

		Our ref: HGY/2025/2352 Contact: Gareth Prosser Date: 16/04/2026
Town and Country Act 1990 (As amended)		
Location:	300-306 West Green Road, London N15 3QR	
Proposal:	Approval of details pursuant to condition 10 (Energy Assessment) attached to planning permission HGY/2020/0158	
Wording of condition:	(a) Prior to the commencement of development there shall have been submitted to and approved in writing by the local planning authority an updated Energy Assessment that demonstrates a carbon dioxide reduction of at least 76% against a Building Regulations 2013 Part L scheme for the domestic element and 58% for the non-domestic element. - The updated assessment should include: a minimum fabric efficiency improvement of 10% and 15% respectively for the domestic and non-domestic elements of the scheme under the Be Clean requirements; - reduction in reliance on active cooling to overcome the overheating risks; - a strategy to demonstrate the hot water, heating and cooling systems, whether this is a communal, individual or hybrid system, with a schematic of the heat and hot water systems, showing flow return temperatures; - an estimate of the heating and/or cooling energy the air source heat pump (ASHP) would provide to the development and the electricity the heat pump would require for this purpose; details of the Seasonal Coefficient of Performance (SCOP) and Seasonal Energy Efficiency ratio (SEER) of the ASHPs, which should be used in the energy modelling; evidence that the heat pump complies with other relevant issues as outlined in the Microgeneration Certification Scheme Heat Pump Product Certification Requirements; location of ASHP, and if required, the mitigation measures (noise/visual); evidence that the heat pump complies with other relevant issues as outlined in the Microgeneration Certification Scheme Heat Pump Product Certification Requirements; - confirmation of the maximum possible solar photovoltaic (PV) energy to be generated on the roof, including: 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). (b) Within 6 months of completion, a final Energy Assessment must be submitted to the Local Planning Authority to demonstrate achieved carbon emission savings on site and calculate the carbon offset contribution, if required. (c) The proposed 19.25 kWp solar array should aim to generate at least 23,562 kWh of renewable electricity per year. The solar PV array shall be installed with monitoring equipment prior to completion and shall be maintained and cleaned at least annually thereafter.	

Carbon Management Response 02/02/2026

Documents submitted:

- Energy Report prepared by Environmental-economics (dated 27 Jan 26)

Response

Consented scheme:

Part L 2013 (SAP10 carbon factors)	Residential	Commercial
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	Total regulated emissions (Tonnes CO ₂ / year)	CO ₂ savings (Tonnes CO ₂ / year)	Percentage savings (%)	Total regulated emissions (Tonnes CO ₂ / year)	CO ₂ savings (Tonnes CO ₂ / year)	Percentage savings (%)
Baseline	19			10		
Be Lean	17		11%	8		15%
Be Clean	17		0%	8		0%
Be Green	4		65%	4		43%
Cumulative savings	15		76%	6		58%
Carbon shortfall to offset (tCO ₂)	4			4		
Carbon offset contribution	£95 x 30 years x 8 tCO ₂ /year = £22,800					

Consented **Current** scheme (residential):

<i>Site-wide (Part L 2013 SAP10 carbon factors)</i>			
	Total regulated emissions (Tonnes CO ₂ / year)	CO ₂ savings (Tonnes CO ₂ / year)	Percentage savings (%)
Part L 2013 baseline	21		
Be Lean	15.5	5.5	26%
Be Clean	15.5	0.0	0%
Be Green	2.1	13.3	64%
Cumulative savings		18.9	90%
Carbon shortfall to offset (tCO ₂)	2.1		
Carbon offset contribution	£95 x 30 years x 2.1 tCO ₂ /year = £6,014		
10% management fee	10%		

Energy Strategy

The current proposal has achieved an overall 90% carbon reduction. This has gone beyond the carbon reductions of the consented scheme (76% for domestic and 58% for commercial), this is supported.

Actions:

- The current site-wide baseline is 21 tCO₂/year, this has decreased from the combined baseline 29 tCO₂/ year of the consented scheme. Applicant to provide an explanation.

Be Lean

The Be Lean reduction is 26% which goes beyond improvement of 10% and 15% respectively for the domestic and non-domestic. This is supported.

	Consented scheme	Current proposal
Floor u-value	0.11 W/m ² K	0.11 W/m ² K
External wall u-value	0.12 W/m ² K	0.11-0.2 W/m ² K
Roof u-value	0.12 W/m ² K	0.08 – 0.11 W/m ² K
Door u-value	0.9 W/m ² K	1.80 W/m ² K
Window u-value	1.1 W/m ² K	1.0 W/m ² K
Air permeability rate	3.5 m ³ /hm ² @ 50Pa	3.8 m ³ /hm ² @ 50Pa

Actions:

- While the roof U-value of the current proposal has improved from the consented scheme, the external wall U-value has changed from 0.12 W/m²K of the consented scheme to the current range between 0.11 – 0.2 W/m²K. It seems the SAP worksheet has demonstrated a large proportion of external wall has been specified with a higher U-value (i.e. poorer thermal performance) than the consented scheme. Applicant should clarify if it is the case and confirm if the external wall U-value of the consented scheme can be reinstated in the current proposal.
- The submitted BRUKL worksheet has shown very high U-values of the wall (0.37 W/m²K) and floor (0.72 W/m²K) have been used for the commercial unit. Applicant should clarify why the proposed thermal performance is so poor and should improve the proposed building fabric.

