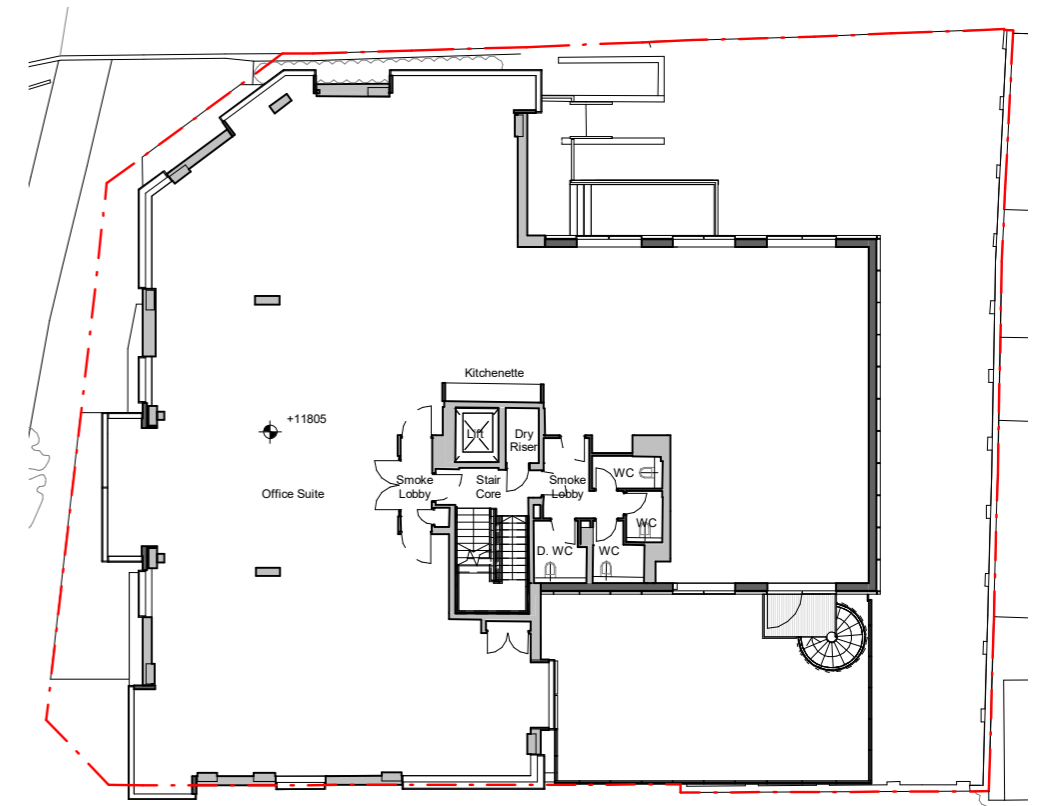
APP REF. 20/3359/FUL

Planning permission for an extension and refurbishment of the existing office building was secured in early 2021. The consented scheme established a number of key principles in terms of building envelope, which are summarised as follows.

- Established principle of additional mass.
- Established principle of additional bay windows, projecting on to street facing elevations.
- Refurbishment and extension of the existing office space.
- Refurbishment and extension of the existing core and services, with external plant area.
- New contemporary and extended top floor.
- New extension at ground floor level fronting Lower Mortlake Road to provide entrance lobby.
- Increase in the size of existing windows generally
- External roof terraces.
- Consideration of outlook and privacy from additional mass.



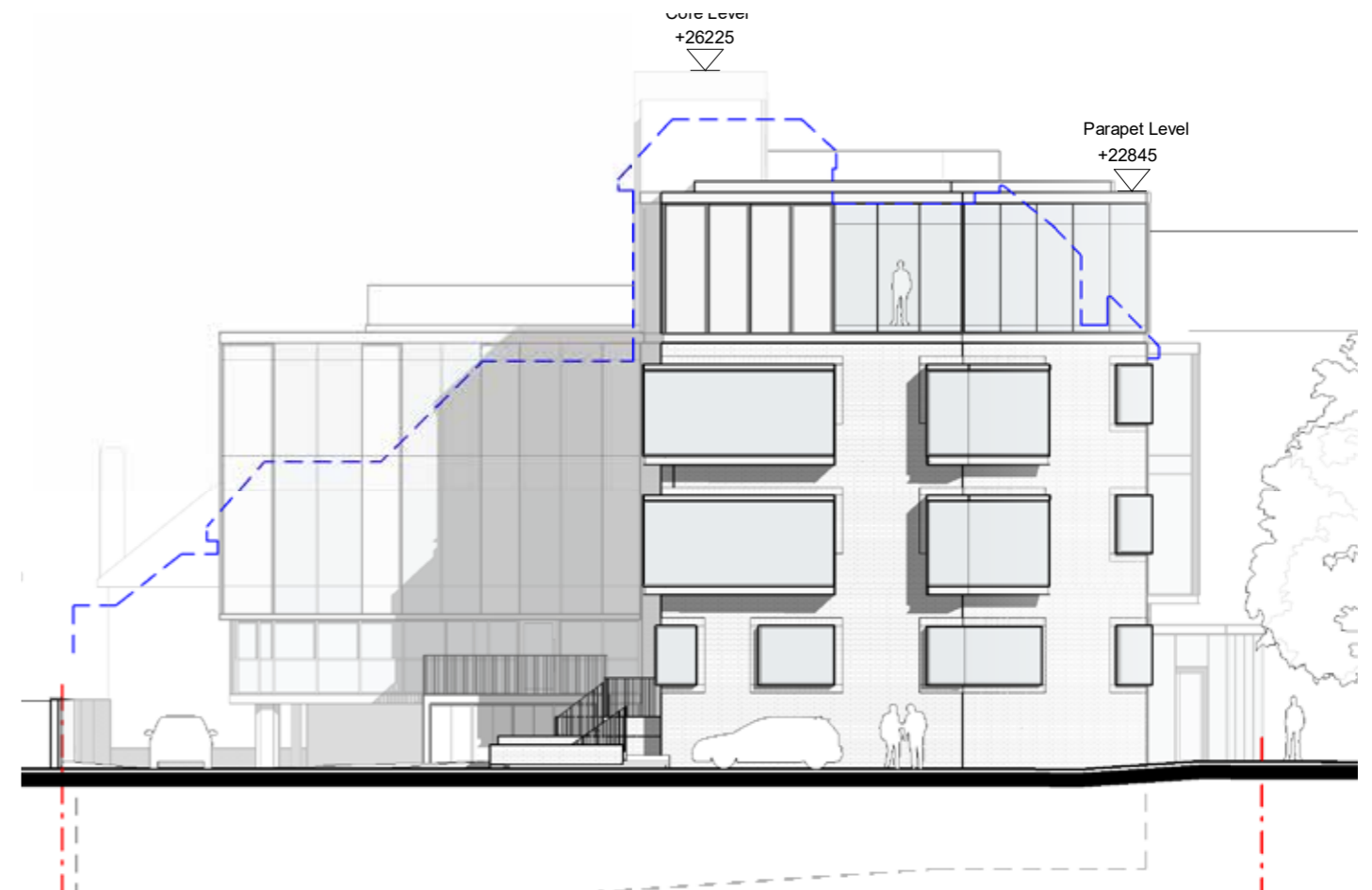
Approved Ground Floor Plan



Approved Level 01 Plan



Approved North Elevation



Approved East Elevation

PLANNING HISTORY, CONTEXT & POLICY



Approved Artist impression from Lower Mortlake Road looking down Crofton Terrace



PLANNING HISTORY, CONTEXT & POLICY

PRE-APPLICATION ADVICE

Pre-App Reference: 22/P0270/PREAPP
Letter date 16/02/2023

The scheme was submitted to Richmond Council for Planning Pre-Application advice in August 2022. Notwithstanding comments regarding the principle / land use (in relation to policy LP41), the design advice received was broadly supportive of the approach.

The following points focus on the design and transport related advice and explain how the proposed design responds to some of the items raised within the pre-app advice letter. WP's response is highlighted in blue.

Design Impact

The following feedback was provided by the urban design team.

"In relation to the design proposals, the building is sited between two modernist buildings to either side facing Lower Mortlake Road. The general design approach is similar to the approved 20/3359/FUL, but with a different treatment at top floor & roof level. The current proposals are for a distinctive slatted mansard type roof, which has the advantage of sloping away from the elevations providing a softer appearance than the approved more vertical top storey. Although the proposed height appears to be marginally higher than that of the approved scheme, the receding roof form provides a softer junction with neighbouring properties. On balance that would seem acceptable."

Comments were largely supportive of the design approach and proposed massing. However the additional top floor levels (over the consented scheme) have been omitted, ensuring that the building remains under 18m. The receding mansard roof form has been maintained, which as noted by the urban design team softens the junction of the roof meaning that the proposed massing profile is reduced to within the consented envelope.

Green Roof

It was noted that no green roof was proposed.

A bio-diverse green roof with photovoltaic's is proposed with an area of approx 270sqm

Transport

Principally comments related to an over provision of parking within the existing basement.

The proposal has reduced the on site parking level to low level, and provides only spaces for the 2 bedroom M4(3) and also family sized accommodation. Therefore in total only 5 spaces are proposed. A transport statement and an air quality statement have been submitted in support of the application and set out a policy compliant position.

Neighbour Amenity

As with the previous approved application 20/3359/FUL, the principal amenity issues to arise from the scheme would be light, noise, privacy and visual impact of the scheme.

No external plant is proposed, therefore the proposal will not generate any additional noise impacts.

A full daylight and sunlight report has been submitted in support of the application which concludes that there are no adverse impacts on neighbouring amenity.

As outlined later in this document, the position and orientation of the proposed windows and balconies has been considered to protect neighbouring properties from overlooking. 1.8m high privacy screens are proposed on balconies to prevent undue over looking and are indicated on the planning elevations. Within the front four storey element of the building, window positions are largely in their existing location. However on the north elevation, the window openings have been increased to provide winter gardens, facing onto Lower Mortlake Road.



Pre-app CGI



Pre-app North Elevation

PLANNING HISTORY, CONTEXT & POLICY

NEIGHBOURS' CONSULTATION

Community Engagement

The project team placed great importance on engaging the local community with the project.

The project team held a virtual consultation to inform residents and other key stakeholders of the proposals.

Flyers were hand delivered to approximately 200 addresses to notify neighbours of the consultation meeting.

- Flats 1a – 1d, 1-11, Eminence House, 76 Lower Mortlake Road
- Flats 1-12 The Vetro, Lower Mortlake Road
- No's 137 – 181 Lower Mortlake Road
- No's 2 - 39 West Sheen Vale
- No's 1-22 Sheendale Road
- No's 2 to 50 (Even) Beaumont Avenue

Response

Regrettably there was a limited response with only three neighbours responding to the flyer expressing interest in attending. Only one neighbour attended the meeting. The project team remains open to engaging should anyone come forward.

NEIGHBOURS' CONSULTATION

PROPOSED DEVELOPMENT OF INDEPENDENCE HOUSE

Dear Neighbour

William Grant & Sons and Wimshurst Pelleriti Architects (WP) would like to invite you to a public consultation in order to review their proposals for Independence House at 84 Lower Mortlake Road.

The consultation will take place via webcam on **Monday 6th November at 7pm**. We will be giving a brief presentation with opportunity for each attendee to ask questions and give comments at the end. Please email info@wp.uk.com to register your details. We will then forward an invitation to attend the virtual meeting.

Project Background

The owner of the site, William Grant & Sons, occupied the site as its regional headquarters for nearly 20 years. However in 2020, the company moved to new premises in Richmond town centre. At around the same time, a scheme was developed and planning permission secured (Ref. 20/3359/FUL) to extend and refurbish the building for its existing office use, with the view to attracting a long term commercial tenant.

Unfortunately, due to the current economic climate and trend towards home working, it has not been possible to let or sell the site, in either its current state or prospectively refurbished. Hence the building remains vacant.

Therefore, a new proposal has been developed to retrofit and refurbish the building whilst changing the use to residential. The proposal seeks to provide high quality homes, giving the building a new lease of life and ensuring its viability for the future.

Wimshurst Pelleriti has been appointed to develop a proposal for the site which responds to local need and character.

The proposal seeks to significantly enhance and upgrade the building including its visual appearance whilst making some modest extensions, in line with the consented scheme.

Before we apply for planning permission for these changes we would like to discuss them with you. If you have the time please meet us online on **Monday 6th November**.

We look forward to hearing from you.

Wimshurst Pelleriti



Site Location



Existing Building

Neighbours' Consultation

Please join us at our neighbours' consultation:

When: Monday 6th November 2023
7:00pm
Where: Virtual
Contact: Wimshurst Pelleriti
0208 780 2206
info@wp.uk.com



Wimshurst Pelleriti

Consultation flyer

CASE FOR CHANGE OF USE TO RESIDENTIAL

Introduction

A full planning statement (with heritage) by First Plan has been submitted to accompany this application. The planning statement addresses all relevant policy matters with regards to the application. The summary notes on this page outline the principle case for change of use relating to policies LP41 and LP42 which set out provision and criteria to preserve the retention of offices within the borough.

The following reports have been submitted in support of this position, with key conclusions of each listed for reference.

Marketing Report and Evidence

A fully evidenced marketing report by Sterling Shaw has been submitted in support of this application. This document outlines the market position and the marketing activities that have been undertaken to date. These are summarised as follows.

- Significant and sharp downturn in the demand for commercial office space, both locally and nationally.
- The building has been widely marketed for over 3 years, both as existing and consented.
- No ongoing enquiries.
- Previous enquiries cited concern regarding location, 10 minute walk from town centre.
- Better placed grade A offices available in Richmond town centre, with far superior access to amenities.
- Substantial rise in build cost since approval means that the consented scheme is no longer viable to implement speculatively.
- Building set to remain unoccupied for the foreseeable future.

