HGY/2026/2421 Ashley Park: response to the applicant's letter of 9 November 2026

Author: Dean Lubaki for the Millstream Tower Residents' Association

16 November 2026

Dear Philip Elliott, Tefera Tibebe, Councillors,

We respond to the applicant's letter of 9 November 2026 (ref 41795886v3) and its Energy Strategy Response of 5 November 2026. Neither answers our objection of 10 October or our supplementary representation of 16 October 2026.

One Page Summary

On every policy-based objection, the applicant answered a question we did not ask.

1. **Victoria line as source of low-carbon excess heat source.** We proposed a low-temperature network using heat from the Victoria line next to the site. The applicant rebutted a connection to Bunhill, a Northern line scheme in Islington, that nobody proposed. It passed over Silvertown, where a fifth-generation network of the kind we proposed is already being built.
2. **Shared district heat network.** Haringey policy (SP4 2(a), DM22 C) requires communal systems to look beyond the site boundary, and around 1,400 neighbouring homes are ready to connect. The applicant refuses even a network across its own site, against the GLA's request.
3. **Overheating.** We raised bedrooms whose windows must stay closed at night. The letter never mentions closed windows, and the cooling results are still missing.
4. **Residents' heating costs.** We asked what residents will pay. The applicant answered only on carbon.

The applicant says it wants to work with the community. Before objecting, we sent it an advance draft and were available to answer any question. It asked none, then answered a proposal we never made. Millstream Tower shows what happens when the Council accepts a developer's word: its residents now carry the cost.

We ask that the applicant publish its TfL correspondence, assess the network we actually proposed, and that every commitment on heat, overheating and costs be backed by evidence and secured by condition or s106 before determination.

Each point below follows our objection and sets out three things: **the policies we said the proposal does not meet**, **what the applicant said**, and **why the response does not resolve that non-compliance**.

Point 1: Heat from the Victoria line was never assessed

Policy we said it does not meet: London Plan SI 3 D(b). The Victoria line runs about 30 metres from the site. TfL's 2019 screening by Arup ranked the nearby shaft second of 55 sites, with "no perceivable barrier to installation". TfL shelved it only because there was no heat customer nearby. Ashley Park is that customer, along with the surrounding developments already built ready to connect to a shared network under their s106 obligations. We proposed a fifth generation, low-temperature network that heats and cools.

What the applicant said. It has "engaged with TfL, the operator of the Bunhill heat network and Energetik". Tube heat is low-grade (30–40°C) and heat pumps "must raise it to the 60–80°C". Bunhill benefits from sitting above a disused station, and its operator says "a connection is not currently feasible". Such schemes are "best delivered at a network scale" by others.

Why this does not resolve the non-compliance with SI 3 D(b).

- **We never proposed connecting to Bunhill.** We cited it only as proof that Tube heat already warms London homes.
- **Bunhill uses a different Tube line.** Bunhill 2 draws heat from a Northern line shaft in Islington. Our objection is about the Victoria line, London's hottest Tube line, next to this site. The applicant's answer is about a different line, a different shaft and a different borough.
- **The 60–80°C problem belongs to older, high-temperature networks like Bunhill, not to modern fifth generation heating and cooling networks like the one we proposed.** A fifth generation network runs at around 20–30°C, and heat pumps in each building raise the temperature locally.
- **The applicant looked at the wrong example.** At Silvertown in London, E.ON's ectogrid already shares heat and cooling between buildings at around 20–30°C; its first 106 affordable homes were delivered in late 2025.
- **No evidence of the TfL engagement is provided.** The applicant supplied its Energetik correspondence, but nothing from TfL. This means you cannot scrutinise whether the applicant actually asked TfL the right questions.

Point 2: No shared network, though the neighbours are ready to connect

Policies we said it does not meet: Haringey SP4 2(a) and DM22 C. Around 1,400 neighbouring homes, including the Council's own Depot homes, were required to be ready to connect to a district energy network. A network built with Ashley Park could serve them. Haringey policy requires this to be explored:

- Strategic Policy SP4 2(a) requires "all developments to assess, identify and implement, where viable, site-wide and area-wide decentralised energy facilities including the potential to link into a wider network".

- Policy DM22 C requires communal systems to "optimise opportunities for extending such systems beyond the site boundary to supply energy to neighbouring existing and planned future developments".

