

S+T PROJECT REF: 3926

PROJECT ADDRESS: 207-215 KINGS CROSS ROAD

LONDON WC1X 9DN

DOCUMENT: PLANNING DESIGN & ACCESS

STATEMENT

DATE: OCTOBER 2015

REVISION: PO

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EXISTING SITUATION

1.1 INTRODUCTION

This Design & Access Statement is outlining the refurbishment of 207-215 Kings Cross Road in support of a full planning application.

Site

The existing building consists of lower ground, ground floor, three upper floors and a set-back extension at fourth floor. It was built in the 1950s / 60s as an office building.

Site Location

207-215 Kings Cross Road is situated in the Kings Cross St Pancras Conservation Area. The building fronts the lively junction of Kings Cross Road and Pentonville Road to the North. It is flanked by 205 Kings Cross Road at the East and 257-259 Kings Cross Road at the West. Its Southern edge abuts to 6 St Chad's Place and Stanley House and overlooks their roofs from second floor onwards.

In our analysis we established the following positive and negative aspects of the existing building.

Pros

- Prominent street frontage
- Attractive opening formats at upper floors
- Building overall in a good condition
- Attractive existing staircase
- Attractive rear view at upper floors.

Cons

- Ground floor not level with pavement ramped access required
- Insufficient natural light at lower ground level.
- 'Cluttered' internal layouts
- Toilet provision
- Small sized rear windows at 2nd floor level
- Excess of columns at 3rd floor level to support set back floor
- No lift access at 4th floor level
- Façade looks dated

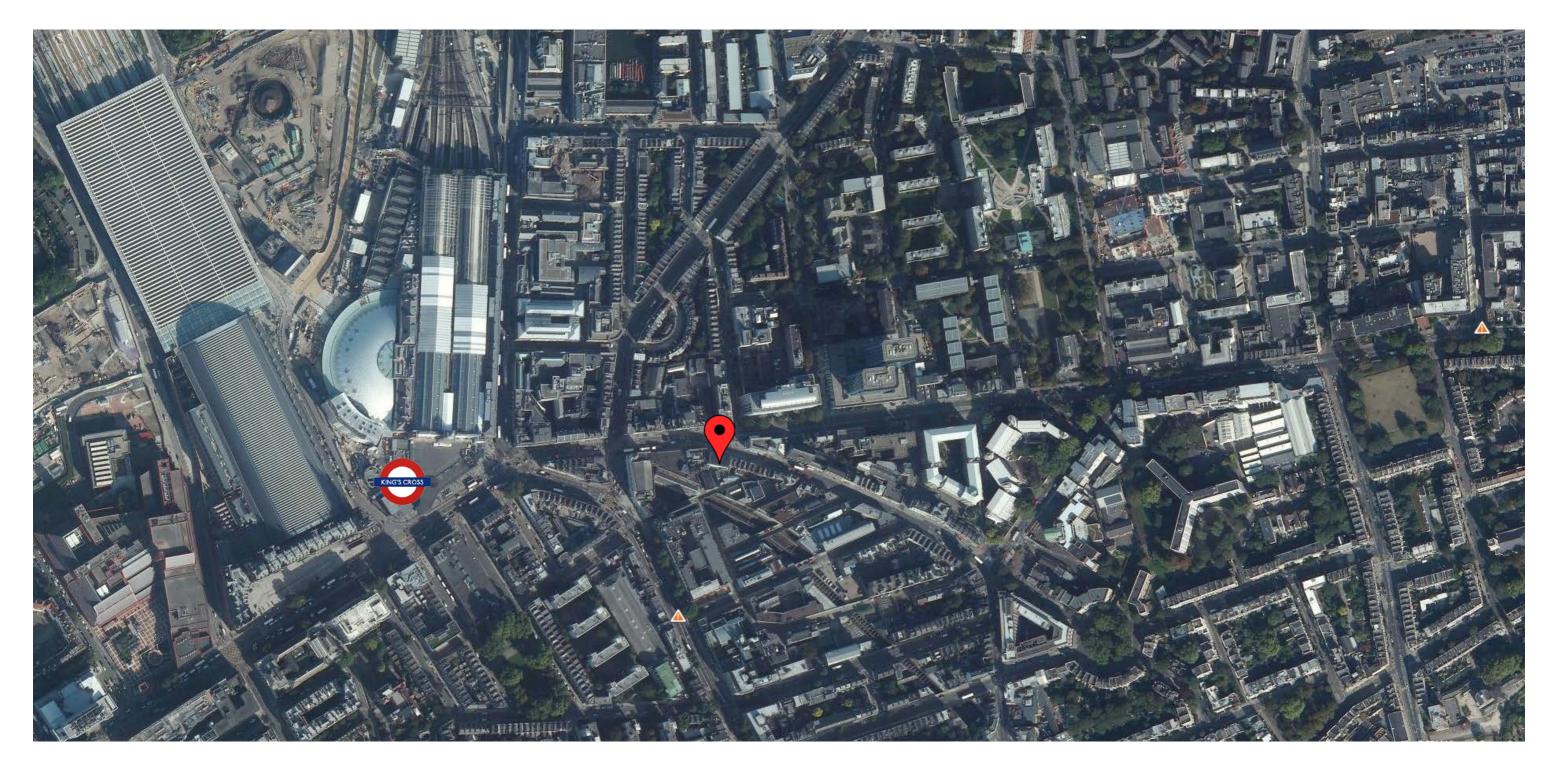
1.2 BUILDING HISTORY

This is a 1950s (or possibly early 1960s) building originally arranged on basement, ground and three upper storeys.