**Employment Evidence Report
Richmond Draft Local Plan Consultation
(Regulation 19 Representation)**

William Grant & Sons Ltd commissioned Lichfields to prepare evidence to accompany representations to the London Borough of Richmond ('LB Richmond') Publication Draft Local Plan (Regulation 19) Consultation, in relation to seeking the exclusion of Independence House, 84 Lower Mortlake Road, Richmond TW9 2HS ('the site') from the existing and proposed Key Business Area.

The Lichfields Employment Evidence report is submitted in support of this application. The conclusions of this report are repeated as follows.

- The Council's latest employment evidence, (April 2023 ELPNA Update), identifies a requirement for 22,860 sq.m of office space over the study period to 2041, which is significantly lower in scale than that identified by the earlier 2021 ELPNA study.
- This evidence acknowledges high vacancy rates in the Boroughs office market, and recommends a notable change in approach through planning policy to respond to this, concluding that the short-term efficient operation of the office market in the Borough would not be affected if some of the Borough's existing vacant floorspace was lost.
- Despite this definitive conclusion, the Council's proposed approach through the emerging Local Plan is to maintain its strict 'no net loss of office floorspace' policy which features in the adopted Local Plan but has proved to be wholly ineffective over recent years, with the overall stock of office space gradually declining. This approach is no longer justified by the Council's own latest employment evidence and therefore cannot be considered sound.
- A more flexible and pragmatic approach is now required through proposed Policy 23 in order to respond to the significant supply of functionally redundant office space that exists across the Borough's office market and to more effectively encourage provision of high quality accommodation that better meets the needs of local businesses. An overly-protective approach towards retaining existing surplus office accommodation – such as Independence House – risks stymieing the ability of the market to deliver future office space of the type and location that is more aligned to modern business needs over the next Local Plan period. This runs counter to the provisions of National Planning Policy Framework (NPPF) paragraph 82 which requires policies to "allow for new and flexible working practices".

- Through its proposals for Independence House as a Key Business Area, the Publication Draft Local Plan has taken forward a **legacy designation that was based on an assessment last undertaken eight years ago**. Since then, the market has undergone significant structural change and the building has been vacant for the last three years. The continued designation of Independence House as a Key Business Area in the Publication Draft Local Plan is not supported or justified by the Council's evidence base nor the latest market signals presented in this report.
- The Borough's pipeline of office space supply is more than sufficient in quantitative terms to accommodate future office needs identified by the Council's latest (2023) ELPNA. The Council's proposed mixed use allocations appear to offer good prospects to bring forward the type of office product particularly sought after by local businesses, i.e. high quality, small scale office provision/units. The loss of office floorspace at Independence House would therefore have no material effect upon the overall demand/supply balance for office space across the Borough over the new Local Plan period, nor on the performance of the current office market in Richmond.
- Moreover, Independence House makes no contribution to the Richmond local economy or office market and has not done for a number of years since owner occupiers WGS vacated the building in 2019. The building's location on Lower Mortlake Road – an 'out of town' location in office market terms – is no longer attractive to office occupiers seeking accommodation in Richmond town centre. The building requires extensive refurbishment to bring it up to the minimum standard required by occupiers, although in the current market this remains financially unviable to proceed with.
- Declining take-up of Grade A office space in Richmond town centre over recent years has resulted in a chronic over supply, which could take nearly 12 years to absorb based on recent take-up rates. This significant quantum of immediately available supply – all of which is located within Richmond's 'core' town centre – offers clear competitive advantages over Independence House. Market signals evidence, including an extensive marketing campaign for nearly three years, indicates no realistic prospect of Independence House becoming re-occupied in the foreseeable future.



RICHMOND TOWN CENTRE
CLASS A OFFICE SUPPLY CHAIN

250,000 ft²

AVAILABLE WITHIN NEXT
12 MONTHS



AVERAGE OFFICE TAKE UP

22,000 ft²

PER ANNUM



RICHMOND OFFICE SUPPLY

11+ Years

AT CURRENT RATE OF SALE

Info-graphic highlighting Richmond town centre supply chain.

PLANNING HISTORY, CONTEXT & POLICY

VACANT OFFICES IN RICHMOND & SUPPLY CHAIN


Current Grade A Office Supply Chain

The map adjacent illustrated the location of current Grade A office supply chain properties, as per Sterling Shaw's Marketing report. Further to the grade A supply highlighted there is another 68,000sqft of Grade B office available within the town centre.

No.	Address	NET Area (sqft)
1	One Castle Yard	20,645
2	80-82 George Street	25,000
3	Explore, Paradise Rd	43,450
4	Evergreen Studio	15,000
5	Richmond Brewery Stores	6,500
6	Holbrook House	2,274
7	Sheerwater House	2,000
8	Holbrook Studio	10,000
9	3 Water Lane	9,624
10	1 Eton Street	28,379
11	Water Lane Building	6,699
12	Independence House	15,467
13	Palm Court	17,000
14	63 Kew Road	32,500
15	Midmoor House	2,000
16	Greenside (Iloyds)	15,231
17	Peregrine House	11,202
TOTAL		262,971

