

		Our ref: HGY/2026/1292 Contact: Kwaku Bossman-Gyamera Date: 24/08/2026
Town and Country Act 1990 (As amended)		
Location:	22 Palace Road, Wood Green, London, N11 2PS	
Proposal:	- Variation of conditions 2, 7 and 13 attached to planning permission HGY/2025/0363. The amendments relate to design detail regarding external appearance (condition 2), the proposed energy strategy (condition 7) and the Considerate Constructors Scheme (condition 13).	

Carbon Management Response 12/06/2026

Documents submitted:

- 250821 - 22 Palace Road - Energy and Sustainability Assessment rev 5

Response

Consented scheme (ref: HGY/2025/0363)

<i>Residential (including new build and refurbished flats)</i>			
	Total regulated emissions (Tonnes CO ₂ / year)	CO ₂ savings (Tonnes CO ₂ / year)	Percentage savings (%)
Part L 2021 baseline	5.6		
Be Lean	3.5	2.2	38.7%
Be Clean	3.5	0.0	0%
Be Green	1.9	1.6	27.6%
Cumulative savings		3.7	66.3%
Carbon shortfall to offset (tCO ₂)	1.9		
Carbon offset contribution	£95 x 30 years x 1.9 tCO ₂ /year = £5,415		

Current proposal (S73):

<i>Residential (including new build and refurbished flats)</i>			
	Total regulated emissions (Tonnes CO ₂ / year)	CO ₂ savings (Tonnes CO ₂ / year)	Percentage savings (%)
Part L 2021 baseline	5.6		
Be Lean	4.9	0.8	14%
Be Clean	4.9	0.0	0%
Be Green	3.7	1.2	20.5%
Cumulative savings		1.9	34.5%
Carbon shortfall to offset (tCO ₂)	3.7		
Carbon offset contribution	£95 x 30 years x 3.7 tCO ₂ /year = £10,545		

Energy Strategy

The current proposed overall carbon reduction is 34.5%, this has significantly reduced from 66.3% of the consented scheme.

Actions:

- The energy performance of the current proposal has deteriorated significantly from the consented scheme. Applicant should explore ways to revise their current energy proposal to align with the consented scheme.

Be Lean

The Be Lean carbon reduction of the consented scheme has also reduced significantly to 14% from 38.7% of the consented scheme. The current proposed thermal performance of the building specifications has been worsened from the consented scheme as below:

	Consented scheme		Current proposal	
	New build	Refurbishment	New build	Refurbishment
External wall U-value	0.16 W/m ² K	0.16 W/m ² K	0.18 W/m ² K	0.18 W/m ² K
Floor U-value	Not provided	0.12 W/m ² K	0.13 W/m ² K	0.25 W/m ² K

Actions:

- The thermal performance of the current proposal building specifications have worsened from the consented scheme. The current proposed external wall U-value have not improved beyond the notional value. As a result the Be Lean carbon reduction has reduced significantly. Applicant should explore ways to align the current proposed building fabric thermal performance with the consented scheme.

Be Green

	Consented scheme		Current proposal	
	New build	Refurbishment	New build	Refurbishment
Heating system	Electric storage heaters. An average SHD of 14.6 kWh/m ² .a has been demonstrated	Electric storage heaters. An average SHD of 14.6 kWh/m ² .a has been demonstrated	Individual ASHPs	Gas boilers
PV output	6 kWp		7 kWp	

Actions:

- This application is proposing a gas boiler system for the refurbished units. All applications should demonstrate how they maximise on-site carbon emission reductions. 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. It would enable this development to align with expectations in mitigating the climate emergency.
- The proposal of ASHPs to the new build is supported, applicant should consider extending the system to the refurbished units.

Overheating

Applicant has not addressed our previous concerns on overheating for the consented scheme. The application site is in close proximity to the railway lines, this potential acoustic constraint might inhibit occupants' ability to open the windows to mitigate OH risk.

The SE facing front elevation is exposed and the large windows on top floor have no external shading, this presents a high overheating risk.

Actions:

- 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.

Conclusion

We cannot support this application currently.