The site's planning history can be summarised as follows:

- 1998: Change of use of basement and ground floor from B1 (office) to A3 (food and drink) (PS9804850).
- 2000: Additional office floor (4th floor) and Extension to existing 3rd floor terrace (PS0004902).
- 2001: The installation of a new glazed entrance door to replace an existing roller shutter, and alterations to an existing entrance, together with the installation of a canopy over the new and existing entrances (PSX01041456).
- 2001: The installation of new aluminium window frames to replace existing, cladding and render
 for the fourth floor, together with amendments to planning permission (ref. No. PSX0004902/
 R2) which include, the location of plant within a louvred enclosure on the flat roof of the 2nd
 floor rear east and west extensions, the installation of a metal clad louvre enclosure at rear
 first floor level, the location of plant within a roof void within the roof of the building, and the
 installation of louvre doors and a glazed door at fourth floor level to the front of the building
 (PSX0104408).
- 2005: Change of use from offices (Class B1) to surgery (Class D1) at ground floor level, installation of portcullis roller shutters to front elevation, installation of air conditioning units to roof of existing single storey rear extension (2005/0745/P)
- 2006: Change of use from office use (Class B1) to Camden & Islington Community Mental Health Trust at 1st 4th floor levels (2006/4806/P).
- 2007: Variation of condition 2 of planning permission dated 22nd February 2007 (reg. no. 2007/4806/P) to allow use of premises to be used by the Barnet, Enfield and Haringey NHS Trust instead of being restricted to Camden and Islington Mental Health Trust (2007/1767/P).

1.2 SITE- LOCATION & SURROUNDING







VIEW FROM THE NORTH VIEW FROM THE SOUTH

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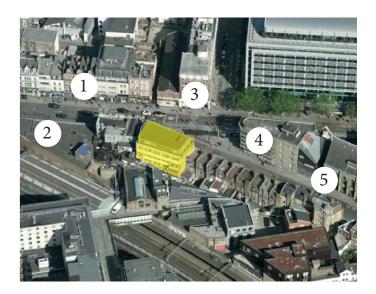




CONTEXT













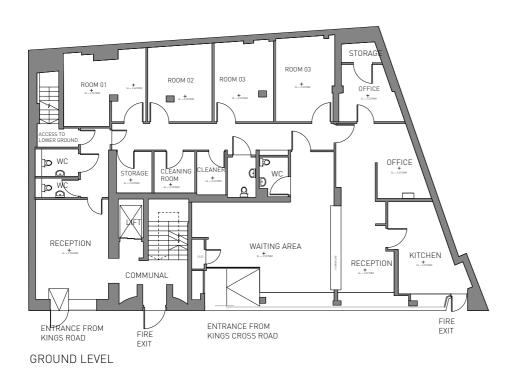
Stiff + Trevillion

EXISTING

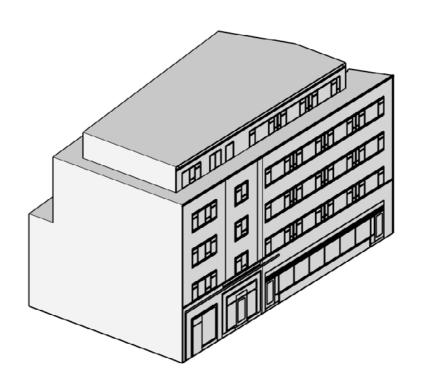
1.3 BUILDING - CURRENT USE AND LAYOUT

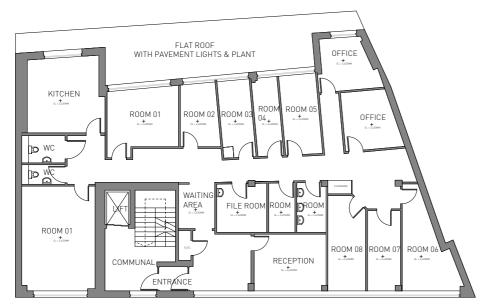


LOWER GROUND LEVEL

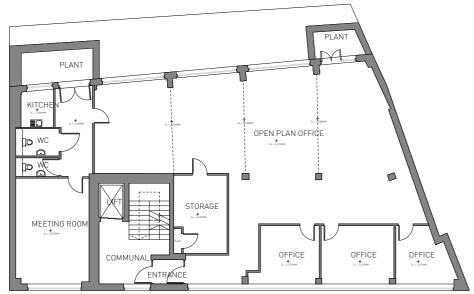


EXISTING AREA	GEA		GIA		NIA		GIA/GEA	NIA/GIA
	sq m	sq ft	sq m	sq ft	sq m	sq ft		
LOWER GROUND	321.0	3,455	282.0	3,035	221.0	2,379	87.85%	78.37%
GROUND FLOOR	325.0	3,498	296.0	3,186	200.0	2,153	91.08%	67.57%
FIRST FLOOR	288.0	3,100	259.0	2,788	217.0	2,336	89.93%	83.78%
SECOND FLOOR	269.0	2,895	244.0	2,626	199.0	2,142	90.71%	81.56%
THIRD FLOOR	269.0	2,895	245.0	2,637	198.0	2,131	91.08%	80.82%
FOURTH FLOOR	187.0	2,013	168.0	1,808	127.0	1,367	89.84%	75.60%
TOTAL AREA	1,659.0	17,857	1,494.0	16,081	1,162.0	12,508	90.05%	77.78%