What the applicant said. Extracting and distributing Tube heat "would need network-scale infrastructure crossing third-party land, which is not feasible as part of this Application". It will be "future-proofed" for a future network. Each building will have its own connection point, because "the future buildings will be operated entirely independently of one another" (5 November response, p.4).

Why this does not resolve the non-compliance with SP4 2(a) and DM22 C.

- **Crossing third-party land is a reason the task is hard, not the assessment policy requires.** SP4 2(a) and DM22 C exist precisely because the best energy solutions cross site boundaries.
- **The applicant refuses even a network across its own site.** The GLA asked it to minimise energy centres and lay pipes between blocks so they can join one site-wide network (GLA energy memo, comment 9). The applicant answered that each building will run independently.
- **The GLA has not accepted the position.** It still rates Policy SI 3 as "Potential Compliance – Pending Information", with the drawings for a future-proofed connection "not yet received".

Point 3: Overheating with windows closed

Policies we said it does not meet: London Plan SI 4 and Haringey DM21. Many bedrooms must keep their windows closed at night because of noise. With windows closed, the applicant's own modelling showed bedrooms failing the overheating standard, and the proposed cooling module was unevidenced (London Plan SI 4; Haringey DM21). Neighbouring residents already live with this problem.

What the applicant said. "Perforated panels" and "overhanging balconies" assist, and the affordable housing block "has less potential for overheating given its height and location" (letter, p.19).

Why this does not resolve the non-compliance with SI 4 and DM21.

- **The letter does not mention closed windows at all,** which was the whole of our point.
- **The claim about the affordable block comes with no evidence.**
- **The technical answer relies on mechanical cooling,** and its results are still missing. The GLA is waiting for the overheating results with that cooling applied, the number of homes affected and the controls (memo, comment 6). Results for corridors, including heat from communal pipework, are "to follow" (5 November response, p.10).
- **If cooling is needed, the network we proposed is the lowest-carbon way to provide it.** Haringey's cooling hierarchy allows active cooling only as a last step,

"ensuring they are lowest carbon options" (DM21, paragraph 4.31). Cooling units in each flat pump the heat they remove out of the building and waste it. A fifth generation network carries that heat away in its shared loop, so it can warm other homes or hot water, or be stored for winter.

Point 4: Running costs for residents

The concern we raised: affordability (Haringey SP2; DM22 supporting text, paragraphs 4.46 and 4.55). Neighbours on communal heating already pay about £1,555 a year for heat, 2.0 to 2.4 times the Ofgem price cap, with no price protection and no way to switch. Ashley Park's 87 social rent households face the same risk.

What the applicant said. Its letter records that residents asked about "lower heating costs for residents", then answers only on carbon: the scheme is "fossil-fuel free" and achieves "approximately 60% carbon reduction".

Why this does not respond to our concern. Carbon savings say nothing about what residents will pay. The applicant gives no heat price, standing charge or cost comparison.

We engaged early, in good faith

The applicant says it wants to "support and meet the needs of the existing and future community", that "sustainability [was] considered throughout the design", and that interested parties can "continue to engage with the applicant and its engagement team" (letter of 9 November 2026, pp.2–3).

We believed that. Before submitting our objection, we wrote directly to the applicant with an advance draft, so there was time to find a solution together. The applicant had our contact details and knew we were available to answer any question about our proposal. It did not ask any.

That is why this response is so disappointing. Instead of sending us a draft to ensure it actually answered our concerns, the applicant answered a proposal we never made.

A developer that wants to work with the community starts by reading what the community wrote.

It also shows, once again, why an applicant's word is not enough. Every commitment Ashley Park makes, on heat networks, overheating and running costs, must be backed by evidence, not words. It must also be secured in a legally binding condition or s106 obligation, with clear terms and public monitoring reports, so the Council can enforce it and the community can see whether it is kept.

Millstream Tower shows what happens otherwise. When the Council approved it (HGY/2016/3932), it took Newlon Housing Trust at its word twice:

- **On heating.** The Council accepted Newlon's communal heating strategy. Newlon's own figures, confirmed in writing in October 2026, now show that about 50% of the energy its gas network burns is lost before it reaches residents.
- **On costs.** The committee relied on Newlon's management to keep the homes affordable, against Haringey's benchmark that mortgage, rent and service charges together should not exceed 45% of net household income. Only income limits for buyers were secured in the s106. The service charge side rested on Newlon's assurance.

Neither promise was secured in a form anyone can enforce. Millstream's leaseholders are now left holding the bag for both, with no support from the Council.