 LB Richmond - Designated Key Office Areas

 Currently Available

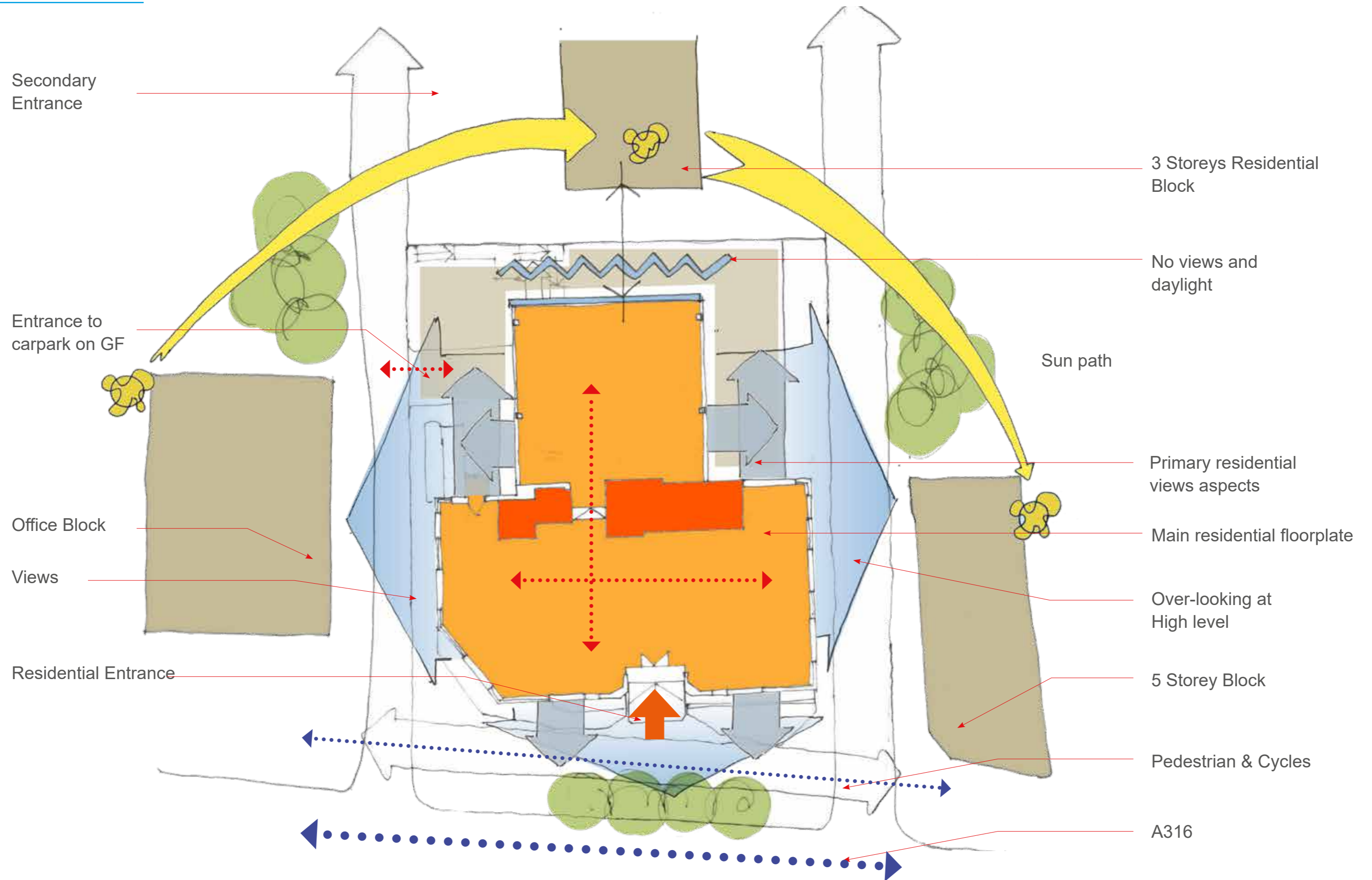
 Available within 12 Months



04. DESIGN APPROACH

DESIGN APPROACH

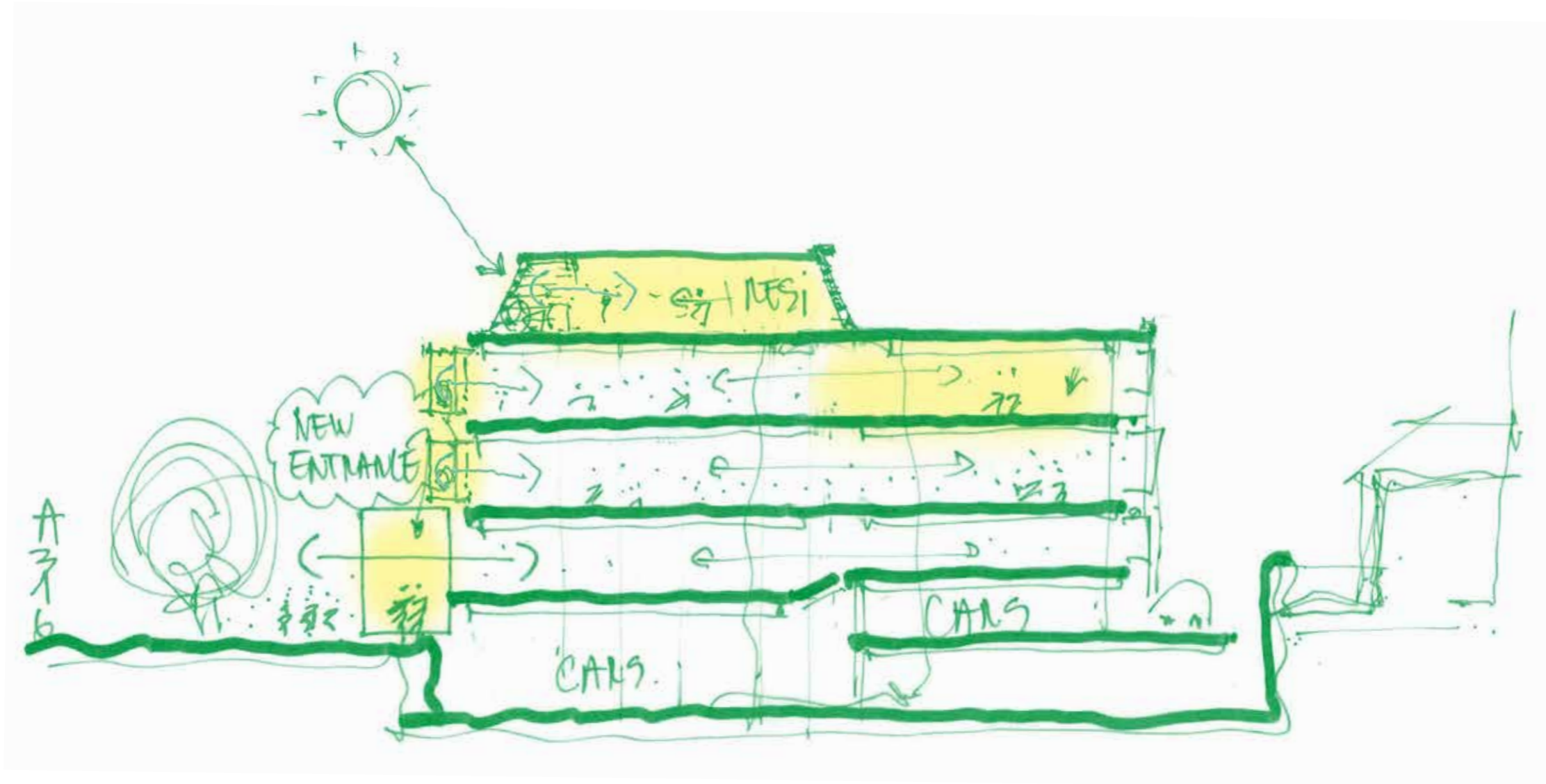
ANALYSIS OF THE SITE



INDEPENDENCE HOUSE - RESIDENTIAL CONCEPT

Concept Sketch Section

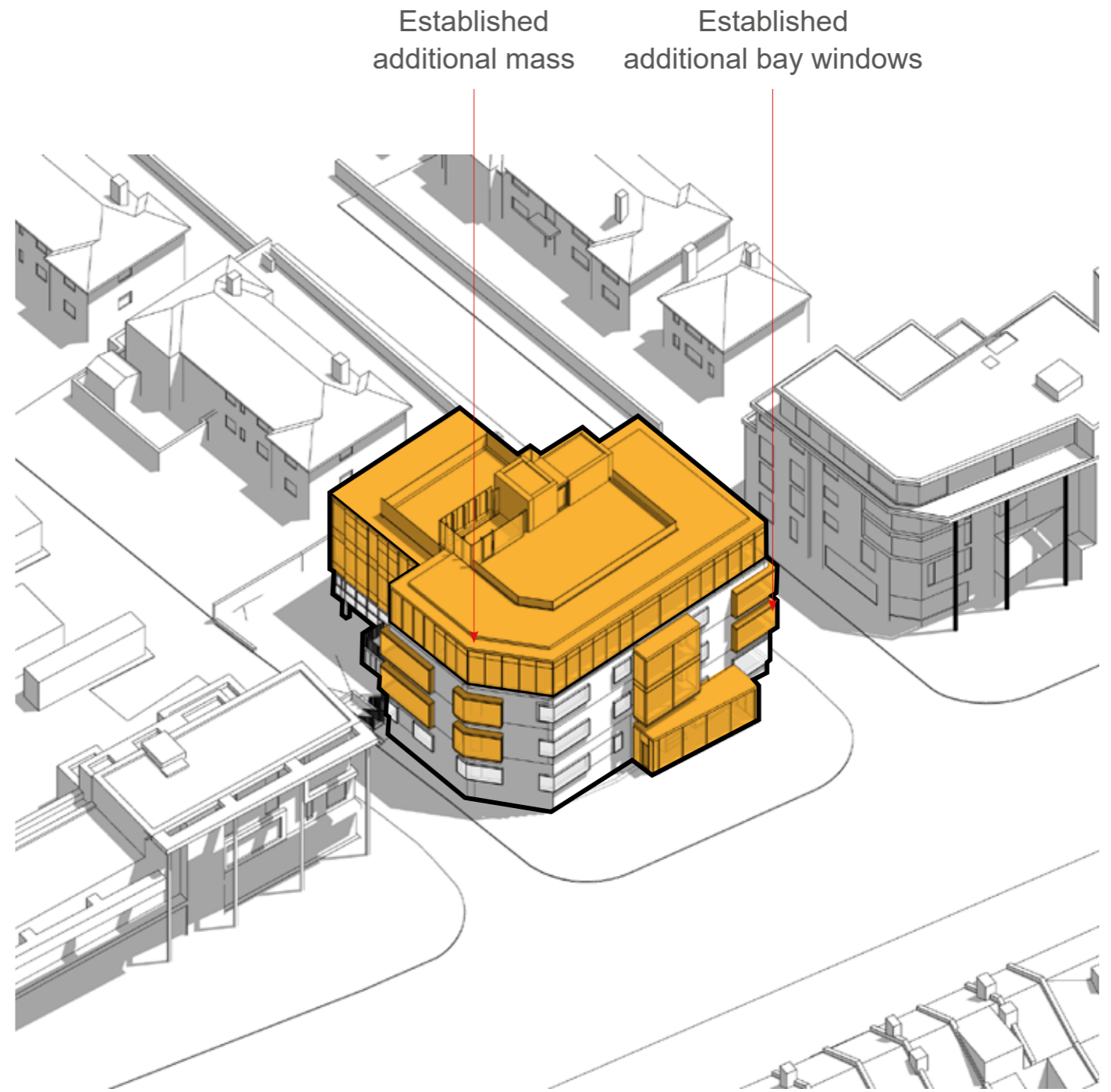
Concept sketch highlighting the proposed new massing volumes, broadly in line with the consented scheme, with a softer mansard roof form.



DESIGN APPROACH
SITE MASSING CONCEPT

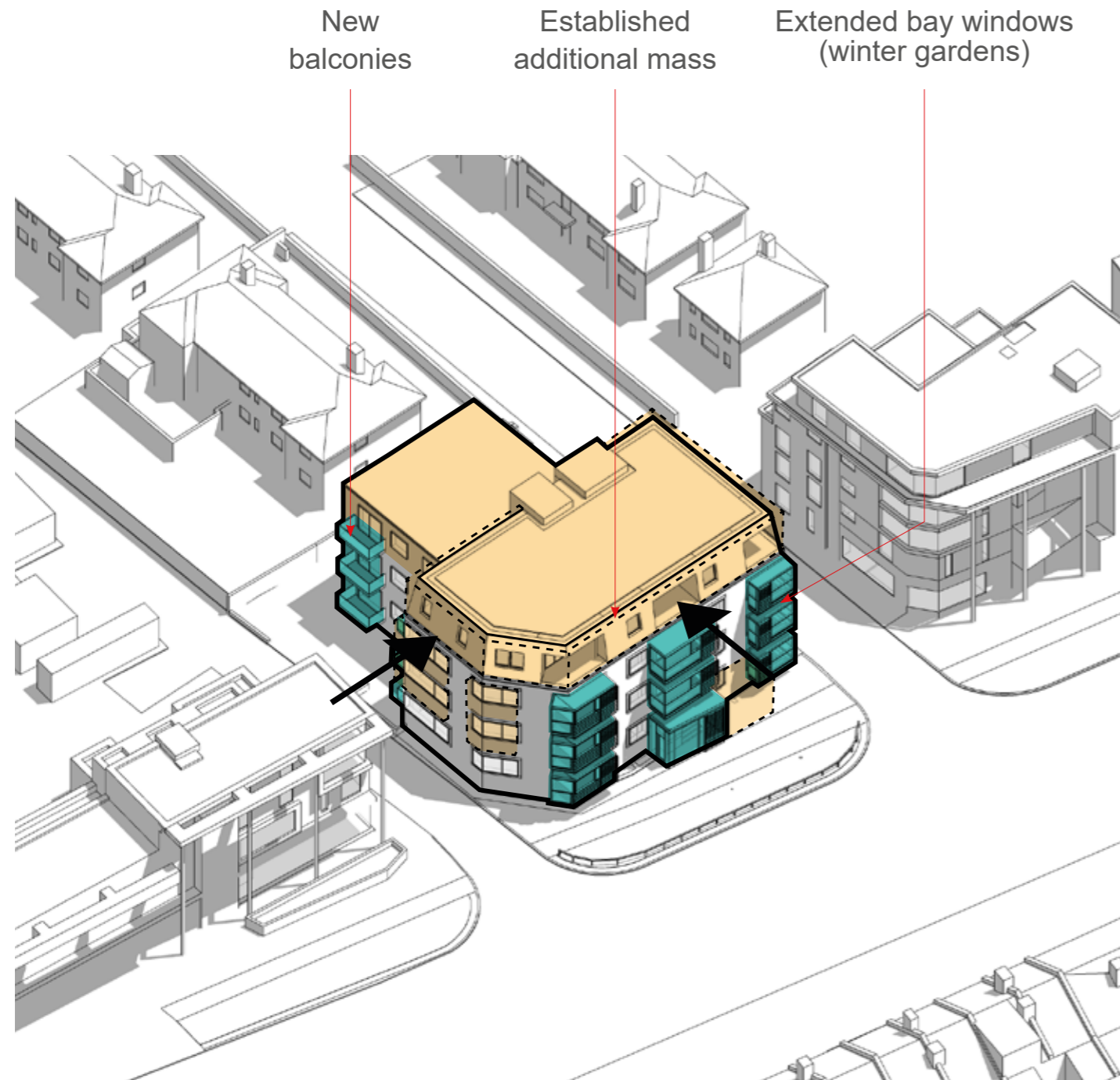


01. Existing Building

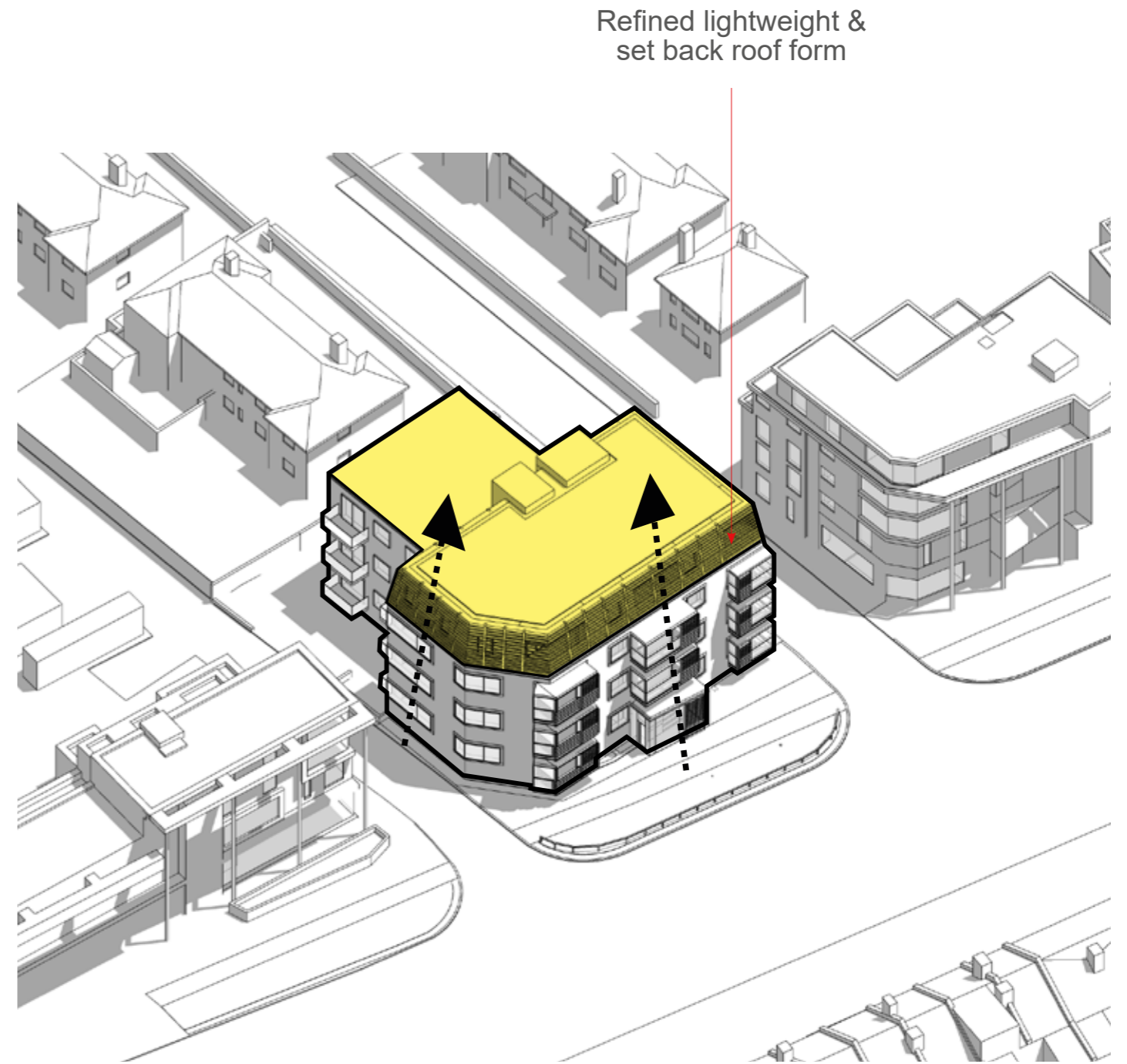


02. Approved Commercial Scheme

DESIGN APPROACH
SITE MASSING CONCEPT



03. Proposed New Massing



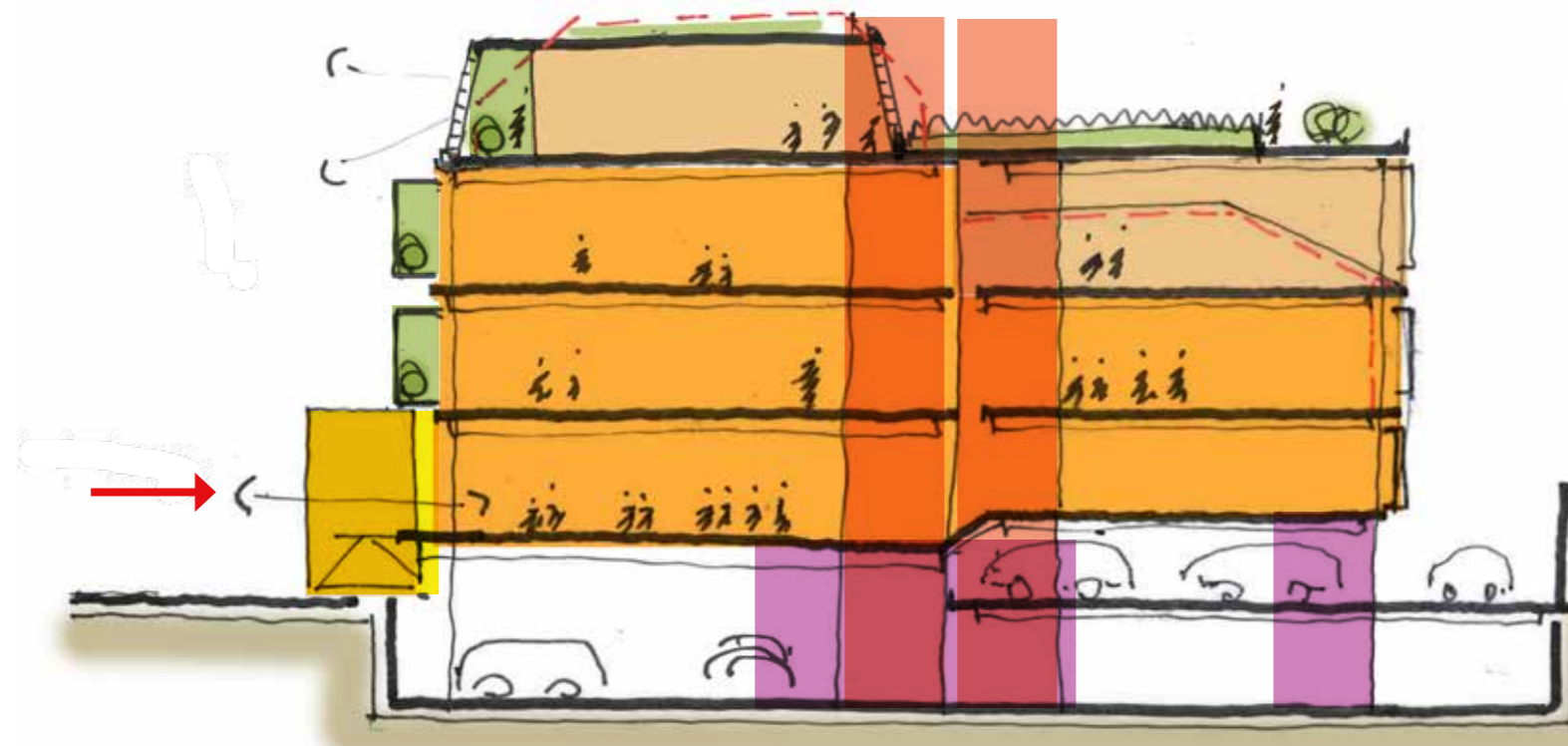
04. Proposed Scheme

DESIGN APPROACH

BUILDING ORGANISATION DIAGRAM



Precedents



- Fully refurbished Core & Services
- Fully refurbished residential floorplates
- Main Reception / Entrance
- New residential additional
- Residential amenity spaces
- Service / communal amenity spaces