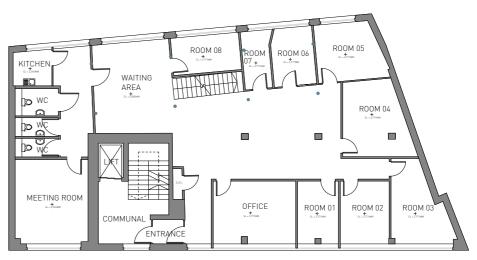




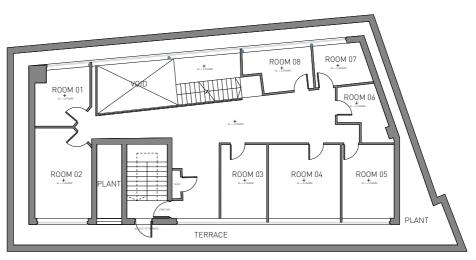
FIRST LEVEL



SECOND LEVEL



THIRD LEVEL



FOURTH LEVEL

PROPOSAL

2.0 PROPOSAL

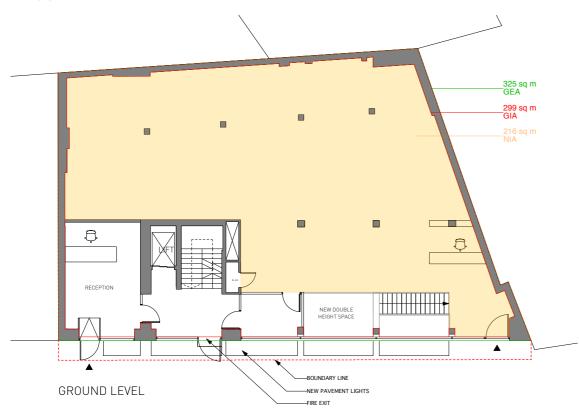
2.1 PROPOSED USE & DESIGN

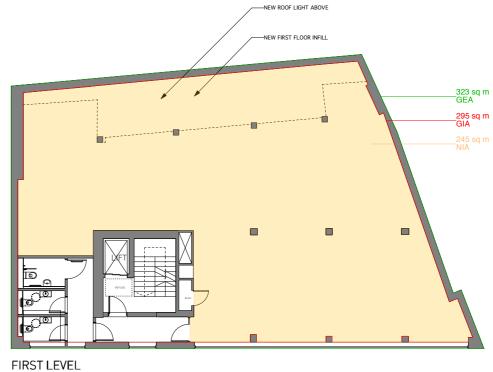
The proposed refurbishment will enhance and revive the existing building and transform it into a attractive office space for future tenants. It comprises:

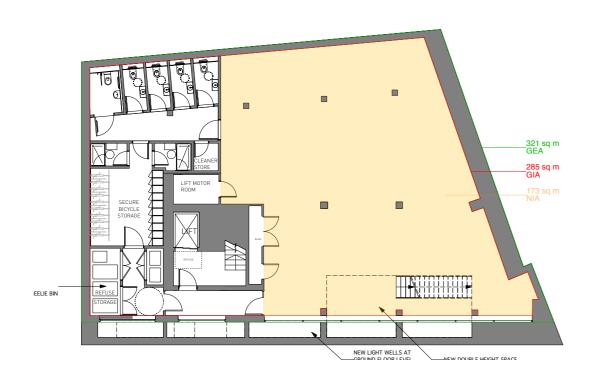
- Modify ground floor façade and entrance
- Replace existing windows
- Reclad 4th floor
- Paint Brickwork
- Replace existing pavement lights
- Create double height space at lower ground floor and relocate second staircase
- Fill in / extend 1st floor
- Relocate bathrooms
- Create new roof lights at 2nd floor on rear facade
- Remove second stair and columns at 3rd floor
- Continue lift to 4th floor
- Relocate bathrooms
- Introduce secure cycle parking and showers at lower ground

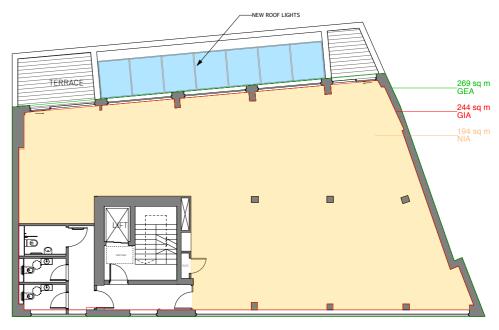
PROPOSAL

2.2 PROPOSED LAYOUT



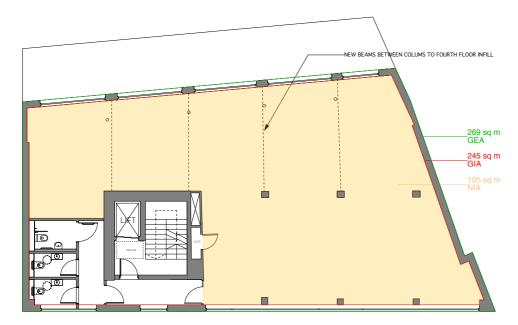




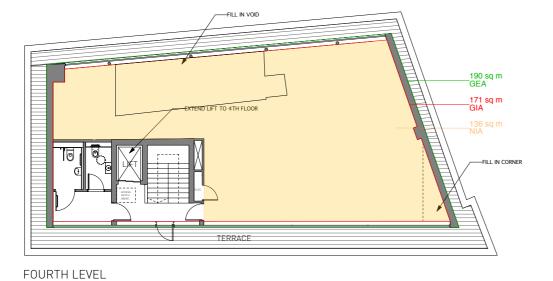


SECOND LEVEL

Stiff + Trevillion207-215 KING'S CROSS ROAD PROPOSAL

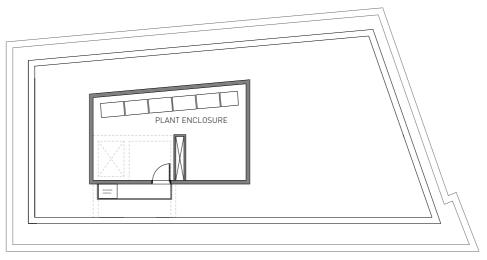


THIRD LEVEL



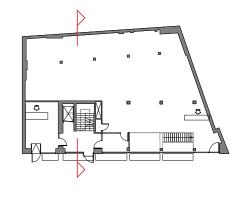
PROPOSED AREA GEA sq m GIA/GEA NIA/GIA LOWER GROUND 321.0 3,455 285.0 3,068 173.0 1,862 88.79% 60.70% GROUND FLOOR 325.0 3,498 299.0 216.0 92.00% 72.24% 323.0 3,477 295.0 245.0 83.05% FIRST FLOOR 3,175 2,637 91.33% 269.0 244.0 194.0 90.71% 79.51% SECOND FLOOR 2,895 2,626 THIRD FLOOR 269.0 245.0 2,637 195.0 79.59% 2,895 2,099 1.08% FOURTH FLOOR 80.70% TOTAL AREA 1,697.0 18,266

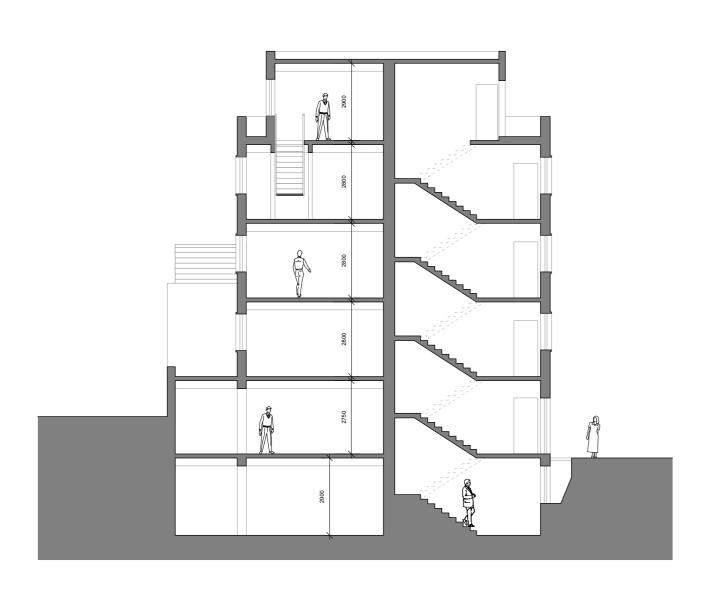
TOTAL AREA INCREASE	sq m	sq ft
GEA	38.0	409
GIA	45.0	484
NIA	49.0	527

