

We have reviewed the additional information submitted by the applicant. Please refer below for our carbon comments.

The applicant has proposed no change to carbon reductions but only provided clarifications to queries on energy, overheating and BREEAM.

The development achieves a reduction of 52% carbon dioxide emissions on site (5.71 tCO₂) from a Building Regulations Part L 2021 compliant building. This is supported in principle.

Planning conditions will be recommended to secure the benefits of the proposal.

<i>Non-residential (no change from the previous submitted information)</i>			
	Total regulated emissions (Tonnes CO₂ / year)	CO₂ savings (Tonnes CO₂ / year)	Percentage savings (%)
Part L 2021 baseline	5.71		
Be Lean	4.56	1.15	20%
Be Clean	4.56	0	0%
Be Green	2.72	1.84	32%
Cumulative savings		2.99	52%
Carbon shortfall to offset (tCO₂)	2.72		
Carbon offset contribution	£95 x 30 years x 2.72 tCO ₂ /year = £7,752		

Be Lean

Applicant has not addressed if the existing building envelope will be thermally upgraded. This will be conditioned.

Be Green

Applicant has indicated solar PV on north side of the roof, but it seems the total output remains at 40kW. Applicant is encouraged to further maximize roof space for PV installation.

Overheating

Applicant has confirmed all the proposed windows are fully openable for purge ventilation.

Applicant has integrated the proposal of external shading to the south facing windows. This is strongly supported.

BREEAM

The submitted BREEAM pre-assessment has estimated the proposal will achieve a score of 64.13% which is equivalent to a “very good” rating.

Actions:

- Applicant to clarify which version of BREEAM the development is assessed against, as the document has stated BREEAM UK New Construction 2018 – Version 7.0 was used. The latest version 7 should be used and will be conditioned.
- Applicant is strongly encouraged to aim for “excellent” rating, as their score is very close to the threshold (over 70%) of “excellent” rating.

Planning Obligations Heads of Terms

- Payment of carbon offset contribution prior to the above ground construction works at £7,752, based on £2,850 per tonne of carbon emissions.

Planning Conditions

Energy Strategy

The development hereby approved shall be constructed in accordance with the Energy and Sustainability statement Issue 1 by EEABS (dated 11th Dec 2025) delivering a minimum 52% improvement on carbon emissions over 2021 Building Regulations Part L, with high fabric efficiencies, air source heat pumps (ASHPs) and a minimum 40 kWp solar photovoltaic (PV) array.

(a) Prior to above ground construction, details of the Energy Strategy shall be submitted to and approved by the Local Planning Authority. This must include:

- *Confirmation of how this development will meet the zero-carbon policy requirement in line with the Energy Hierarchy;*
- *Confirmation of the necessary fabric efficiencies to achieve a minimum 20% reduction, including details to reduce thermal bridging;*
- *Location, specification and efficiency of the proposed ASHPs (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the ASHP pipework and noise and visual mitigation measures;*
- *Specification and efficiency of the proposed Mechanical Ventilation and Heat Recovery (MVHR), with plans showing the rigid MVHR ducting and location of the unit;*

- *Details of the PV, demonstrating the roof area has been maximised, with the following details: a roof plan; the number, angle, orientation, type, and efficiency level of the PVs; how overheating of the panels will be minimised; their peak output (kWp)*
- *Specification of any additional equipment installed to reduce carbon emissions.*

The development shall be carried out strictly in accordance with the details so approved prior to first operation and shall be maintained and retained for the lifetime of the development. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained at least annually thereafter.

(b) The solar PV arrays and air source heat pumps must be installed and brought into use prior to first occupation of the relevant block. Six months following the first occupation of that block, evidence that the solar PV arrays have been installed correctly and are operational shall be submitted to and approved by the Local Planning Authority, including photographs of the solar array, installer confirmation, an energy generation statement for the period that the solar PV array has been installed, and a Microgeneration Certification Scheme certificate.

Reason: To ensure the development reduces its impact on climate change by reducing carbon emissions on site in compliance with the Energy Hierarchy, and in line with London Plan (2021) Policy SI2, and Local Plan (2017) Policies SP4 and DM22.

Overheating

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. The statement should confirm the external shutters as per drawing “2026.06.12.Carbon Comments Drawings” by Prestige Planning & Building Services will be installed as part of the passive mitigation measures.

Reason: In the interest of reducing the impacts of climate change and mitigation of overheating risk, in accordance with London Plan (2021) Policy SI4, and Local Plan (2017) Policies SP4 and DM21.

Living Roof

(b) Prior to the occupation of the development, evidence must be submitted to and approved by the Local Planning Authority that the living roof has been delivered in line with the details as shown on drawings” 2026.06.12.Carbon Comments Drawings” by Prestige Planning & Building Services. This evidence shall include photographs demonstrating the measured depth of substrate, planting and biodiversity measures. If the Local Planning Authority finds that the living roof has not been delivered to the approved standards, the applicant shall rectify this to ensure it complies with the condition. The living roof shall be retained thereafter for the lifetime of the development in accordance with the approved management arrangements.

Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and supports the water retention on site during rainfall. In accordance with London Plan (2021) Policies G1, G5, G6, SI1 and SI2 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.

BREEAM

- a. Prior to commencement on site for the relevant non-residential unit, a Design Stage Assessment and evidence that the relevant information has been submitted to the BRE for a design stage accreditation certificate must be submitted to the Local Planning Authority confirming that the development will achieve a BREEAM “Very Good” outcome (or equivalent), aiming for “Excellent”. The assessment should be carried out based on the latest version of BREEAM. This should be accompanied by a tracker demonstrating which credits are being targeted, and why other credits cannot be met on site.
- b. Within 6 months of commencement on site, the Design Stage Accreditation Certificate must be submitted. The development shall then be constructed in strict accordance with the details so approved, shall achieve the agreed rating and shall be maintained as such thereafter for the lifetime of the development.
- c. Within 6 months of occupation, a Post-Construction certificate issued by the Building Research Establishment must be submitted to the local authority for approval, confirming this standard has been achieved.

In the event that the development fails to achieve the agreed rating for the development, a full schedule and costings of remedial works required to achieve this rating shall be submitted for our written approval with 2 months of the submission of the post construction certificate. Thereafter the schedule of remedial works must be implemented on site within 3 months of the Local Authority’s approval of the schedule, or the full costs and management fees given to the Council for offsite remedial actions.

Reason: In the interest of addressing climate change and securing sustainable development in accordance with London Plan (2021) Policies SI2, SI3 and SI4, and Local Plan (2017) Policies SP4 and DM21.