Building organisation sketch diagram

DESIGN APPROACH
CONTEMPORARY STYLE



Precedents



Existing building



Concept sketch

05. PROPOSAL

PROPOSAL

STREETSCAPE ELEVATIONS - LOWER MORTLAKE ROAD



**Existing
Street Elevation - South side Lower Mortlake Road**



**Consented
Street Elevation - South side Lower Mortlake Road**

PROPOSAL

STREETSCAPE ELEVATIONS - LOWER MORTLAKE ROAD

View looking east along Lower Mortlake Road



Existing



Consented



Proposed

Comparative massing views illustrating that the proposal sits comfortably within the consented envelope



Proposal
Street Elevation - South side Lower Mortlake Road

PROPOSAL

STREETSCAPE ELEVATIONS - CROFTON TERRACE



Existing
Street Elevation - East side Crofton Terrace



Consented
Street Elevation - East side Crofton Terrace

PROPOSAL

STREETSCAPE ELEVATIONS - EAST & WEST

Site view look north along West Sheen Vale



Existing

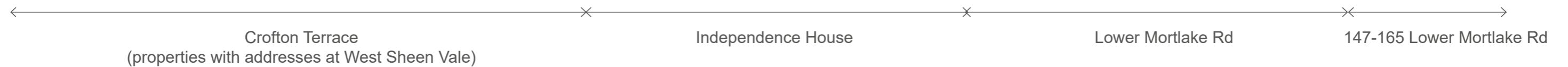


Consented



Proposed

Comparative massing views illustrating that the proposal sits comfortably within the consented envelope



Proposal
Street Elevation - East side Crofton Terrace

PROPOSAL

BUILDING ORGANISATION - GROUND FLOOR PLAN



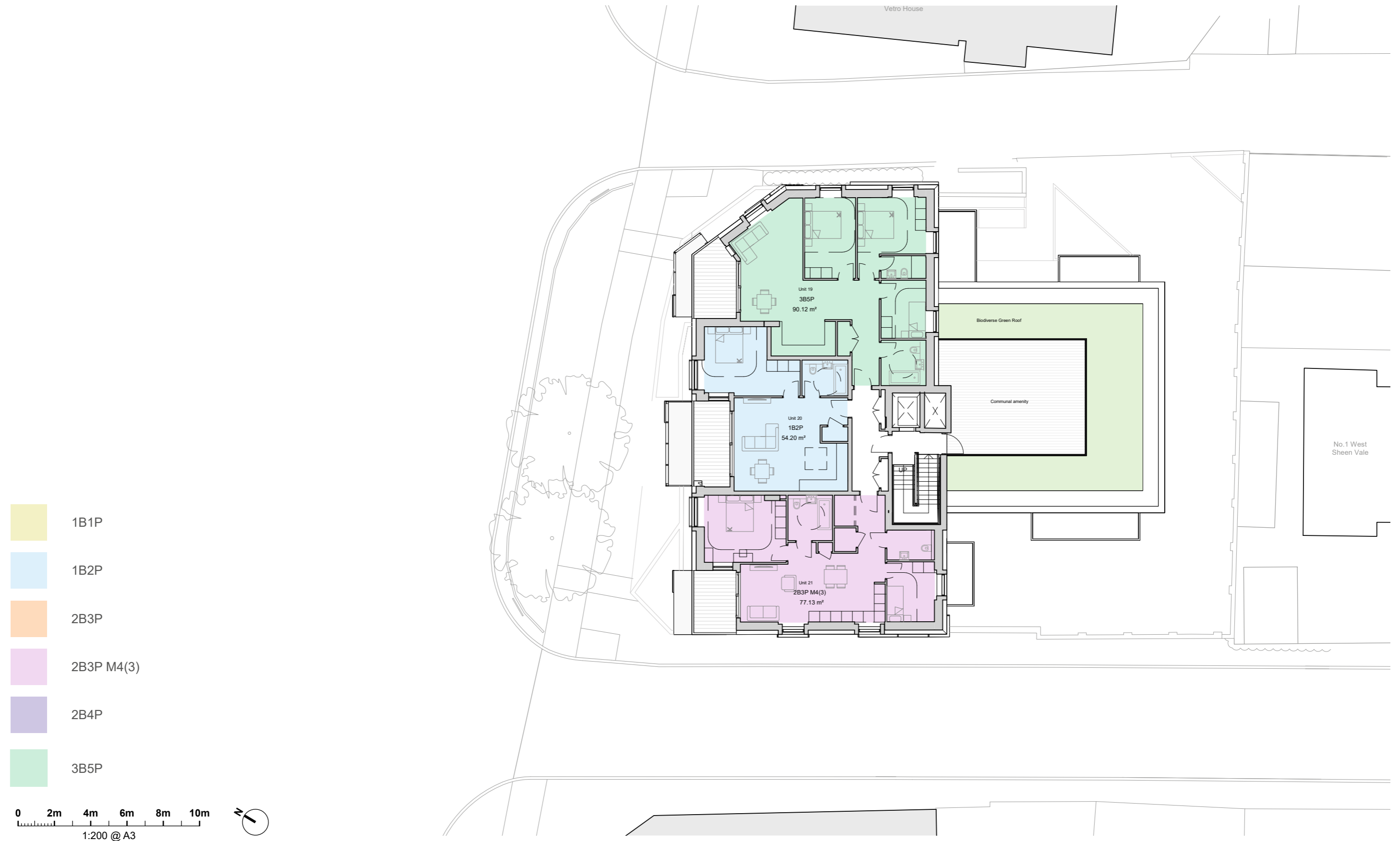
PROPOSAL

BUILDING ORGANISATION - FIRST & SECOND FLOOR PLAN

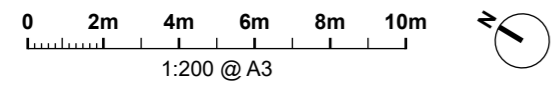


PROPOSAL

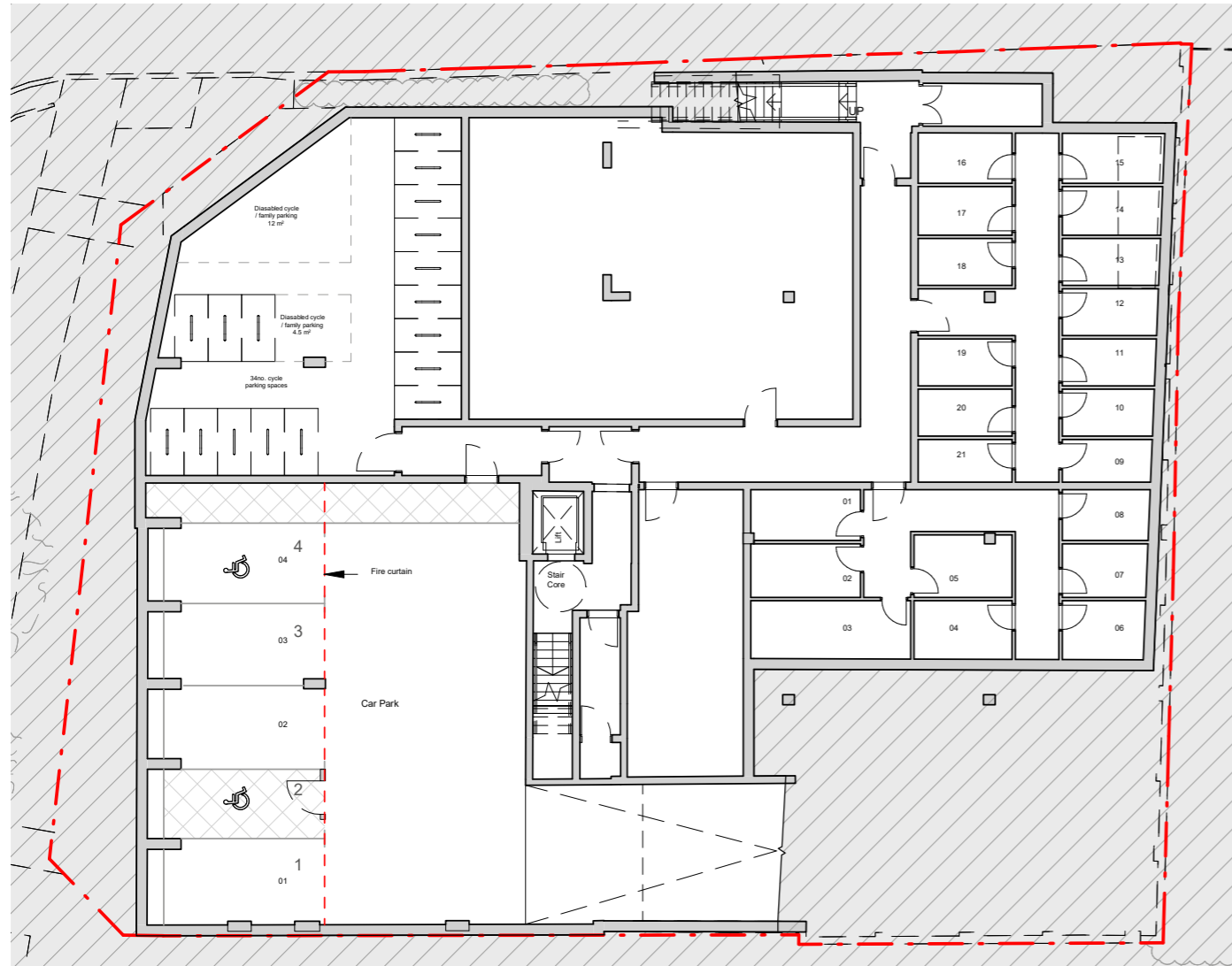
BUILDING ORGANISATION - THIRD FLOOR PLAN



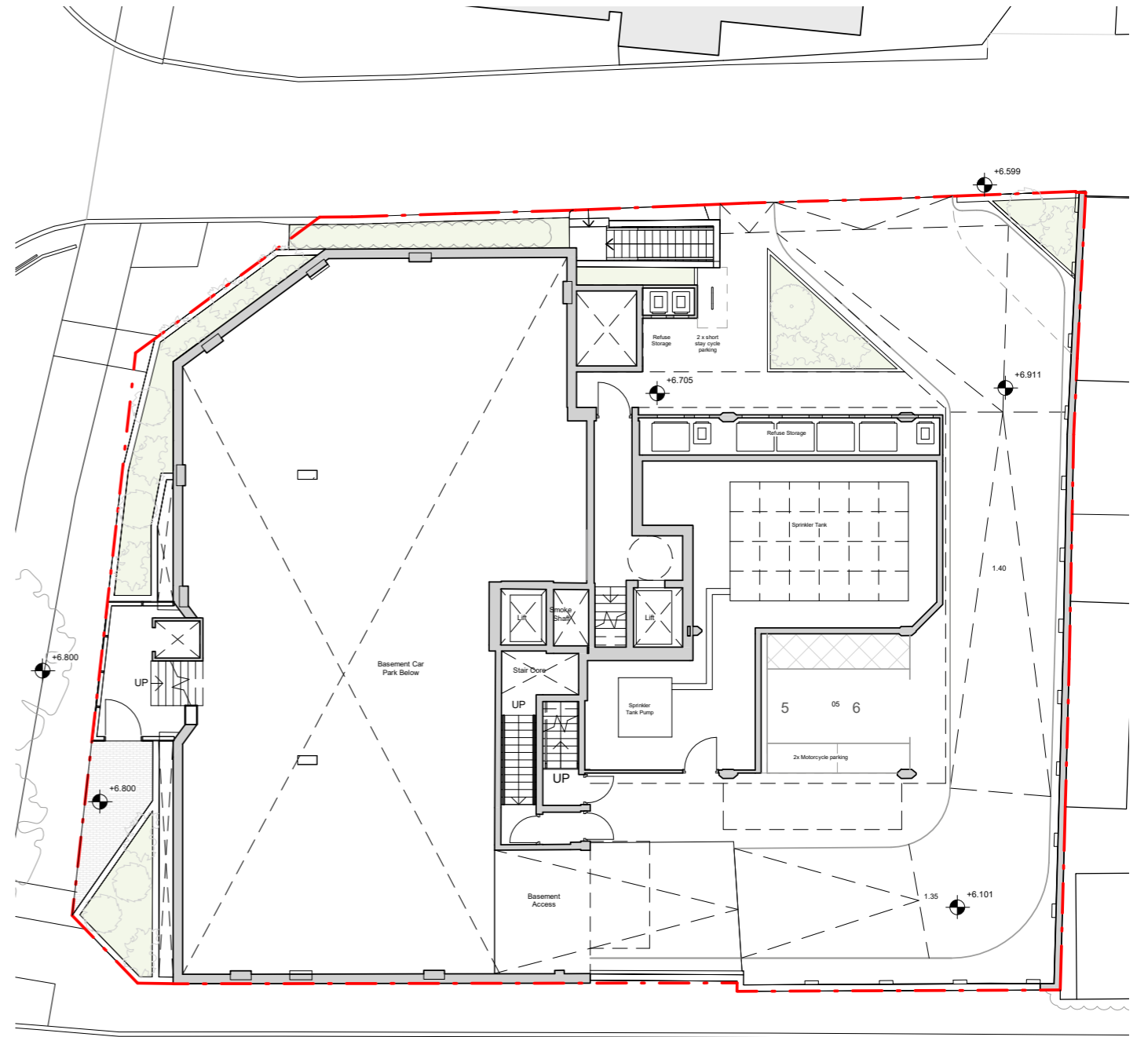
- 1B1P
- 1B2P
- 2B3P
- 2B3P M4(3)
- 2B4P
- 3B5P