A request to officers and councillors: hold the applicant to the question asked

We ask officers, GLA staff and councillors to check each of the applicant's answers against the question actually asked, not against a question the applicant has chosen to answer instead.

Tottenham Hale's recent history shows why. As our objection evidenced, buildings here were approved with heat network connections that never arrived, overheating assessments that assumed open windows, and heating that now costs up to 2.5 times the price cap. Each was answered at the time with reassurances that sounded complete and were not.

We do not blame officers or councillors. They are understandably overstretched and review many applications at once, under time pressure. Applicants know this, and responses like this one rely on it: a strawman wrapped in technical language that effectively wears reviewers down into acceptance. If it goes unchallenged, the gap becomes residents' problem for decades.

The 9 November letter is an example. It answers a Northern line scheme nobody proposed instead of the Victoria line network we did. Either the applicant did not read our proposal, or it chose to answer one we never made.

What we ask

1. **Publish the TfL evidence.** The applicant should publish in full its correspondence and meeting notes with TfL, Bunhill's operator and Energetik on secondary heat, including the questions it asked. We are submitting a further Freedom of Information request to TfL covering the applicant's contacts on this site. It will show whether the applicant asked TfL the questions our objection raised.
2. **Answer the proposal as submitted.** Before determination, the applicant should assess a fifth generation heating and cooling network using the Victoria line and Down Lane Park storage, with reference to Silvertown, under SP4 2(a), DM22 and SI 3 D(b). It should engage neighbouring freeholders whose buildings are ready to connect.

3. **Secure the future-proofing offer.** The applicant offers to be ready for "any future heat network drawing on secondary heat sources". If permission is granted, that should be secured in the s106 with specific terms: connection points, safeguarded pipe routes between blocks and to the site boundary, plant space and a low-temperature-compatible design.
4. **Publish the overheating results.** The outstanding results should be published, and the developer's ownership of overheating risk secured by condition, before determination.
5. **Answer on costs.** The applicant should state the expected heat price and standing charge for residents, compared with the Ofgem price cap.

Kind regards,

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Sources

- Haringey Development Management DPD (July 2017)
- Dimplex: Zeroth and E.ON's ectogrid at Silvertown Plot 6
- Ashley Park response letter to consultees and third parties, 9 November 2026, pp.16, 19
- Meinhardt Energy Strategy Response, 5 November 2026, pp.3–4, 10
- GLA energy memo spreadsheet, Energy Comments sheet, comments 6 and 9

SP4: WORKING TOWARDS A LOW CARBON HARINGEY

Over the life time of the Local Plan, reducing energy use in buildings and working towards a low carbon borough will be one of the key challenges facing Haringey. The Council will promote the measures outlined below to reduce carbon emissions from new and existing buildings.

1. In line with London Plan policy, the Council will promote and require all new developments to take measures to reduce energy use and carbon emissions during design, construction and occupation, by incorporating the following measures:
   a. From 2011 onwards, all new residential development will achieve a minimum 25% reduction in total (regulated) CO_2 emissions in line with Code for Sustainable Homes Level 4 energy standards, and should aim to achieve Level 6. All new residential development shall be zero carbon from 2016 onwards; and
   b. From 2011 onwards all new non-residential development shall be built to at least BREEAM "very good" standard and should aim to achieve BREEAM "excellent" or the current nationally agreed standard. All new non-residential development shall be zero carbon from 2019.
2. The Council will promote low- and zero-carbon energy generation through the following measures:
   a. Requiring all developments to assess, identify and implement, where viable, site-wide and area-wide decentralised energy facilities including the potential to link into a wider network;
   b. Establishing local networks of decentralised heat and energy facilities by requiring developers to prioritise connection to existing or planned networks where feasible;
   c. Working with neighbouring boroughs and other partners to explore ways of implementing sub-regional decentralised energy networks including the potential in the Upper Lee Valley Opportunity Area; and
   d. All new developments are required, where viable, to achieve a reduction in predicted carbon dioxide emissions of 20% from on site renewable energy regeneration, which can include connections to local sources of decentralised renewable energy.

Climate Change in Haringey

4.1.5 Regional studies indicate that London will expect climatic changes of hotter summers and wetter winters with incidences of heat waves and flash flooding becoming more frequent.