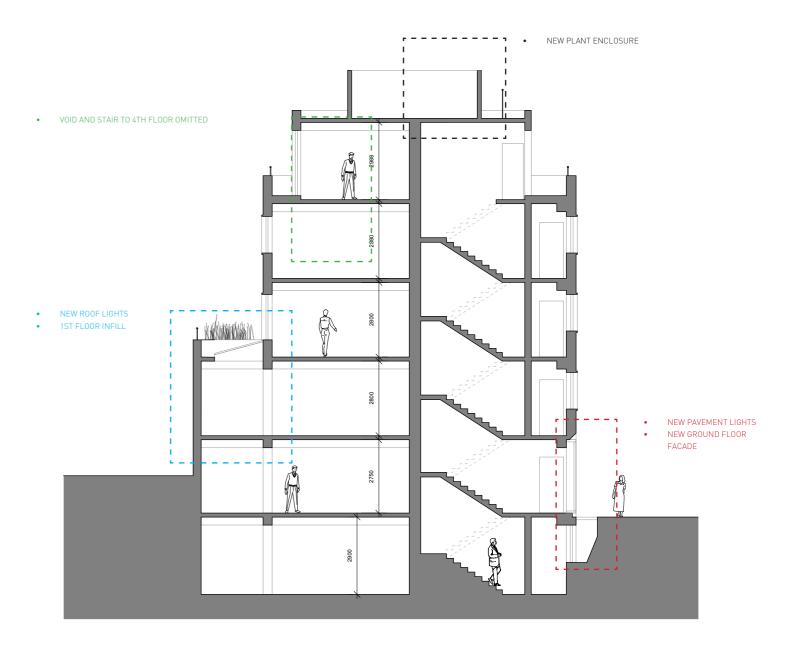


ROOF LEVEL

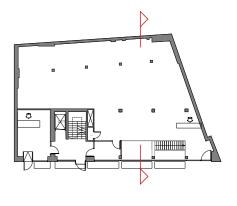
2.3 SECTIONS

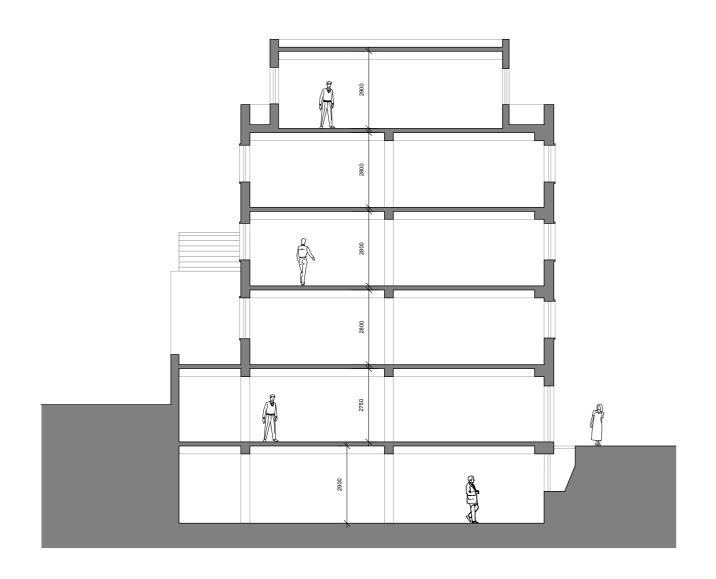


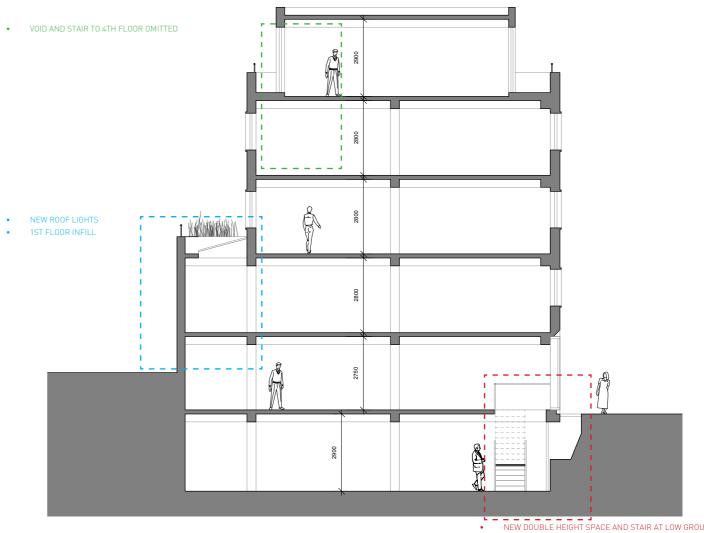




EXISTING SECTION PROPOSED SECTION



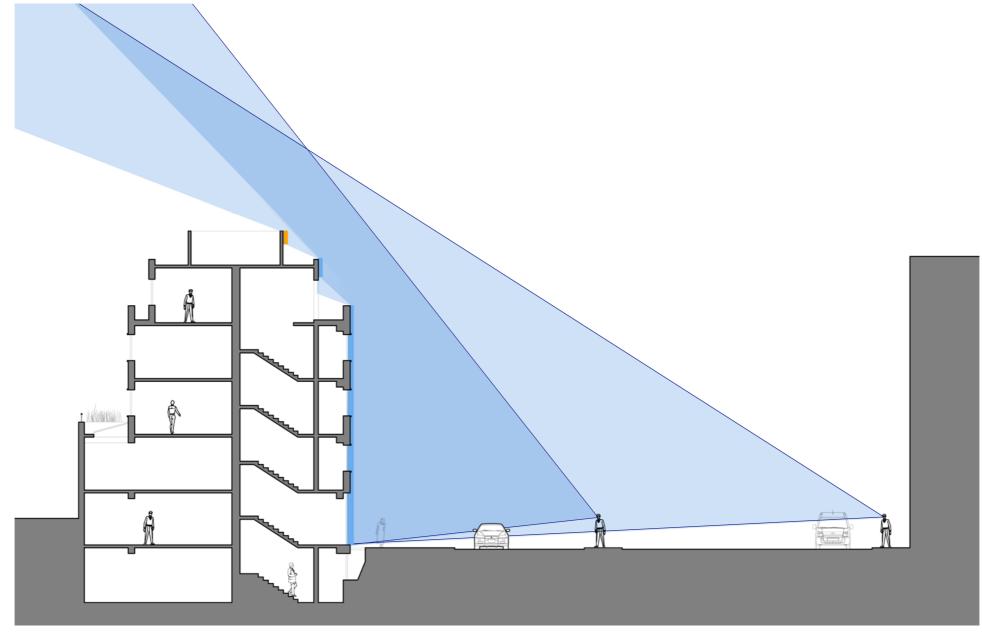


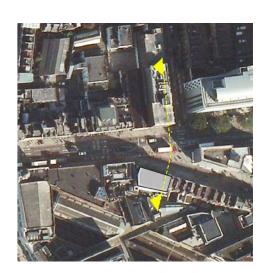


NEW DOUBLE HEIGHT SPACE AND STAIR AT LOW GROUND FLOOR
 TRANSLUCENT AND BACKLIT WALL AT LOWER GROUND IN
FRONT OF LIGHT WELLS

EXISTING SECTION PROPOSED SECTION

PROPOSAL Planning Design & Access statement

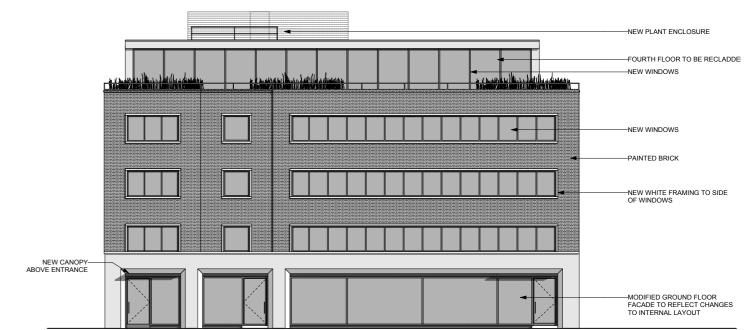




Visual impact of new plant enclosure

2.5 ELEVATIONS





EXISTING FRONT ELEVATION

PROPOSED FRONT ELEVATION

PROPOSAL





EXISTING REAR ELEVATION PROPOSED REAR ELEVATION

PROPOSAL Planning Design & Access statement

2.6 SREET VIEWS





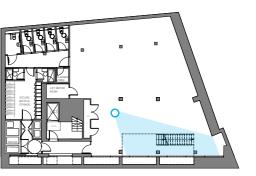
EXISTING BUILDING PROPOSED BUILDING

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PROPOSAL

2.6 PROPOSED INTERNAL STAIR





Lower ground floor



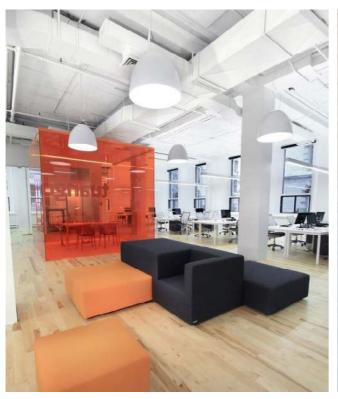


Stiff + Trevillion

2.7 REFERENCE IMAGES











PLANNING POLICY

3.0 PLANNING POLICY

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

The Development Plan for 207-215 King's Cross Road comprises the London Plan (March 2015), together with the Camden Core Strategy and Camden Development Policies.

Other documents that are material considerations include the National Planning Policy Framework (March 2012), Planning Practice Guidance and Supplementary Planning Documents prepared by both the Greater London Authority and the London Borough of Camden.

This section provides a brief review of the relevant national, regional and local planning policies and outlines how the proposals accord with them.

3.1 NATIONAL PLANNING POLICY FRAMEWORK (MARCH 2012)

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied.

At the heart of the NPPF is a 'presumption in favour of sustainable development', which for decision-taking means that local authorities are encouraged to approve development proposals that accord with the development plan without delay.