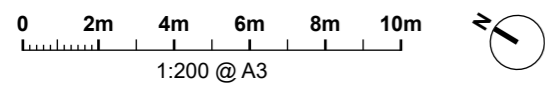
BUILDING ORGANISATION - BASEMENT & STREET LEVEL PLANS



Basement Plan



Street Level Plan



PROPOSAL
PROPOSED ELEVATIONS



North Elevation

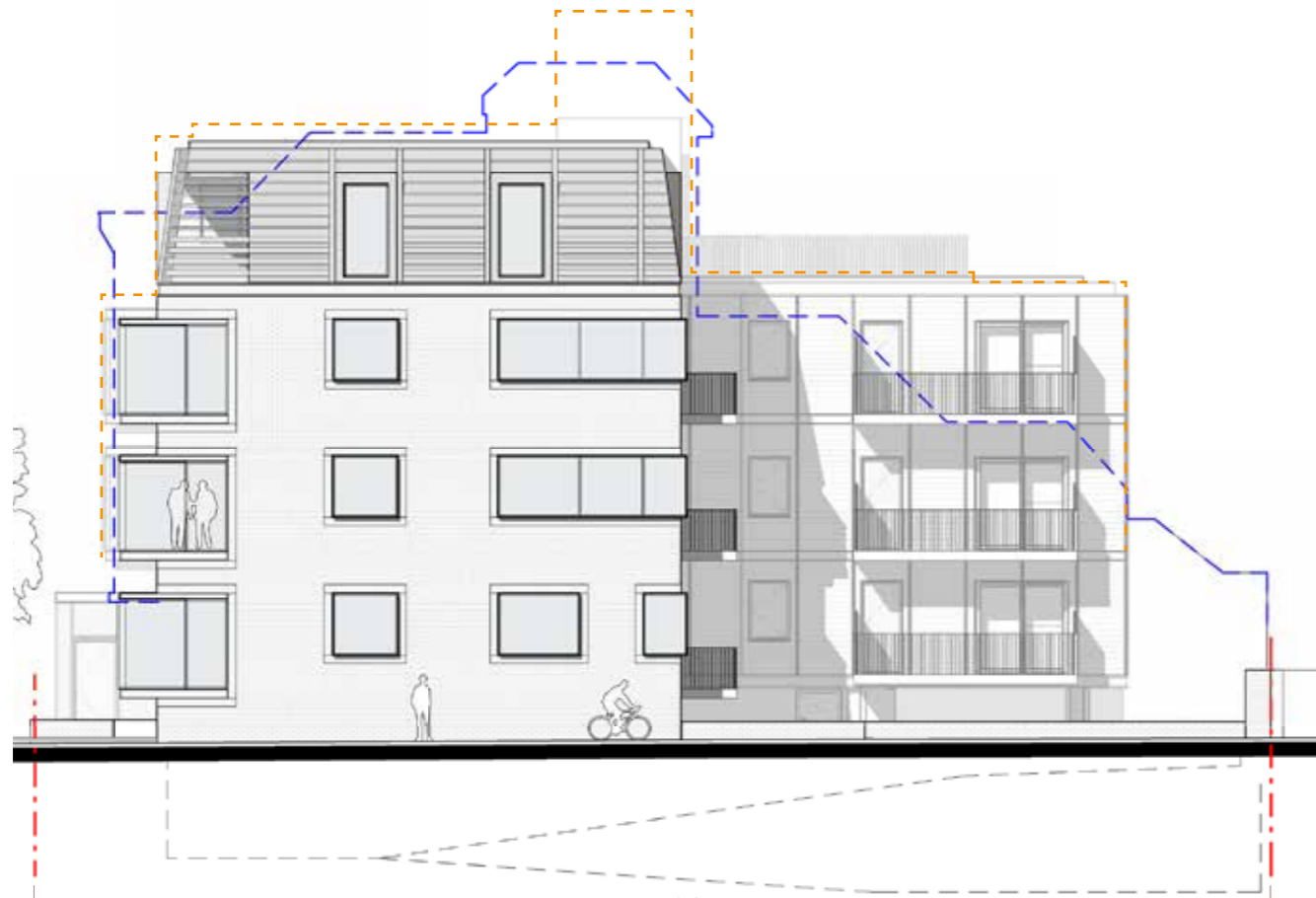


South Elevation

- Consented Envelope
- Existing Envelope

0 2m 4m 6m 8m 10m
 1:200 @ A3

PROPOSED ELEVATIONS

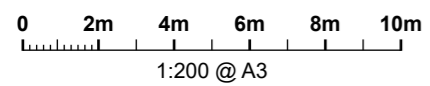


West Elevation



East Elevation

- Consented Envelope
- Existing Envelope



PROPOSAL

ELEVATIONAL STUDY - MATERIALITY CONCEPT

Overview

The chosen material palette has been selected to achieve the following principles:

- Complement the character and tonality of the building, as well as the surrounding context.
- Consistently applied detail and materials to create a cohesive development.
- Durable, low maintenance and sustainable.
- Existing brickwork retained, cleaned and repointed



Timber frame / louvres



or Ceramic / Terracotta Louvres



Green Wall / Lattice



Steel channel with clear glazing



Proposed North Elevation

PROPOSAL

ILLUSTRATIVE VIEW - LOWER MORTLAKE ROAD



Proposed CGI - Lower Mortlake Road



Existing street view

PROPOSAL

IMPROVED URBAN REALM & HARD LANDSCAPING

Entrance Experience

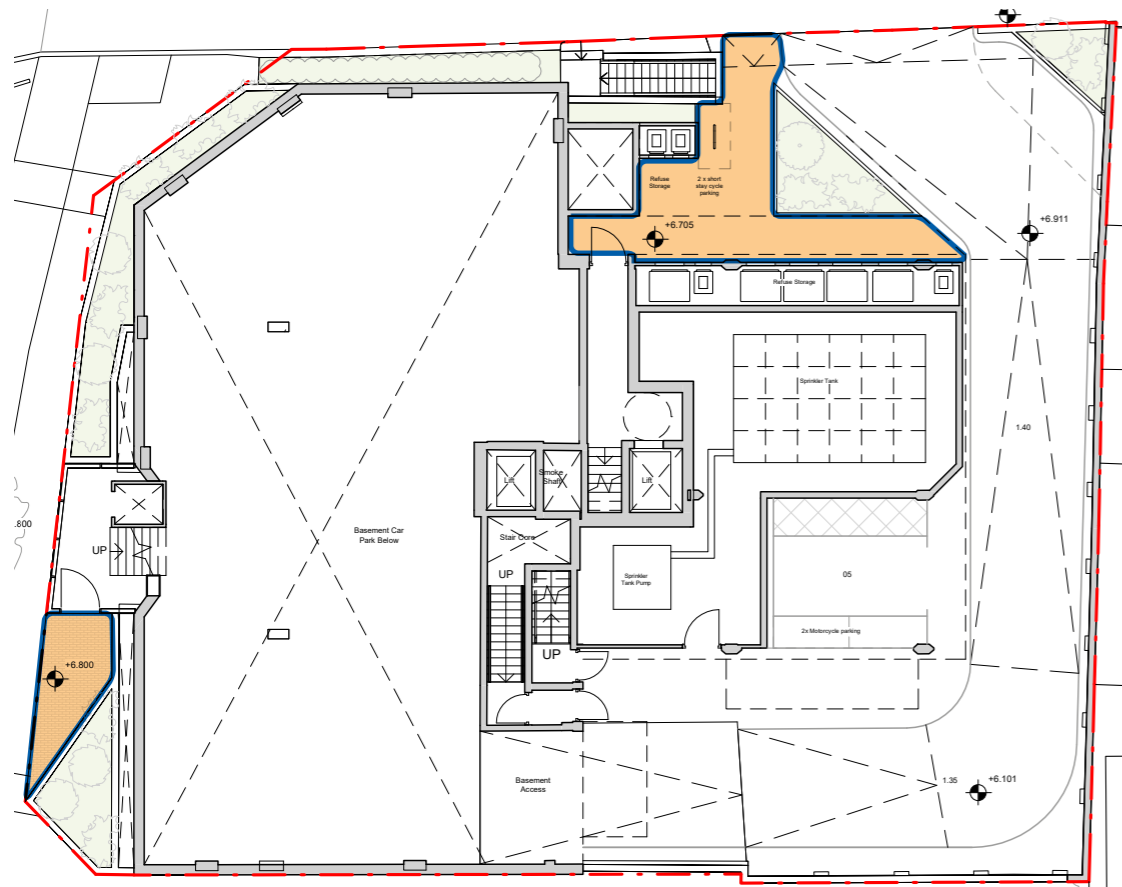
A new entrance lobby is proposed which will improve the building frontage and significant enhance the public realm.

The hard landscaping scheme has been designed to be high quality, robust and hard wearing. The colours, sizes have been selected to compliment each other whilst providing a clear and legible hierarchy of spaces. High quality long format concrete paving blocks are proposed where the building frontage meets the street.

At the rear of the site, the existing hard standing (which is largely over the existing basement structural slab) will be refreshed. Pedestrian areas around the refuse store and rear entrance will be treated with the same paving as the frontage.



Proposed CGI - Entrance from Lower Mortlake Road



Long format concrete paving blocks

Existing brick planters, reshaped and planted with flower rich perennials.

Green wall climbers

PROPOSAL

SOFT LANDSCAPING

Proposed Planting Strategy

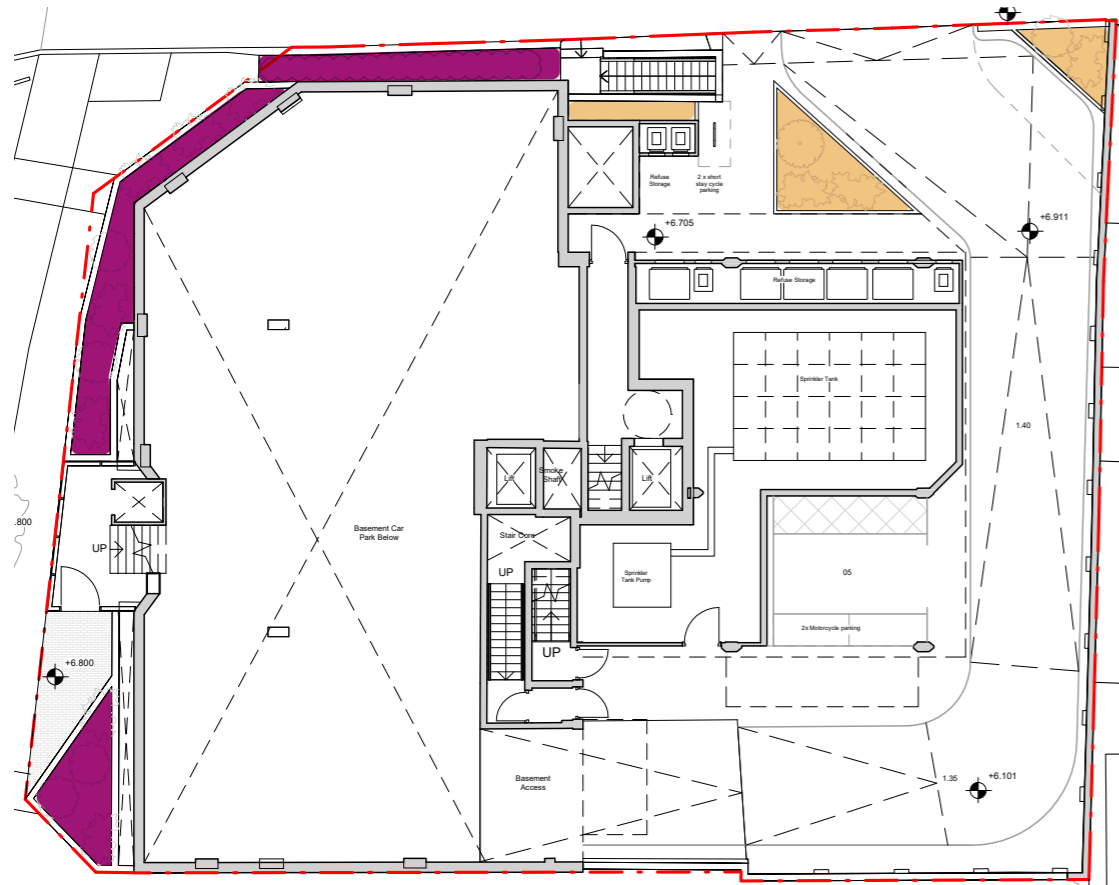
The planting approach aims to balance ecology, amenity and aesthetics. A combination of evergreen ground covers balance deciduous shrubs and herbaceous perennials. Particular attention is given to plants that attract pollinating insects and can provide habitat's for invertebrates.