4.1.6 The Council aims to reduce the carbon footprint of development in Haringey. This includes the efficient use of land and buildings in order to reduce car dependency, the implementation of an energy hierarchy in building design and construction, the use of energy from more efficient sources such as decentralised energy networks (or making connections to such networks feasible in the future) and by requiring the generation of energy on-site by use of renewable energy.

4.1.7 The Council's overall strategy for managing future growth in Haringey is to steer new development with high transport demand to areas with significant redevelopment opportunities at, or near, transport hubs; to support sustainable modes of travel by minimising car parking provision in new development; to increase cycle parking provision and encourage modal shift through travel planning and design of public realm to support non-car use (please see SP1 Managing Growth and SP7 Transport).

4.1.8 The Council commissioned a report on carbon reduction scenarios (2006) for Haringey, which found that use of fossil fuel based energy in domestic buildings is responsible for almost 50% of CO_2 emissions in the borough. This relates to space heating and cooling, lighting, cooking and other energy use in our homes. The study assessed the necessary measures to meet the adopted target of reducing CO_2 emissions by 60% by 2050 on a 1990 baseline. These include:

- Renewable energy systems, both integrated and stand alone;
- Energy efficiency improvements to the existing building stock;
- Transport demand reduction and shift to sustainable transport modes;
- Community heating network served by combined heat and power (CHP); and
- CHP for large buildings such as hospitals and schools.

POLICY DM22: DECENTRALISED ENERGY

A Subject to other policy requirements, proposals that contribute to the provision and use of Decentralised Energy network infrastructure will be supported.

Communal energy systems

B All development that incorporates site-wide communal energy systems should examine opportunities for extending such systems, irrespective of whether it is connected to a DE network.

C All development that incorporates site-wide communal energy systems should optimise opportunities for extending such systems beyond the site boundary to supply energy to neighbouring existing and planned future developments.

Existing and planned future DE networks

D All development proposals should prioritise connection to existing or planned future DE networks.

E All major development located within 500 metres of an existing DE Network, and minor new-build development located within 25 metres, will be expected to secure connection to that network subject to demonstration of technical feasibility and financial viability.

F All major development located within 500 metres of a planned future DE Network, which is considered by the Council likely to be operational within 3 years of a grant of planning permission, will be expected to secure connection to that network subject to demonstration of technical feasibility and financial viability.

DE network 'connection zones'

G All major development located within 500 metres of a DE network 'connection zone' should be designed for connection to a DE network.

H All minor new-build development located within 25 metres of a DE network 'connection zone' should be designed for connection to a DE network.

Customer charters

I Where site-wide communal and district heating systems are operational, the Council will strongly encourage heat and energy service providers to enter into customer charters with domestic and micro-business customers.

4.41 Decentralised Energy is supported by both national and regional policy as a means of meeting requirements of the Climate Change Act on carbon emission reduction. The London Plan includes a target for 25% of heat and power used in London to be generated through the use of localised DE systems by 2025.

4.42 Policy SP4 broadly supports DE networks as part of a package of measures to assist in delivering more energy efficient development and working towards a low carbon Borough. This policy sets further detailed requirements to assist with implementation of these strategic objectives. In line with the London Plan, all development proposals will be expected to select energy systems in accordance with the Mayor's energy hierarchy.

4.43 All major development should incorporate site-wide communal energy systems that serve all energy demands within the development from a common system, irrespective of whether it is connected to a DE network. Proposals should give consideration to systems that connect different uses and/or groups of buildings, both within and extending beyond the development site.

4.44 New development should have the ability to connect to DE networks where reasonably possible. This will ensure that the opportunities and benefits of using DE networks are fully maximised now and in future years. Whilst a DE network may not be in place at the time of a development's construction, it is important that the development is readily able to connect to such a network if or when it becomes available.

4.45 In locations of existing or planned future DE networks, the Council will expect applicants to fully investigate the feasibility of network connections and other opportunities for increasing DE network access, including through infrastructure upgrades and network expansion. The Council has commissioned an Energy Masterplan for Haringey that identifies key opportunities for DE network development. It has informed the distance thresholds for existing or planned future DE networks where connection is expected.

4.46 Where connections to DE networks are expected, applicants must submit a feasibility assessment so that the Council can determine whether connection is feasible. In this area of policy, feasibility includes considerations of technical feasibility and financial viability. There are recognised ways of assessing these aspects of deliverability. This will ensure that requirements are not imposed on developers that could lead to uneconomic costs on occupiers.

2) identify existing heating and cooling networks, identify proposed locations for future heating and cooling networks and identify opportunities for expanding and inter-connecting existing networks as well as establishing new networks.

