

		Our ref: HGY/2026/0899 Contact: Gareth Prosser Date: 30/06/2026
Town and Country Act 1990 (As amended)		
Location:	Nice Place, Compton Avenue, Hornsey, London, N6 4LH	
Proposal:	Demolition of existing dwelling and erection of a replacement dwelling with rooms in the roof and basement (renewal of extant scheme - HGY/2022/4048).	

Carbon Management 30/06/2026

In preparing this consultation response, we have reviewed:

- Energy & Sustainability Statement prepared by The PES (dated March 2026)
- Relevant supporting documents.

1. Summary

Carbon Management cannot support the principle of demolition and rebuild, as the development does not demonstrate how it meets London Plan Policy SI7 by integrating circular economy principles.

The applicant could address this by providing the following:

- A response to the circular economy policy
- Detailed justification on demolition of the existing building

The development achieves a reduction of 64.26% in regulated carbon dioxide emissions on site against Building Regulations Part L 2021, which is supported in principle. However, further clarifications must be provided about the Energy Strategy and overall sustainable design approach.

2. Principle of development: Circular Economy

Policy SI7 requires applications to demonstrate how it promotes a circular economy within the design and aims to be net zero waste. Haringey Policy SP6 requires developments to minimise waste creation and maximise reuse and recycling.

The application is for a replacement dwelling. The submission provides limited justification for demolition, primarily based on redevelopment aspirations rather than demonstrating that refurbishment and upgrade of the existing building has been fully explored. This is insufficient to offset the embodied carbon impacts of demolition and rebuild.

The sustainability section does not demonstrate how these have been embedded within the design, including reuse of materials, adaptability, disassembly, or longevity of the building components.

Given the scale and energy demand of the proposed dwelling, the development should aim to be an exemplar of sustainable design, including reduction of both regulated and unregulated energy use.

Action:

- Has a Pre-Demolition Audit taken place to inform the quality of the existing property, materials and fittings that may be worth retaining?
- Please provide a detailed justification for the demolition of existing house;
- Set out how the waste hierarchy (reduce, reuse, recycle) has been applied and how circular economy principles (adaptability, disassembly, reuse, longevity) are embedded within the scheme.

3. Energy – Overall

Policy SP4 of the Local Plan Strategic Policies, requires all new development to be zero carbon (i.e. a 100% improvement beyond Part L (2021)). The London Plan (2021) further confirms this in Policy SI2.

The development achieves a reduction of 64.26% in regulated carbon dioxide emissions on site against Building Regulations Part L 2021, which is supported in principle.

This is achieved through significant fabric improvements, air source heat pumps (ASHPs), and a solar photovoltaic (PV) array

<i>Residential</i>			
	Total regulated emissions (Tonnes CO ₂ / year)	CO ₂ savings (Tonnes CO ₂ / year)	Percentage savings (%)
Part L 2021 baseline	17		
Be Lean	12.3	4.8	28 %
Be Clean	12.3	0.0	0 %
Be Green	6.1	6.2	36%
Cumulative savings		11	64%
Carbon shortfall to offset (tCO ₂)	6.1		
Carbon offset contribution	6.1 x 95 x 30 = £17,385		

Energy Use Intensity / Space Heating Demand

Applications are required to report on the total Energy Use Intensity and Space Heating Demand, in line with the GLA Energy Assessment Guidance (June 2022). The Energy Strategy should follow the reporting template set out in Table 5 of the guidance, including what methodology has been used. EUI is a measure of the total energy consumed annually, but should exclude on-site renewable energy generation and energy use from electric vehicle charging.

	Proposed Development	GLA Benchmark
Building type	Residential	Residential
EUI	34.87 kWh/m ² /year	Meets the GLA benchmark of 35kWh/m ² /year (TBC)
SHD	30.95 kWh/m ² /year	Does not meet GLA benchmark of 15 kWh/m ² /year (TBC)
Methodology used	SAP 10	

Actions:

- Confirm methodology used to derive EUI/SHD;
- Confirm whether the **swimming pool is included** in EUI and SAP calculations;
- Provide EUI for:
 - building excluding pool;
 - building including pool;
- Provide detailed energy strategy for the swimming pool (temperature, hours of operation, heating system, mitigation measures).

Energy – Lean

The proposal indicates a 28% Be Lean improvement, which exceeds the policy minimum of 10%. However:

- Limited detail is provided to verify fabric-first performance;
- The FEES improvement is only ~3%, which may indicate underperformance in fabric efficiency.

The following u-values, g-values and air tightness are proposed:

Floor u-value	0.14 W/m ² K
External wall u-value	0.14 W/m ² K
Roof u-value	0.11 W/m ² K
Window u-value	1.00 W/m ² K
G-value	0.5
Air permeability rate	2.5 m ³ /hm ² @ 50Pa
Ventilation strategy	Mechanical ventilation with heat recovery
Thermal bridging	Y-value <0.07 W/m ² K

Actions:

- Confirm glazing ratio, and optimize in line with LETI Climate Emergency Design Guide principles in façade design.
- Explore external shading options (except north elevations).
- Confirm no active cooling.

Energy – Green

As part of the Be Green carbon reductions, all new developments must achieve a minimum reduction of 20% from on-site renewable energy generation to comply with Policy SP4.

The application has reviewed the installation of various renewable technologies. The report concludes that air source heat pumps (ASHPs) and solar photovoltaic (PV) panels are the most viable options to deliver the Be Green requirement.

The proposed solar PV provision (approx. 5.28 kWp) is relatively low given the scale of the dwelling and available roof space, and further optimisation should be explored to maximise on-site renewable energy generation in line with Policy SI2 and SP4: maximising on-site renewable energy generation.

Actions:

- Maximise PV coverage in line with Policy SI2 and SP4;
- Provide ASHP specification (capacity, SCOP, % load coverage);
- Confirm whether ASHP serves swimming pool.

4. Carbon Offset Contribution

A carbon shortfall of 6.1 tCO₂/year remains. The remaining carbon emissions will need to be offset at £95/tCO₂ over 30 years.

5. Conclusion

Overall, it is considered that the application **cannot currently be supported** from a sustainability point of view. Actions can be undertaken to address this.