One of the key objectives of the NPPF is to support sustainable economic growth, requiring local planning authorities to plan pro-actively for the development needs of business and ensure that planning policy expectations to not create barriers to investment. The NPPF also attaches great importance to the design of the built environment, noting that good design is a key aspect of sustainable development that should contribute positively to making places better for people.

The proposed refurbishment and extension of 207-215 King's Cross Road accords with these NPPF objectives by providing modern, fit-for-purpose office space to support business investment and significantly enhancing the visual appearance of the existing building through façade improvements.

3.2 LONDON PLAN (MARCH 2015)

The Mayor's London Plan was adopted in March 2015 and provides the consolidated spatial strategy for London. The London Plan sets out a number of strategic objectives which are relevant to the proposals for 207-215 King's Cross Road.

3.2.1 London's Economy

Policy 4.2 of the London Plan provides general support for the provision of office space to "improve London's competitiveness......, including enhancing its varied attractions for businesses of different types and sizes including small and medium sized enterprises", and gives specific encouragement to the "renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility".

The site lies within the Central Activities Zone and adjacent to the King's Cross-St Pancras Opportunity Area defined by the London Plan, where economic investment and the provision of new and improved office space is encouraged. The expansion and enhancement of the office space at 207-215 King's Cross Road is therefore fully supported by the London Plan.

3.2.2 Architecture

Policy 7.6 of the London Plan encourages architecture that makes a positive contribution to the streetscape and incorporates the highest quality materials and design appropriate to its context. The simple, contemporary and contextual approach taken to the proposed improvements to 207-215 King's Cross Road are in line with these objectives.