D Major development proposals within Heat Network Priority Areas should have a communal low-temperature heating system:

1) the heat source for the communal heating system should be selected in accordance with the following heating hierarchy:
   a) connect to local existing or planned heat networks
   b) use zero-emission or local secondary heat sources (in conjunction with heat pump, if required)
   c) use low-emission combined heat and power (CHP) (only where there is a case for CHP to enable the delivery of an area-wide heat network, meet the development's electricity demand and provide demand response to the local electricity network)
   d) use ultra-low NOx gas boilers
2) CHP and ultra-low NOx gas boiler communal or district heating systems should be designed to ensure that they meet the requirements in Part B of Policy SI 1 Improving air quality
3) where a heat network is planned but not yet in existence the development should be designed to allow for the cost-effective connection at a later date.

E Heat networks should achieve good practice design and specification standards for primary, secondary and tertiary systems comparable to those set out in the CIBSE/ADE Code of Practice CP1 or equivalent.

9.3.1 The Mayor will work with boroughs, energy companies and major developers to promote the **timely and effective development of London's energy system** (energy production, distribution, storage, supply and consumption).

9.3.2 London is part of a national energy system and currently sources approximately 95 per cent of its energy from outside the GLA boundary. Meeting the **Mayor's zero-carbon target by 2050** requires changes to the way we use and supply energy so that power and heat for our buildings and transport is generated from local clean, low-carbon and renewable sources. London will need to shift from its

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POLICY DM21: SUSTAINABLE DESIGN, LAYOUT AND CONSTRUCTION

A All new development, including building and landscape works, will be expected to consider and implement sustainable design, layout and construction techniques. Proposals should:

- a Apply the energy hierarchy to minimise energy use in order to meet, and if possible exceed, minimum carbon dioxide reduction requirements;
- b Apply the cooling hierarchy to reduce the potential for overheating and limit reliance on mechanical air conditioning systems;
- c Maximise opportunities to enhance biodiversity on-site, including through appropriate landscaping, Sustainable Drainage Systems, living roofs and green walls
- d Wherever possible, use building materials with high environmental performance ratings; and
- e Seek opportunities for locally sourced labour.

B The Council will support appropriate measures to sustainably retrofit existing homes and non-residential buildings.

C Proposals that fail to demonstrate adequate consideration for sustainable design, layout and construction techniques will be resisted.

D Consideration will be given to the use of carbon offset payments, to be secured by planning obligations, where it can be demonstrated that proposals are unable to meet carbon dioxide emission reduction targets on-site.

4.25 The principles of sustainable design, layout and construction are set out in London Plan Policy 5.3. The principles cut across a number of policies in this Local Plan and all proposals should positively respond to them by engaging with the Haringey Development Charter (see Policy DM1). The application of sustainable design principles can help to improve the environmental performance of buildings, making them more resilient to climate change and mitigating their effect on it. Sustainable design and construction therefore provides clear environmental advantages. It also offers social and economic benefits. This includes more efficient buildings with cheaper operating costs, which is of benefit to future owners or occupiers and particularly those at risk of fuel poverty.

4.26 The London Plan requirements for major development may not be fully financially viable or technically feasible for minor and household development. Much will depend on individual site circumstances and the nature and scale of development proposed. However, the Council is mindful of the cumulative impact of development in the Borough and will therefore seek to ensure that all proposals adequately investigate and deliver opportunities for incorporating sustainable design, layout and construction principles wherever possible. Consideration should be made at the very early stage in the design process to ensure maximum use and benefit.

4.27 For assistance with implementation of this policy applicants are encouraged to refer to Haringey's Sustainable Design and Construction Supplementary Planning Document and other relevant London Plan guidance.

Energy efficiency

4.28 London Plan Policy 5.2 states that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy, as follows:

1 Be lean: use less energy
2 Be clean: supply energy efficiently
3 Be green: use renewable energy

4.29 The first step in the hierarchy should be met through adopting sustainable design principles. The second step should be met by prioritising decentralised energy, for which local requirements are set out below (see Policy DM22). The third step is to use renewable energy.