The planting species proposed are those that require relatively low maintenance with only occasional visits and simple pruning required throughout the year.

The ecology report recommends the following enhancements:

- 8 x Integrated bird boxes
- 4x Integrated bat boxes
- 4 x Bee Brick
- 2 x Bug Hotels

For full details of the site ecology, please refer to the full report. Note final locations of the above recommendations should be confirmed by an ecologist on site.



Astrantia major



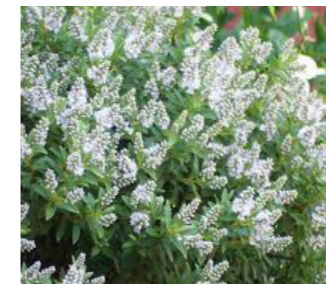
Hydrangea 'Annabelle' AGM



Stipa tenuissima



Hakonechloa macra



Hebe whitewand



Aster frikartii



Hydrangea serrata



Hypericum hidcote



Pennisetum alopecuroides



Lavandula angustifolia



Rudbeckia fulgida



Verbenia bonariensis



Geranium 'Johnson's Blue'



Alchemilla mollis



Liriope muscari



Geranium macrohizum



Brunnera macrophylla



Polystichum setiferum



Cyrtomium fortunei



Asarum europaeum

PROPOSAL

NEIGHBOURING AMENITY - MITIGATING IMPACT

Screening

As outlined within the pre-app response, the position and orientation of the proposed windows and balconies has been considered to protect neighbouring properties from overlooking. 1.8m high privacy screens are proposed on balconies to prevent undue over looking and are indicated on the planning elevations. Within the front four storey element of the building, window positions are largely in their existing location. However on the north elevation, the window openings have been increased to provide winter gardens, facing onto Lower Mortlake Road.



Proposed West Elevation



Proposed South Elevation

PROPOSAL

SUSTAINABILITY STATEMENT

Energy Strategy

An energy and sustainability strategy document by Quinn Ross has been provided to support this application. The key principles are outlined below:

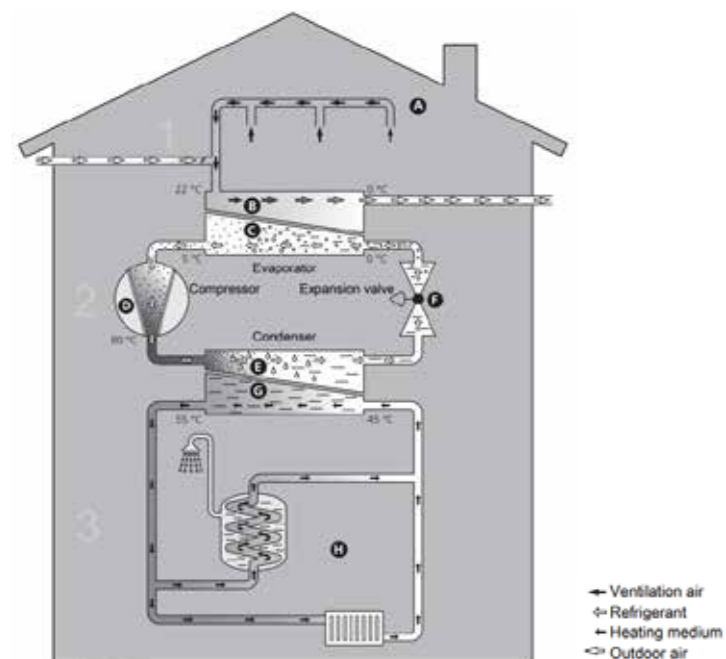
- Fabric first approach.
- Maximising energy efficiency through passive measures.
- Low U-values and low air permeability (beyond building regulations).
- Heating and hot water from the latest and most efficient exhaust air heat pumps (EAHP).
- Solar panels on roofs.
- Aim to meet the zero-carbon policy of the London Plan 2021 only site constraints, not design or costs, has limited this building's zero CO2 credentials.
- Heating and hot water with zoned temperature control.
- Energy efficient Low Energy Lighting (L.E.L).

PV Solar Panels

PVs are located at roof level taking advantage of the large surface area and favourable aspect.

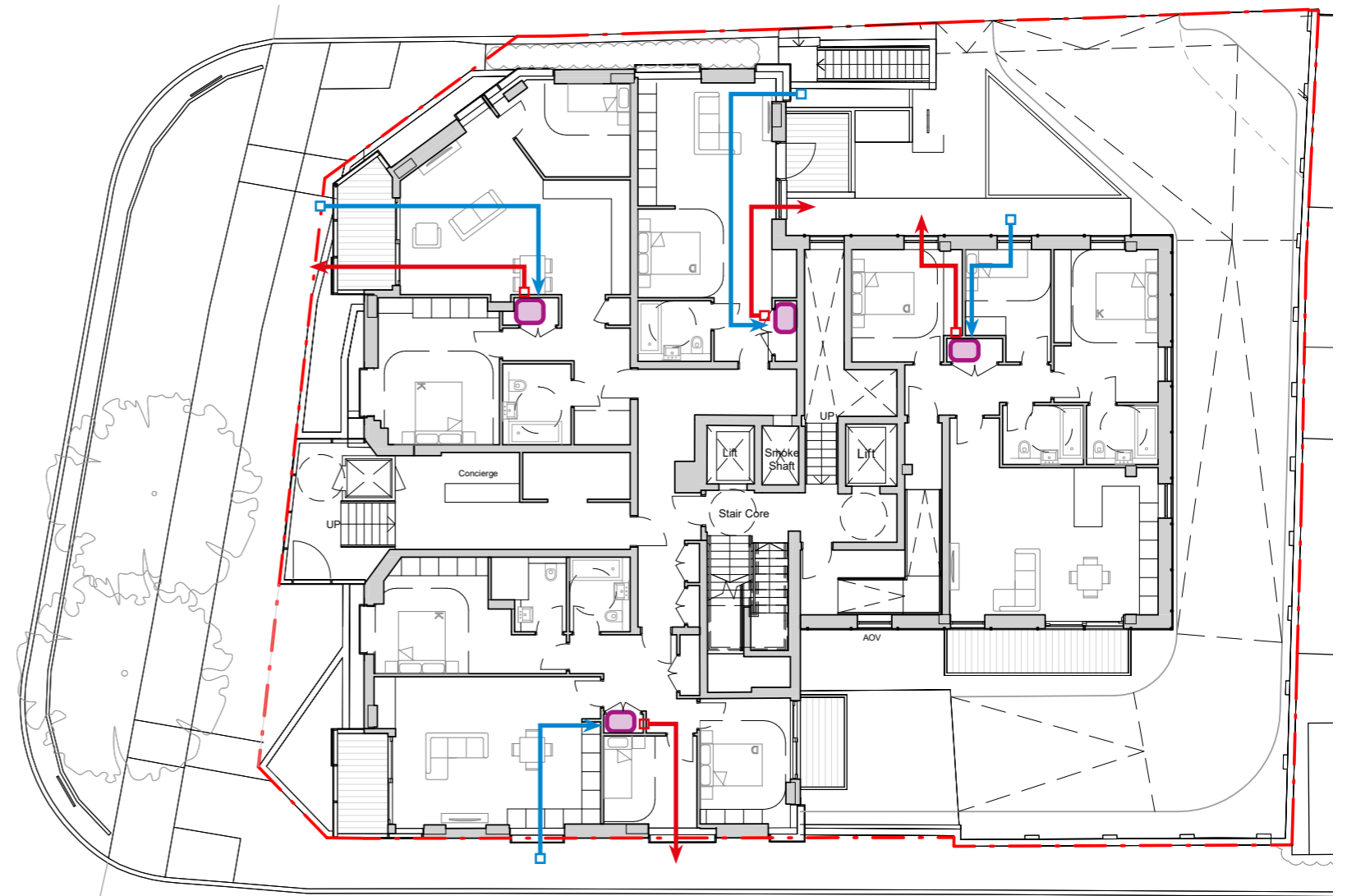
Exhaust Air Heat Pumps (EAHP)

Each unit is served by an individual EAHP that provides heating, hot water and mechanical ventilation. Similar to MVHR the EAHP is ducted to the facade. The adjacent diagram highlights the typical location within the units' utility cupboards.



Acoustic Mitigation

An acoustic report by KP acoustics has been provided to support this application. No external plant is proposed, therefore no specific mitigation is required. However the report sets out the acoustic criteria that the building fabric will be designed to achieve.



Ground Floor Plan Diagram

- Exhaust Air Heat Pumps (EAHP)
- ← Intake Air
- Extract Air

Example ASHP enclosure

SUSTAINABILITY STATEMENT

Resource Use & Carbon Emissions

Reusing, refurbishing and extending existing buildings for longer life is a more carbon efficient alternative to demolition and new build. It is also a more cost effective, quick and inherently sustainable means of delivering housing to address rising demand without consuming open space.

Utilising existing building stock as a resource also has a direct benefit in terms of reducing Whole Life Carbon emission of housing stock. Whole Life Carbon is comprised of operational carbon emissions, produced by the building in use, and embodied carbon, used upfront in the construction of the building.

Furthermore the proposal incorporates a PV panel array at roof level, providing carbon free electricity generated on-site. This will reduce electricity drawn from the grid.

Roof Extension Sustainability

The key benefits of this approach and the scheme are as follows.

- Reduce the amount of virgin material used in the project.
- Removes the need for groundworks and foundations which typically account for 21% of embodied carbon emissions during construction of small- to medium-scale housing developments.
- Utilises existing infrastructure, road, utility connections, drainage etc.
- Does not consume any open space, reducing pressure on open land which can be retained for public benefit and provide habitats for wildlife.
- Provides an opportunity to upgrade existing buildings which would otherwise continue to consume too much energy.
- Under-performing elements of the existing buildings, such as the roof, can be removed and upgraded to improve building performance, in turn reducing operational carbon emissions.

Green Procurement

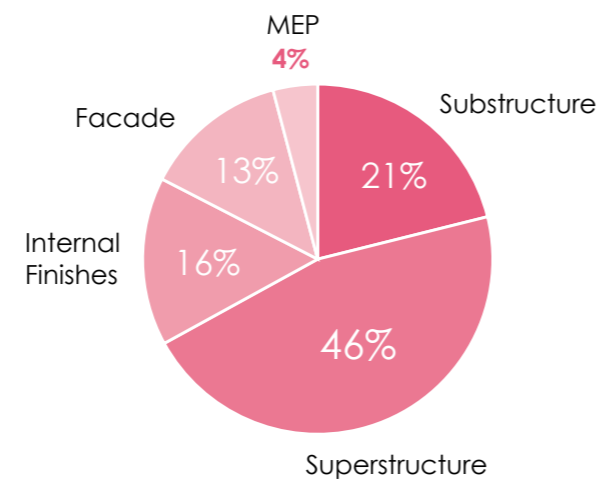
Products and services that have minimal adverse environmental impacts will be incorporated into the scheme.

- Use products with improved recyclability.
- Use products with high recycled content.
- Use products with reduced packaging.
- Use products with greater durability.
- Use products with greater energy efficiency.
- Utilise clean technology and/or clean fuels.
- Reduce water consumption.
- Avoid single-use disposable items.
- Avoid products that emit irritating or toxic substances during installation or use; or upon disposal.

Social and Economic Sustainability

The new development will improve the residential values in the area and could therefore encourage greater economic activity in the area.

Improving the efficiency of the building will reduce costs for future residents.



Typical percentages of embodied carbon in small and medium scale housing developments. Image Ref, LETI Climate Emergency Design Guide.

06. TECHNICAL INFORMATION

TECHNICAL INFORMATION

INCLUSIVE ACCESS STATEMENT

Communal Entrance

A new communal entrance lobby is proposed to the north of the building. Within the lobby a new platform lift and Part M compliant stair is provided to improve the building's accessibility and bring it up to current standards. The proposals will also contribute to the improvement of the public realm within the site demise on Lower Mortlake Road.

Private Entrances & Internal Circulation

Private entrances to the new residential units are from the shared lobby. The main entrance door to the stair offers access to a shared residential lobby containing letter boxes for each of the residential units. Entry systems such as video or audio entry systems will be designed and located to be used by visitors and residents.

Individual unit entrances are accessed from shared landings on upper floor levels.

Part M

All units are proposed to be M4(2) compliant adaptable dwellings with level threshold access. A lift is provided to serve the upper floor dwellings.

Two part M4(3a) adaptable units are provided in the building and are detailed later within this document.

Vertical Circulation

Stairs: One main internal stair, located in the centre of the building, provides access to all levels. This is the same stair that serves the existing building. There are also communal stairs at the front and rear of the building connecting the street level with the upper ground level. The stair widths are all at least 1m width and no wider than 1.8m between handrails. Handrails are at 900mm above nosing level with tonal contrast on the risers. New stairs will conform to the requirements of a general access stair with risers no greater than 170mm and goings between 250mm and 320mm.







Lifts: The building is provided with three lifts. At the front of the building a general access platform lift provides level access between street level and upper ground. There is also a service and evacuation lift access from the rear of the building also serving street level and upper ground. The main lift is in the centre of the building providing level access to all floor levels including the basement. All lifts will have clear internal dimensions of 1100 mm x 1400mm.