3.3 CAMDEN DEVELOPMENT POLICIES

3.3.1 CHANGE OF USE FROM HEALTH FACILITIES TO OFFICE

Policy CS10 of the Core Strategy establishes general support for the provision and retention of community facilities and services and Policy CS16 seeks to protect existing health facilities and support the provision of new or improved facilities "in line with NHS London's plans to consolidate and modernise its facilities."

Prior to 2005, 207-215 King's Cross Road was in use as an office (B1). Since that time, planning permission has been granted for change of use as follows:

- Ground floor: Change of use to D1 (healthcare) for use as a surgery by Camden Primary Care NHS Trust.
- 1st to 4th floors: Change of use to D1 (healthcare) for the provision of mental health services by Camden and Islington Community Mental Health Trust. Condition 2 of this consent advised that the permission is personal to Camden and Islington Mental Health Trust and/or its statutory successors for the period of their occupation only (his condition was subsequently varied to extend the personal permission to enable use of the premises by the Barnet, Enfield and Haringey NHS Trust). Once the NHS Trust(s) and/or its statutory successors vacate the premises the lawful use will revert to B1 (office).

The NHS Trust has recently decided to relocate all of it's operations from 207-215 King's Cross Road to their existing complex nearby at St Pancras Way as a means of reducing costs and consolidating services. Accordingly, the Trust has served notice to terminate its lease on the building and will formally vacate on 22nd November 2015.

The lawful use of the 1st to 4th floors will revert to office (B1) use at this time in accordance with the personal permissions, however the lawful use of the ground floor will remain as healthcare (D1) as this was not subject to the personal consents.

As a result of NHS Trust's decision to vacate the property, the owners have decided to renovate the building in B1 use to make it attractive to a broader range of tenants and ensure that it remains in productive use.

Change of use of the ground floor from healthcare (D1) to office (B1) is therefore sought as part of this planning application. Given that it results directly from the NHS Trust's decision to vacate the property and consolidate its services nearby, the proposed change of use of the ground floor back to office (B1) is not considered to contravene the Core Strategy policies with respect to provision and retention of health facilities.

3.3.2 CAMDEN'S ECONOMY

207-215 King's Cross Road lies within a "Highly Accessible Area" and adjacent to the King's Cross "Growth Area" defined in the Core Strategy. New development which supports the economy, enhances environmental quality and safeguards heritage value is generally supported in this location.

Policy CS8 provides encouragement for new or enhanced office development, including the provision of facilities suitable for small and medium sized enterprises. The proposed creation of new and enhanced flexible office space at 207-215 King's Cross Road clearly accords with these strategic objectives.

3.4 DESIGN AND HERITAGE

Policy CS14 promotes the creation of high quality places and the conservation of Camden's heritage, "requiring development of the highest standard of design that respects local context and character" and "preserving and enhancing Camden's rich and diverse heritage assets and their settings, including conservation areas...".

The proposals for 207-215 King's Cross Road will further these objectives by sensitively upgrading and enhancing a prominent building façade within the King's Cross Conservation Area.

Policy DP24 of the Camden Development Policies seeks to achieve the highest quality of design in all new developments, including alterations and extensions to existing buildings. The proposals for 207-215 King's Cross Road have been carefully considered to address the requirements of Policy DP24 through:

- Improvements to the principal façade fronting King's Cross Road which will enhance the character and quality of the street.
- Use of high quality, durable materials.
- Introduction of a modest extension to the rear of the building at first floor level which respects the proportions of the existing building.
- Improvements to the legibility and accessibility of the building for occupiers and visitors.

Policy DP25 seeks to ensure that development within Conservation Areas takes account of Conservation Area statements and preserves and enhances the character and appearance of such areas. The application site lies within the Gray's Inn Road sub-area of the King's Cross Conservation Area.

The King's Cross Conservation Area Statement notes that the character of this part of King's Cross Road is defined by its mix of residential terraced buildings with shops at ground floor level, interspersed with larger office and retail buildings and public houses.

It describes 207-215 King's Cross Road as "a large, four-storey office building of mid-20th Century date. The building is constructed of red brick with a pale stone ground floor facade, horizontal bands of windows with rendered reveals and a recessed fifth floor roof extension".

The proposals for 207-215 King's Cross Road have been prepared in accordance with the guidelines for new development outlined in the Conservation Area Statement so that they fully respect the built form and historic context of the area, local views, existing building lines and roof lines, and elevational design and materials.

In addition, the rear extension has been restricted to a single-storey and made as unobtrusive as possible so that it does not in any way adversely affect the character of the building or the Conservation Area as a whole.



3.5 SUSTAINABLE DESIGN AND CONSTRUCTION

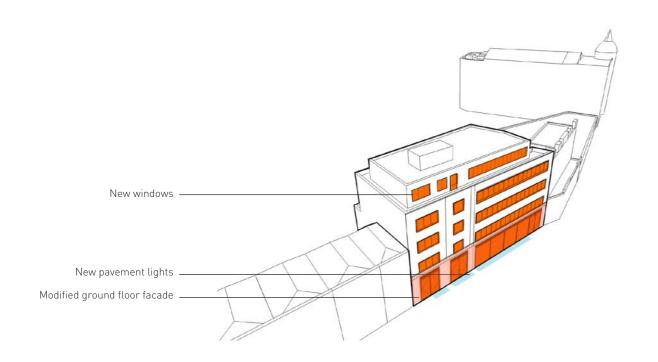
Policy 5.3 of the London Plan states that the highest standards of sustainable design and construction should be achieved in London to improve the environmental performance of new development.

The proposals for 207-215 King's Cross Road are not of sufficient scale to trigger the London Plan's sustainable design and construction standards for major development, however the design of the refurbishment and extension has been carefully considered to reduce the energy, waste and water consumption of the building wherever possible.

Policy DP22 seeks to minimise Camden's contribution to climate change by promoting higher environmental standards in design and construction. Although the proposals for 207-215 King's Cross Road are not of sufficient scale to require achievement of a particular BREEAM standard, the design of the refurbishment and extension has been carefully considered to address environmental objectives through a variety of measures, including low energy light fittings, zoned heating systems and use of green, non-toxic materials.

The proposed development benefits from its excellent local public transport opportunities, which will be highlighted to all building users.

Nearby London underground and bus services provide easily accessible routes from the application site into all areas of London and other destinations. The development will also incorporate cycle storage facilities to help encourage alternative forms of transport and limit dependency on private car use.



