

From: Jonathan Greenberg

Sent: 18 June 2026 14:17

To: Kwaku Bossman-Gyamera

Subject: HGY/2026/1292 – 22 Palace Road – Variation of Energy Condition - Carbon comments

Dear Kwaku,

I hope you're well.

I have reviewed the attached comments together with my client and our energy consultant - please see below our response.

In light of our response below, it would be useful to have a discussion via a Teams call so that we can provide some additional detail to you and the Climate Change Officer on the feasibility issues associated with what is being requested. If helpful, we can offer the following dates: 24th, 26th, 29th or 30th June. Please let me know whether any of these dates would be convenient.

Kind regards

Jonathan

Energy

Applicant should explore ways to align the current proposed building fabric thermal performance with the consented scheme.

As stated within the covering letter for the S73 application, following detailed design and cost review by the applicant, in light of current financial market conditions, it has become clear that the energy strategy approved as part of the original permission is not deliverable and therefore requires amendment.

The approved strategy relied on electric heating, individual heat pumps for domestic hot water, MVHR and photovoltaic panels. In order for that strategy to meet the required carbon reductions, the building fabric specification was required to achieve very low space-heating demand, comparable to Passivhaus levels.

The scheme involves the refurbishment and extension of an existing building, rather than a wholly new-build development. Therefore, there are practical constraints in upgrading the existing floor/building fabric to fully align with the previously consented specification. Achieving the previously assumed levels of insulation, airtightness and thermal performance would require significant alterations to the existing structure and build-ups, which would affect the feasibility and deliverability of the development.

Whilst the revised scheme delivers a lower Be Lean reduction than the previously approved strategy, it continues to exceed the London Plan requirement for residential development of 10% below Part L achieving 14.2% for refurb areas and 12.9% for new build.

It is strongly encouraged to replace the gas boiler strategy with a heat pump strategy instead to ensure the proposed dwelling is future-proofed and will not have any on-site fossil fuel combustion.

The applicant has considered this further. However, extending the heat pump strategy to the refurbished units would have practical and cost implications, particularly given that the majority of the scheme relates to the conversion and refurbishment of an existing building. This would require further alterations to the existing fabric, services and internal build-ups, which would affect the feasibility and deliverability of the development.

Whilst the revised scheme delivers a lower Be Green reduction than the previously approved strategy, it continues to exceed the 20% renewable energy ("Be Green") contribution.

Overheating

Applicant is strongly encouraged to explore to incorporate external shading to mitigation OH risk passively.

Applicant should revise their OH strategy to address the potential acoustic issue.

The following condition is attached to application HGY/2025/0363:

Prior to above ground construction, a statement shall be submitted to and approved by the Local Planning Authority to demonstrate how the overheating risk has been minimised and mitigated on site in line with the London Plan Cooling Hierarchy. Details and specification of the mitigation measures shall be provided in support of this statement.

In light of the above, we consider that overheating is already appropriately secured by condition and will be addressed prior to above-ground construction. The condition requires the applicant to demonstrate how overheating risk has been minimised and mitigated in line with the London Plan Cooling Hierarchy, with the detailed mitigation measures to be reviewed and approved by the Council at that stage. On this basis, we consider that the matter can be appropriately dealt with through the discharge of the existing condition.

Jonathan Greenberg MRTPI

Founder, JG Town Planning

www.jgtownplanning.co.uk

Wohl Enterprise Hub, Redbourne Avenue, London, N3 2BS