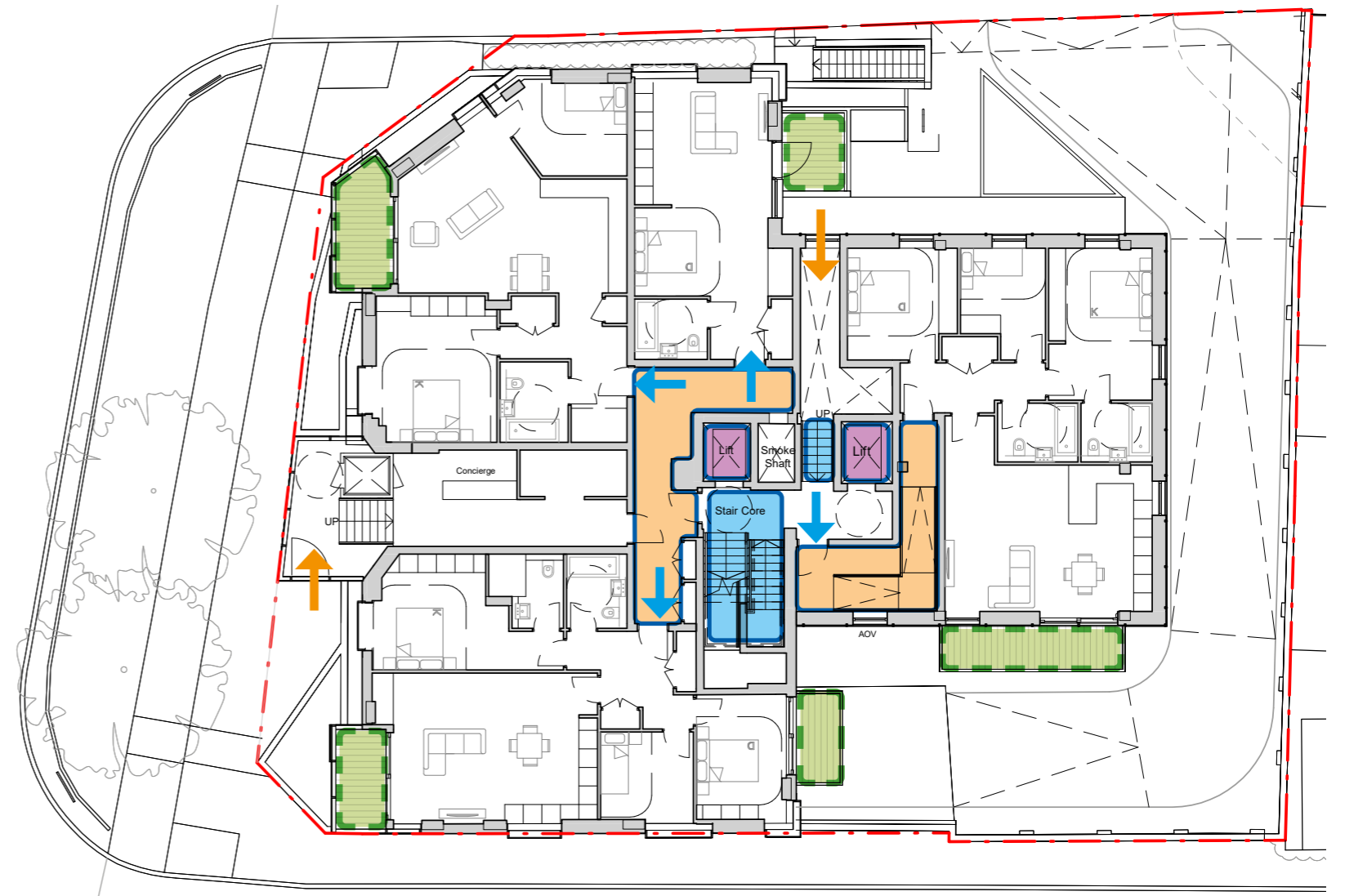
Fire Strategy

A London plan fire strategy document by Cundalls has been submitted in support of this application. The principles of approved document B fire safety have been fully considered. The following key principles have been established whilst the full detailed fire strategy is to be developed during the technical design stage.

- Sprinklers to be installed throughout, building over 11m.
- Evacuation lift(s) installed.
- Emergency lighting to comply with BS5266-1.
- Smoke detector to comply with BS5839.
- Stair core doors to be fitted with 'Fire door keep shut' signage and 'Fire door keep locked' to stores, plant rooms and service risers.
- Appropriate compartmentation to be installed throughout.
- Appropriate travel distances and fire fighting access considered.
- Ventilated communal staircase.

Key

-  Communal Entrance
-  Private Entrance
-  Amenity Space
-  Common access corridor
-  Lift M4(3)
-  Communal Stair



Ground Floor Plan

TECHNICAL INFORMATION

REFUSE, PARKING & CYCLE STORAGE

Public Transport

The site has good public transport links, being located near Richmond station with ample bus services running along Lower Mortlake Road. The current Public Transport Accessibility Level (PTAL) rating for the site location has been determined as Level 6a Excellent.

Car Parking

The proposal will provide 5 car parking space across basement and street levels, of which 2 will be for disabled users, associated with the M4(3) units. This is a significant reduction of 27 bays provided by the existing office scheme.

Cycle Parking

There will be covered and secure bicycle parking spaces provided in the basement. The cycle store is accessible by both lift, stair and vehicular access ramp to the basement.

Refuse Stores

The refuse store is located on street level in a similar location as the existing store, adjacent to the collection point. The refuse store is sized to meet the requirements outlined in Richmond's Waste & Recycling storage SPD document 2022.

As per the SPD document the following containers are required according to the calculations.

Refuse (Residual Waste)	3 x 1100L Eurobins
Paper & Card Recycling	1 x 1100L + 1 x 240L
Mixed container Recycling	1 x 1100L + 1 x 240L
Food Waste	2 x 240L

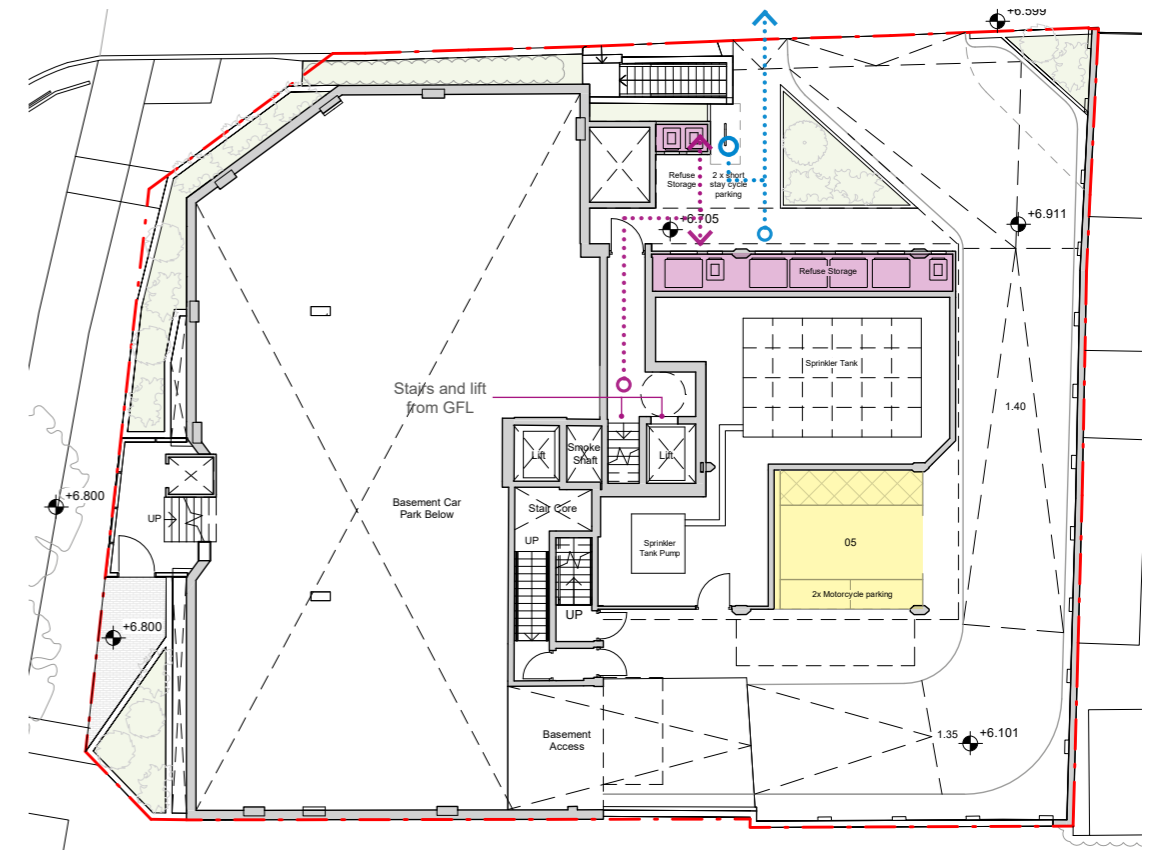


Basement Plan

1. 42no. new secure cycle parking provision in basement
2. 4no. car parking spaces
3. 21no. storage pods

Key

- Resident refuse route
- Local authority Collection (under 10m)
- Amenity Space
- Cycle Store
- Storage Pods
- Refuse store



Street Level Plan

TECHNICAL INFORMATION

RESIDENTIAL STANDARDS STATEMENT & SCHEDULE OF ACCOMMODATION

Residential Standards,

The table adjacent shows how the proposed flats would meet and in many cases exceed the minimum internal space standards. Therefore, the units comply with policy 3.5 of the London Plan and the Nationally Prescribed Housing Standards. Also, it is worth mentioning that consideration has been given to limiting single aspect units, with most units enjoying double or some cases triple aspect. All of the flats benefit from good levels of daylight and will be mechanically ventilated with heat recovery which will aid with heating/cooling.

All double bedrooms meet or exceed 11.5sqm and all single bedrooms meet or exceed 7.5sqm, with the room areas indicated on the planning drawings. Appropriate storage levels are provided in most cases exceeding the standards. Floor to ceiling levels throughout are 2.5m.

As such, the quality of the internal spaces are considered to be of a high quality.

Residential Mix

The proposed housing mix is appropriate for the type of development in a town centre location, as per the levels below.

Unit Type	No.	%
1B1P	3	14.3%
1B2P	9	42.9%
2B3P	2	
2B3P M4(3)	2	28.6%
2B4P	2	
3B5P	3	14.3%
Total	21	

Schedule of Accommodation

Proposed Residential Areas								
Level	Unit Number	Unit Type	Unit GIA (sqm) *	Unit Amenity Area (sqm)	Unit Storage Area (sqm)	Total Sales (sqm)	Level GIA (sqm) +	Efficiency %
G	Unit 1 (Affordable So)	2B3P M4(3)	82.6	7	4.4	308.9	465.4	66.39%
	Unit 2 (Affordable So)	1B1P	41.5	5	2.5			
	Unit 3 (Affordable R)	3B5P	92.6	8.5	4.5			
	Unit 4 (Affordable R)	3B5P	92.2	9.5	3.6			
L1	Unit 5	2B3P	64.4	7	2.2	373.9	462.8	80.81%
	Unit 6	1B2P	50.0	8	2.9			
	Unit 7	1B2P	50.3	7	2.2			
	Unit 8	2B4P	70.3	9	3.5			
	Unit 9	1B1P	37.7	5	1.8			
	Unit 10	1B2P	50.8	6	3.0			
L2	Unit 11	1B2P	50.4	7	2.4	373.9	462.8	80.80%
	Unit 12	2B3P	64.4	7	2.2			
	Unit 13	1B2P	50.0	8	2.9			
	Unit 14	1B2P	50.3	7	2.2			
	Unit 15	2B4P	70.3	9	3.5			
	Unit 16	1B1P	37.7	5	1.8			
L3	Unit 17	1B2P	50.8	6	3.0	221.5	291.9	75.85%
	Unit 18	1B2P	50.4	7	2.4			
	Unit 19	3B5P	90.1	8	3.9			
	Unit 20	1B2P	54.2	8	2.1			
	Unit 21	2B3P M4(3)	77.1	8	3.7			
Totals	21		1278.3			1278.3	1682.8	75.96%

SO - Affordable intermediate shared ownership

AR - Affordable rent

* Unit GIA excludes winter gardens where provided and balconies

+ Level GIA includes Core, Circulation and enclosed balconies (winter gardens) but excludes external balconies