New roof lights New roof lights Existing plant enclosure to be removed Rear 1st floor infill

3.6 MASSING & APPEARANCE

The first floor is infilled at the rear of the building.

The internal reconfiguration of upper floors from 2nd to 4th does not affect the massing of the existing building.

The existing windows are replaced.

The existing brickwork is painted.

The ground floor façade is modified.

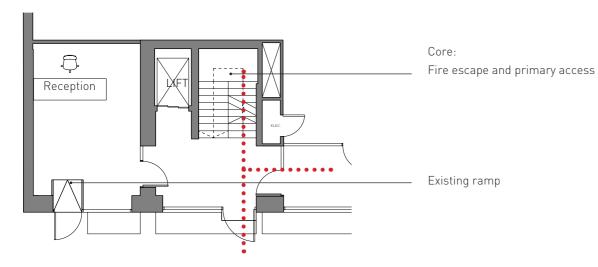
3.7 EXTERNAL WORKS

New pavement lights will be installed along King's cross Road elevation.

3.8 AMENITY

In line with the requirements of Policy DP26, the proposals for 207-215 King's Cross Road have been developed to protect the quality of life of occupiers and neighbours with respect to visual privacy and overlooking; overshadowing and outlook; odour, fumes and dust; waste storage, recycling and disposal; and sunlight / daylight levels.

ACCESS



Drawing 1: Ground floor main entrance

4.0 ACCESS

4.1 INCLUSIVE DESIGN

All appropriate standards of inclusive design have been considered and have been included in the proposal from an early stage and will continue as an essential part of the design. The design has developed with regard to mandatory access standards.

The intentions are:

- To maximise access to all parts of the development for visitors regardless of disability.
- To ensure that wherever possible appropriate standards for accessibility can be met at the outset as part of mainstream inclusive design.
- To meet requirements of The Building Regulations Approved Document M Access to and Use of Buildings, 2013.
- To meet the aims of the Equality Act 2013 (since 1 October 2013).
- To follow design guidance given in relevant British Standards, and other currently published good practice detailing the needs of disabled people.
- To meet local authority access policies where relevant.

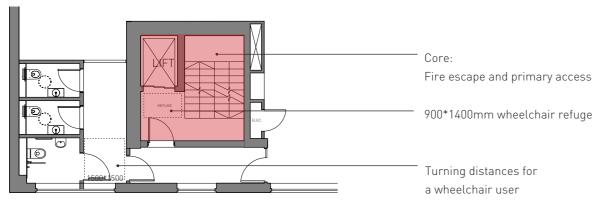
4.2 ALTERNATIVE ACCESS STRATEGY

The existing ground floor slab lays about 200 mm above pavement level.

The existing ramp has a gradient of 1:6. This makes it difficult for disabled persons to access the building.

However the existing structure and space limitations do not allow for the provision of a compliant ramp.

As an alternative access strategy to the existing ramp we propose the provision of protable temporary ramps which could be provided at both entrances by reception staff. These would allow for an easier access.



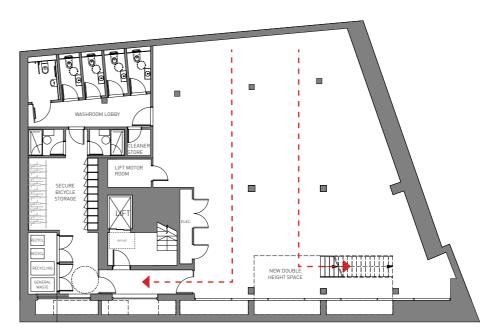
Drawing 1: Typical upper floor core configuration

Drawing 2: Ground floor- Fire escape routes

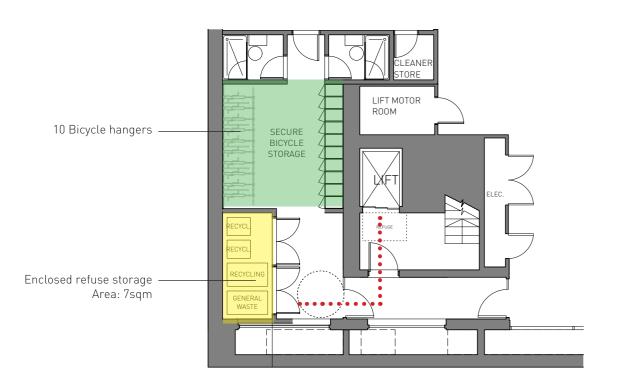
4.3 FIRE ESCAPE

This is a single stair building. Access to the office floor plate is via the lift and staircase as highlighted on drawing 2. In the event of fire, escape will be via the staircase. Lobbied protection to the stair is provided at all levels (except the top). Alternative escape from the building at top floor level via a neighbour is possible.

The floor between the ground and first floor will be a 60 minute compartment. Travel distances are within 18m for single direction and 45m where there is more than one direction of escape. As this is likely to increases beyond this with furniture in future an L2 level fire alarm will be provided.



Drawing 3: Lower ground floor- Fire escape routes



Drawing 3: Lower Ground Floor refuse and cycle storage configuration

4.4 BIKE STORAGE

A secure bicycle store will be provided at lower ground floor with a minimum of 10 bicycle parking spaces and lockers.

4.5 WASTE DISPOSAL

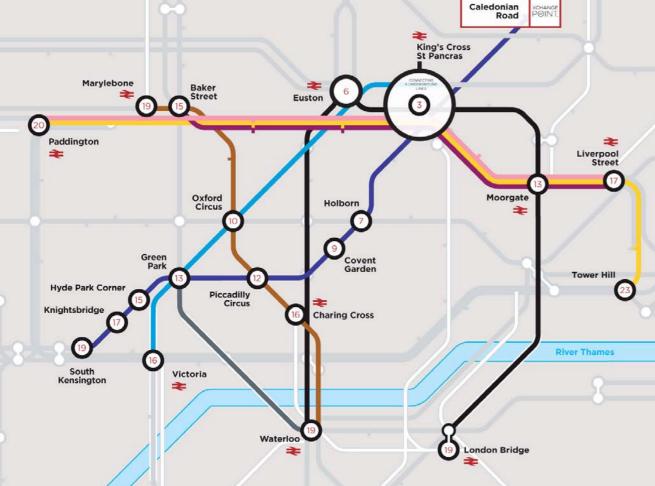
Waste bins and recycling bins are provided in enough quantity at every floor.