4.30 London Plan Policy 5.2 requires reductions in regulated CO2 emissions over the 2010 Building Regulations (Part L) with a graduated tightening of standards to achieve zero carbon by 2016 to residential buildings and 2019 for non-domestic buildings. The policy reflects the Government's previous intention to introduce a step-change in the national Building Regulations. However, the Summer Budget 2015 states that the Government will not progress with the proposed 2016 increase in on-site energy efficiency standards, but keep these under review.[11] The Council will continue to monitor changes in higher level policy and ensure proposals meet the appropriate minimum required reduction in carbon emissions on-site by prioritising use of the energy hierarchy.

11 Fixing the Foundations: Creating a More Prosperous Nation. Department for Business Innovation and Skills. 2015.

Overheating and cooling

4.31 Development proposals should seek to integrate the cooling hierarchy in accordance with sustainable design, layout and construction principles. This will help to ensure that buildings are better equipped to manage their cooling needs in energy efficient ways over their lifetime. This policy applies the cooling hierarchy set out in the London Plan:

1 Minimise internal heat generation through energy efficient design

2 Reduce the amount of heat entering a building in summer through orientation, shading, albedo, fenestration, insulation and green roofs and walls

3 Manage the heat within the building through exposed internal thermal mass and high ceilings

4 Passive ventilation

5 Mechanical ventilation

6 Active cooling systems (ensuring they are lowest carbon options)

4.32 Measures at the highest priority level of the cooling hierarchy should be applied to the fullest extent possible before relevant measures at the next level are considered.

4.33 Applicants will be expected to undertake dynamic thermal modelling to ensure that the development does not overheat. This is particularly important for south facing dwellings, top floor living accommodation and development proposed for users that are more susceptible from overheating risk (elderly, long term sick, young children). The GLA has developed with the Chartered Institute of Building Services Engineers (CIBSE) guidance for developers to address the risk of overheating in buildings. This document is titled 'TM49: Probabilistic design summer years for London'. This dynamic modelling should address future temperatures likely to be experienced over the lifetime of the development. Alongside this model applicants should submit evidence showing how the principles of the cooling hierarchy have influenced the design.

Sustainable retrofitting

4.34 Existing building stock in Haringey factors significantly in local carbon emissions. The Borough's interactive heat loss map[12] indicates that many residential properties are energy inefficient. Sustainable retrofitting offers an opportunity to improve the environmental performance of existing buildings particularly where conversions, refurbishments, changes of use and extensions are proposed.

4.35 This policy seeks to encourage proposals for minor and householder development to incorporate energy efficient measures (such as internal roof, floor and wall insulation) as a cost-effective way to reduce carbon emissions. External wall insulation is also supported in principle although any such treatment must be sympathetic to character and historic significance of the existing building and surrounding area, having regard to other Local Plan policies, particularly Policies DM1 and DM9. The use of energy efficient appliances is also strongly recommended as a simple way to reduce energy use and carbon emissions.

12 London Heat Map.

Enhancing biodiversity

4.36 Urban greening can make an important contribution not only to biodiversity and amenity but also to climate change adaptation. Living roofs (green and brown roofs) and green walls offer many environmental benefits such as improving the thermal performance of buildings, reducing on-site energy demands and limiting the 'urban heat island' effect. They also contribute to sustainable drainage by absorbing rainfall, reducing run-off and improving water quality.

4.37 The Council will strongly encourage the incorporation of urban greening measures where vertical surfaces face public spaces, particularly to enhance the visual appearance of buildings and improve public amenity. However, it is recognised that living roofs and walls may not be appropriate in certain settings, such as Conservation Areas, and the policy will be applied subject to individual site circumstances. Applicants are encouraged to refer the GRO Green Roof Code (2014) which is accepted good practice guidance.

Materials and locally sourced labour

4.38 The type and source of materials used for the construction of buildings has a major impact on sustainability. It is now common for building materials and their components to be assessed in terms of their environmental impact across their entire life cycle, including through energy ratings. The Council encourages applicants to use materials with high environmental performance ratings wherever possible.

4.39 The use of locally sourced labour has many benefits, including support for the local economy through provision of local jobs and limiting environmental impacts by reducing travel distance and promoting sustainable travel modes.

Carbon Offsetting

4.40 The London Plan currently provides that boroughs may establish carbon offsetting arrangements in order to maximise carbon emission reductions. Subject to Government and regional policy, the Council will give consideration to the use of carbon offsetting payments where it can be suitably demonstrated that proposals are unable to meet carbon emissions reductions targets on-site. Further details in this regard are set out in the Council's Planning Obligations SPD. Carbon costing will be established using a recognised price of carbon in line with London Plan supplementary planning guidance, or further local guidance as appropriate.