TECHNICAL INFORMATION

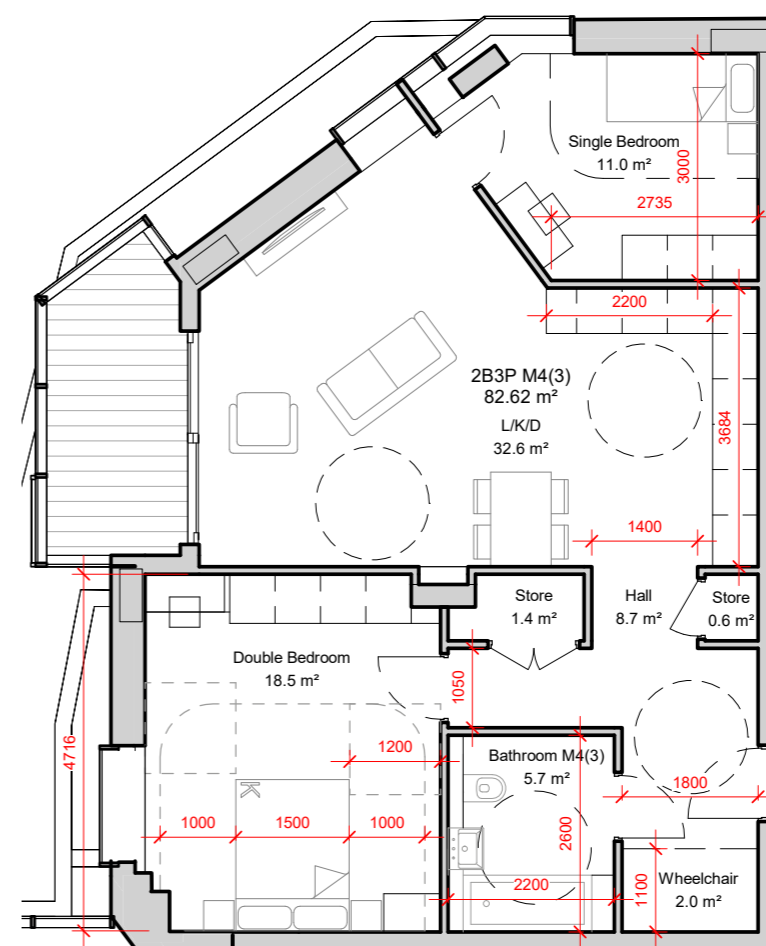
WHEELCHAIR HOUSING STATEMENT

M4(3) Wheelchair Units

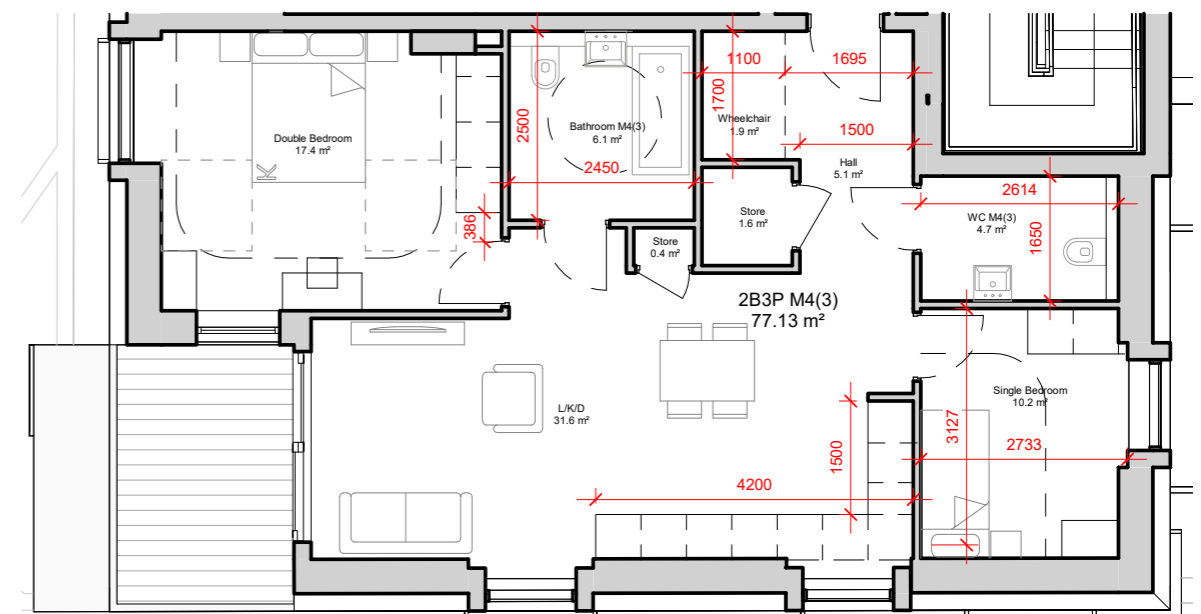
Two wheelchair adaptable units are provided with layouts complying with the requirements of Approved Document Part M4(3) of the Building Regulations.

The layout of the units illustrated adhere to the following key principles.

- Level access to the apartment.
- Every door, including the principal entrance to each home, has a minimum clear opening width of 850mm.
- The entrance area within each home has a minimum width and depth of 1200mm.
- Minimum 1500mm clear turning circle inside the entrance area, in front of the entrance door when closed.
- 300mm nib to the leading edge of all internal doors and with a 200mm nib from hinge edge.
- The minimum clear width of every hallway is 1200mm, with other considerations of diagrams 3.4 & 3.5 within Approved Document Part M4(3) taken into account.
- Adequate length of kitchen worktop.
- Clear 750mm circulation zones to external spaces.
- Wheelchair storage and transfer space (1700mm x 1100mm)



2B3P M4(3) Type 1 - Level G



2B3P M4(3) Type 2 - Level 3

TECHNICAL INFORMATION

AFFORDABLE HOUSING STATEMENT

Economic Viability Assessment Report and Affordable Housing Provision

The Council's policy makes clear that the affordable housing contribution is subject to viability testing. An Economic Viability Assessment report by ULL property has been provided in support of this application and has been compiled in compliance with this policy, National Planning Policy Framework and RICS Guidance.

A summary of the report's findings and the affordable housing offer is outlined below:

- The proposal includes a discretionary offer of affordable housing of 4 affordable homes, 2 being for affordable rent and 2 Intermediate. This equates to 19% of dwellings and 24% of the proposed floor space.
- The benchmark land value of the existing property has been demonstrated to be £826,000 (rounded), (as per Section 7 of the report).
- Viability appraisal concludes that the net residual is -£382,000 (rounded/negative).
- Therefore the proposed scheme cannot support a further contribution towards affordable housing, in addition to anticipated CIL costs associated with the development.
- This is considered to be the maximum reasonable provision of affordable housing which is to the detriment of a market level of profit being achieved in this instance.
- It is proposed that all of the ground floor units would be affordable homes.

Correspondence with Affordable Housing Provider.

Referring to the adjacent correspondence, the client team has approached Richmond Housing Partnership (RHP) regarding the possibility of acquiring /managing the affordable units, or even the entire building. Given that RHP, own and manage all of the properties at Crofton Terrace, RHP have confirmed their interest in Independence House.

The nature of this offer or agreement is ongoing and subject to further negotiation as well as the planning outcome.

From: Tom Wimshurst
Sent: Monday, November 6, 2023 6:37 PM
To: [REDACTED] Rob Cummins [REDACTED]
Cc: Steven Pirks [REDACTED] ashaw [REDACTED]
Subject: Independence House residential units

Hi John/Rob

To follow up the conversation I had with John last week – see attached existing and proposed plans for the conversion of Independence House in central Richmond from an office into 21 residential flats. It's the former HQ of a large whisky company that was stripped out 4 years ago and is now the subject of a planning application to change its use to residential in the form of 21 GLA compliant units. There will be a number of affordable units within the completed scheme so we wanted to know whether as the local Housing Association if RHP would have an interest in either the affordable units or indeed in the entire block. We appreciate you don't typically look at conversions but bear in mind that this building has been stripped back to the shell and core so everything within the completed building would be renewed and all units will be fully GLA compliant.

Its located at 84 Lower Richmond Road, TW9 2HS.

Please do let us know if you have any questions.

Many thanks

Tom

Tom Wimshurst

Wimshurst Pelleriti

t [REDACTED]
m [REDACTED]
e [REDACTED]
w wimshurst-pelleriti.com

From: John Dwyer
To: Tom Wimshurst; Rob Cummins
Cc: Steven Pirks; [REDACTED]
Subject: RE: Independence House residential units
Date: 20 November 2023 13:59:29
Attachments: [image936508.png](#)

Hi Tom,

Apologies for the delay.

As per our discussion last week, I can confirm RHP are interested in the site (whole site, some of the affordable units or even looking at the possibility of land purchase).

Happy to have further discussions.
Kind regards,
John

John Dwyer New Business Project Manager

RHP, 8 Waldegrave Road
Teddington, TW11 8GT

[REDACTED]
[REDACTED]
w: www.rhp.org.uk
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To reduce paper waste when emails are printed we have placed our disclaimer information here: www.rhp.org.uk/emaildisclaimer

From: Tom Wimshurst [REDACTED]
Sent: Monday, November 13, 2023 1:26 PM
To: John Dwyer [REDACTED] Rob Cummins [REDACTED]
Cc: Steven Pirks [REDACTED] ashaw [REDACTED]
Subject: RE: Independence House residential units

This email has been sent from outside of RHP, please proceed with caution.

Hi John/Rob

Just to follow this up – have you been able to consider this? It would be useful to know whether you would have an interest in this building going forward. We assume these new units would be covered by the appropriate new build warranty – as well as GLA compliance.

Thanks

Tom

Tom Wimshurst

Wimshurst Pelleriti

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m 07717 411709
e tom@wp.uk.com
w wimshurst-pelleriti.com

TECHNICAL INFORMATION

PLAY AND CHILD OCCUPANCY ASSESSMENT

GLA Population Yield Calculator

The calculation on this page inputs the proposed unit mix and confirms that the projected child occupancy does not exceed 10. Therefore no child play space is provided on site.

GLA Population Yield Calculator

	1 bed	2 bed	3 bed	4 bed
Market and Intermediate Units	12	6	1	0
Social Units	0	0	2	0

Total Units: 21

Geographic Aggregation: London

PTAL: PTAL 5-6

Notes

Sample size of 27 sites
 Shaded cells require user input
 Select both geography and PTAL
 For developments in Outer London with PTAL 5-6 use [London/PTAL 5-6] or [Outer London/3-4] to calculate yield

Yield from Development (persons)

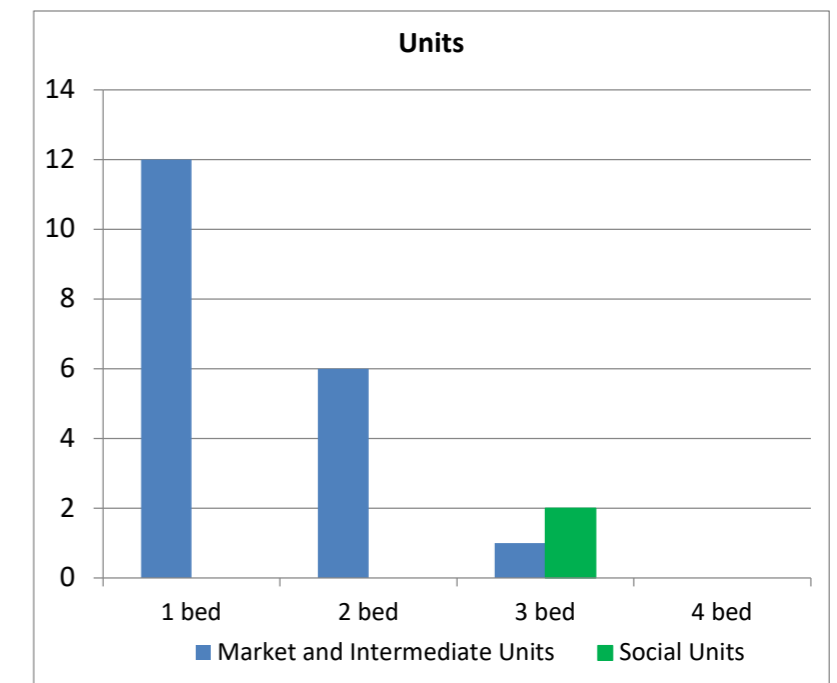
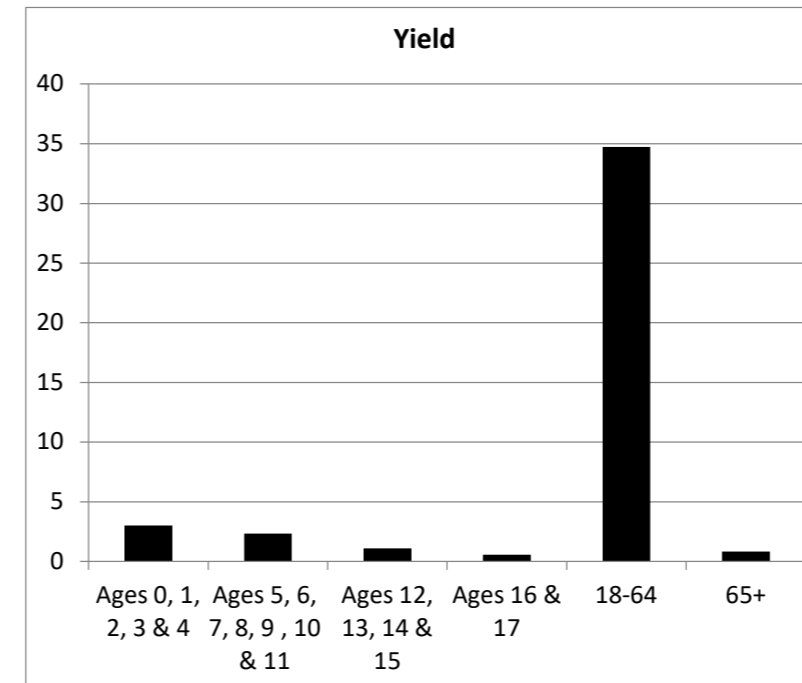
	Market & Intermediate	Social	Total
Ages 0, 1, 2, 3 & 4	1.5	1.5	3.0
Ages 5, 6, 7, 8, 9, 10 & 11	1.0	1.3	2.3
Ages 12, 13, 14 & 15	0.2	0.9	1.1
Ages 16 & 17	0.1	0.5	0.6
18-64	30.8	3.9	34.7
65+	0.7	0.1	0.8
Total Yield	34.3	8.2	42.5

Play Space Calculator

Total Children: 7.0

	Benchmark (m ²)	Total play space (m ²)
Play space requirement	10	69.8

Estimated yield from a development of 21 units
 Located in London with a PTAL of 5-6



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