The communal refuse store will be located at lower ground floor and access will be via the lift.

Bins will be weekly moved along King's cross road elevation for servicing.

Refuse storage is provided to comply with the current Camden coucil and UK requirements:





4.6 PUBLIC TRANSPORTATION

Being located in central London and within zone 1 of the transportation network. King's cross road has excellent transport connections within its immediate vicinity.

Underground:

King's cross Underground Station (Northern, Circle, Hammersmith & City, Victoria, Picadilly, Metropolitan line) is within a 300m walk.

Train:

King's Cross and St Pancras International stations (national and international rail services) are within a 300m walk.

Bus

King's Cross Caledenonian Road Bus stop X and King's Cross Pentonville Stop L (Buses 30, 73, 205, 214, 476, N73, N205, 17, 45, 46, 63, N63) are within a 50m walk.

5.0 CONCLUSION

- The proposal involves the internal reconfiguration of the NHS surgery and mental health clinic into an office building.
- The first floor is extended at the rear of the building.
- The existing windows are replaced, the brickwork is painted and the ground floor façade is modified.
- The redevelopment does not effect the daylight and sunlight enjoyed by the adjoining and neighbouring properties.

Based on this review of relevant national, regional and local planning policies, it is concluded that the proposals for 207-215 King's Cross Road are generally in accordance with the development plan for the area, will have no significant adverse impacts on the locality and indeed will make a positive contribution through the provision of high quality office space and enhancements to the external appearance of the building and the wider Conservation Area. Accordingly, the application should be granted planning permission.

APPENDIX

Peter Deer and Associates Sustainability

Environmental Consultancy

Peter Deer and Associates Sustainability Environmental Consultancy

207-215 Kings Cross Road

Energy & Sustainability

October 2015

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Executive Summary

London Borough of Camden's Energy and Sustainability Policies

CS13. Tackling climate change through promoting higher environmental standards,

DP22 Sustainable design and construction,

DP23 Water.

- Camden Core Strategy CS13
- Camden Development Policy DP22
- Camden Planning Guidance 3 Sustainability

Energy Reduction

2013 Building regulation	Emissions	Improvement	EPC
Reference Building	62 KgCO2/m ²		D rating
Typical Building	32 KgCO2/m ²	48% from Reference	C rating
Proposed Building	21kgCO2/m ²	66% from reference	B rating

Reference Building

The calculation process compares the carbon emissions of the building with those of a reference building. The reference building is an equivalent building (i.e. a building of the same size, shape and use as the actual building) constructed to a reference building designed to a specified standard.

Typical Building

This based on statistical averages for building with energy systems and usage patterns.

Proposed Actual Building

This the predicted energy rating of the this building built with system outlined below.

The following measures are proposed for the refurbishment of 207-217 Kings Cross Road.

Passive Design

As part of the building's refurbishment the passive thermal improvement include new energy efficient double glazed windows with solar reducing glass reducing the overheating risk in summer. The design team shall explore additional opportunities to reduce fabric heat losses.

Energy Efficient Heating and Cooling

Heat Pumps extract low grade heat from the air or ground and raise the heat to a higher temperature for use in buildings. Energy efficient Variable Refrigerant Flow (VRF) air source heat pumps are more efficient than standard heat pumps as these units scavenge heat from areas that require cooling to areas requiring heating. For instance heat is often recovered from computer servers and reused in the office space.

Energy Monitoring

The building services plant is designed so that each floor has separate utility meters, heating and cooling plant. The Landlord will separately calculate each tenants energy usage, and with the advantage that the tenants can also actively monitor and reduce their own energy consumption.

Heat Recovery Mechanical Ventilation (MVHR)

The air quality in King's Cross area is poor due to the vehicle congestion in this part of London. Natural ventilation is not recommended, due to high levels of noise and pollution (PM10 and NOx).

To provide a clean air office environment, MVHR is the proposed solution The MVHR unit will be located on each floor taking the cleaner air from high level or the rear facade, which shall be filtered to remove pollutants and heat recovered from the extract air. This will ensure the working space complies with the requirements of World Health Organisation indoor air quality levels.

Sustainable transport

Sustainable transport is to be encouraged with the inclusion of secure cycle storage and heated changing rooms containing showering facilities and secure lockers.

The King's Cross location has extremely good public transport links, but limited local car parking. The building user will be encouraged to use public transport as the travel method and join local car club for when a car journey is required (Zip Car / Drive Now).

Energy Efficient Lighting

The redesign of the windows will help to improve the natural daylight into the office spaces. New Low energy high efficiency LED lamps and luminaires with automatic lighting control systems with a combination of daylight sensor and presence/absence detectors will be installed. This will further reduce energy demands for the building.

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Water Reduction

To reduce water consumption and the risk of wasting water from leaking fitting, the washroom will installed with low flow rate fittings and water shut off device linked to the lighting control device. This shall ensure that the water is shut off when the washroom is not occupied. Water leaks often go unreported for some time in commercial buildings and often only report after damage has occurs. Water

shut off devices reduce quantity of wasted water and risk of water damage to the building.

Major leak detection system will be installed to the incoming water supply. These systems are design to detect unusual water use and leaks from underground pipe and alert the building maintenance team

to potential problems.

Waste Reduction

To reduce construction waste the design team and contractor will apply WRAP Quick Wins assessment method to this project. There are five key principles that design team and contractor will follow to reduce construction waste:

Design for Reuse and Recovery;

Design for Off Site Construction;

· Design for Materials Optimization;

· Design for Waste Efficient Procurement; and

· Design for Deconstruction and Flexibility.

The main contractor will be required to provide a site waste management plan before work starts. Only site waste collection companies with a record of recycling more than 60% of the collected waste will be consider to provide the site waste removal service.

Space for four separate bins has been provided on the lower ground floor plan. The occupants will be required to recycle the office waste, into separated bins at source.

Surface water and flooding

It is extremely difficult to retro fit rainwater attenuation into existing buildings. The design team will consider the inclusion of brown / living roof which can make contribution toward reducing surface water run-off.

207-215 Kings Cross Road 4005 151015ah energy section for D&A.docx

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