Further information needs to be provided to address our comments in relation to the Energy Strategy and Overheating Strategy.

Carbon Management Response 03/07/2026

Documents submitted:

- Email response from applicant dated 18th June 2026

Response

Applicant has explained the deterioration of the current energy proposal from the consented scheme is that due to financial constraints, they cannot deliver the original consented scheme and therefore requires amendment.

The applicant has also stated they cannot replace the proposed gas boilers with heat pump systems for the refurbished units due to practical and cost reasons, and that they have already delivered 20% carbon reduction from renewable energy. However applicant should note the Local Plan SP4 policy requires all development must achieve a minimum reduction of 20% from on-site renewable energy generation (i.e. PV panels), instead of from heat pumps.

Actions:

- The scheme is proposing a gas boiler which is not supported and goes against Policy SP4 and SI2: to maximise on-site carbon reduction. It is strongly encouraged to replace the gas boiler strategy with a low carbon heating strategy instead to ensure the proposed dwelling is future-proofed and will not have any on-site fossil fuel combustion.
- There are different types of low-carbon heating technologies that suits different applications, applicant should explore all options in order to replace the gas boilers.

Applicant has noted that they will address our previous comments on overheating through planning condition.

Actions:

- Applicant should note passive measures should be prioritised to mitigate overheating and this can have implications to the external appearance, hence applicant is strongly encouraged to take the opportunity to review their OH strategy and to address our previous comments.

Conclusion

We cannot support this application currently. Further information needs to be provided to address our comments in relation to the Energy Strategy.

Carbon Management Response 24/08/2026

Documents submitted:

- 260814 - 22 Palace Road - Energy and Sustainability Assessment rev 6

Response

Current proposal (S73):

<i>Residential (including new build and refurbished flats)</i>			
	Total regulated emissions (Tonnes CO ₂ / year)	CO ₂ savings (Tonnes CO ₂ / year)	Percentage savings (%)
Part L 2021 baseline	5.6		
Be Lean	4.9	0.8	13.6%
Be Clean	4.9	0.0	0%
Be Green	0.9	4.0	71.1%
Cumulative savings		4.8	84.6%
Carbon shortfall to offset (tCO ₂)	0.9		
Carbon offset contribution	£95 x 30 years x 0.9 tCO ₂ /year = £2,565		

Energy Strategy

The current proposed overall carbon reduction is 84.6%, this has improved beyond the 66.3% of the consented scheme. This is supported.

Be Green

ASHPs have been proposed for both new build and refurbishment units for both space heating and domestic hot water. This is supported.

Applicant has also provided the indicative locations of the ASHP units as follows:



Figure 10: Indicative heat pump layout (outlined in black)

The proposed capacity of the PV array has remained at 7.0 kWp.

Conclusion

The revised ES has proposed an improved overall carbon reduction beyond that of the consented scheme, this application can be supported in principle.

Planning Obligations Heads of Terms for the Head of Variation

- Payment of carbon offset contribution prior to the above ground construction works at £2,565, based on £2,850 per tonne of carbon emissions.

Planning Conditions

Planning conditions of approved planning scheme HGY/2025/0363 have been updated as below to reflect the changes of the current application with superseded text ~~crossed-out~~ and new text underlined and highlighted in red.

Condition 7 – Energy Strategy

*The development hereby approved shall be constructed in accordance with the 22 Palace Road - Energy & Sustainability Assessment (dated 14th August 2026) ~~Update with TM54 by Integrationuk (dated 06th of May 202)~~ delivering a minimum ~~66.3%~~ **84.6%** improvement on carbon emissions over 2021 Building Regulations Part L, with high fabric efficiencies, **air source** heat pumps **for both new built and refurbished units** ~~domestic hot water~~, mechanical ventilation and heat recovery (MVHR) and a minimum ~~3 kWp~~ **7.0 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 ~~38.7%~~ **13.6%** reduction, including details to reduce thermal bridging;
- Location, specification and efficiency of the proposed **air source** heat pumps for domestic hot water **and space heating** (Coefficient of Performance, Seasonal Coefficient of Performance, and the Seasonal Performance Factor), with plans showing the heat pump locations;
- 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 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.