Be Green

The applicant has changed to the current proposal of Exhaust Air Heat Pump (EAHP) from Air Source Heat Pump (ASHP) of the consented scheme. They have confirmed that the EAHP will provide heating to meet 100% space heating and domestic hot water demands.

The current development has proposed a solar array of 19.25 kWp, this matches the PV proposal of the consented scheme.

Actions:

- Applicant to provide an explanation on the change of heating system from ASHP to EAHP, and confirm that this will not decrease the carbon reduction and confirm this will not result in higher energy bills for the occupants.
- Details of the proposed EAHP specifications should be submitted.

Conclusion:

Further information is required so we therefore **do not recommend** discharging Condition 10. The applicant should provide a response to the points raised above and issue updated plans/information where required.

Carbon Management Response 23/03/2026

Documents submitted:

- Energy Report v2 prepared by Environmental-economics (dated 10 Mar 26)

Response

Current proposal – Part L 2013 (SAP 10)

Part L 2013 (SAP10)	Residential			Commercial		
	Total regulated emissions (Tonnes CO ₂ / year)	CO ₂ savings (Tonnes CO ₂ / year)	Percentage savings (%)	Total regulated emissions (Tonnes CO ₂ / year)	CO ₂ savings (Tonnes CO ₂ / year)	Percentage savings (%)
Baseline	18.6			12.2		
Be Lean	12.6	6.0	26%	8.4	3.7	31%
Be Clean	12.6	0.0	0%	8.4	0.0	0%
Be Green	8.3	4.3	23%	4.8	3.7	30%
Cumulative savings	-	10.3	49%	-	7.4	61%

Carbon shortfall to offset (tCO ₂)	8.3			4.8		
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<i>Site-wide (Part L 2013 SAP10 carbon factors)</i>			
	Total regulated emissions (Tonnes CO ₂ / year)	CO ₂ savings (Tonnes CO ₂ / year)	Percentage savings (%)
Part L 2013 baseline	30.8		
Be Lean	21.0	9.7	32%
Be Clean	21.0	0.0	0%
Be Green	13.0	8.0	26%
Cumulative savings		17.7	58%
Carbon shortfall to offset (tCO ₂)	13.0		
Carbon offset contribution	£95 x 30 years x 2.1 tCO ₂ /year = £37,050		
10% management fee	10%		

Current proposal – Part L 2013 (SAP 2012)

Part L 2013 (SAP2012)	Residential			Commercial		
	Total regulated emissions (Tonnes CO ₂ / year)	CO ₂ savings (Tonnes CO ₂ / year)	Percentage savings (%)	Total regulated emissions (Tonnes CO ₂ / year)	CO ₂ savings (Tonnes CO ₂ / year)	Percentage savings (%)
Baseline	21.0			27.1		
Be Lean	15.5	5.5	26%	18.8	8.3	31%
Be Clean	15.5	0	0%	18.8	0.0	0%
Be Green	10.6	4.8	23%	10.6	8.2	30%
Cumulative savings	-	10.3	49%	-	16.5	61%
Carbon shortfall to offset (tCO ₂)	10.6			10.6		

<i>Site-wide (Part L 2013 SAP2012)</i>			
	Total regulated emissions (Tonnes CO ₂ / year)	CO ₂ savings (Tonnes CO ₂ / year)	Percentage savings (%)
Part L 2013 baseline	48.1		
Be Lean	34.3	13.9	29%
Be Clean	34.3	0.0	0%
Be Green	21.3	13.0	27%
Cumulative savings		26.8	56%
Carbon shortfall to offset (tCO ₂)	21.3		
Carbon offset contribution	£95 x 30 years x 21.3 tCO ₂ /year = £60,705		
10% management fee	10%		

The revised ES has inconsistently reported carbon reductions using both SAP 10.0 and SAP 2012. SAP 2012 was used for reporting domestic carbon emissions while SAP 10 was used for non-domestic. For clarify purposes, carbon reductions have been extracted from the GLA carbon reporting emissions spreadsheet (see tables above) and figures from SAP 10.0 should be used for comparison against the original consented scheme.

Actions:

- The current predicted domestic carbon reduction has deteriorated from the previous ES and the applicant has not explained the reasons for the changes.
- The current domestic carbon reduction has only achieved 49% overall, it has failed to achieve the minimum 76% as stated in the planning condition.
- Applicant should provide an explanation and mitigation measures to meet the planning conditions.

Be Lean

The SBEM assessment specifications sheet has indicated the high U-values of external walls are for basement well, whereas the proposed U-value for external wall is 0.129 W/m²K.

Be Green

The revised ES has proposed EAHPs as the heating systems for the domestic units and ASHPs for the commercial units.

A solar array of 20.40 kWp has been proposed to the commercial unit.

Actions:

- Applicant has explained there would be no difference in running costs between an ASHP and EAHP providing the homeowner is aware on how the EAHP operates.
- We cannot agree on this reason. Unlike ASHPs, the amount of heat EAHPs can extract is limited to the amount of exhaust air within the dwelling units. And usually in order to meet the full demand of space heating and domestic hot water, back-up electric heaters are normally required to provide a top-up and therefore pushing up the energy bills, unless the predicted SHD is very low similar to that of Passivhaus standard.
- The design proposal of the original planning scheme should have been fully coordinated to ensure the ASHPs have been integrated carefully. Have applicant explored to locate the ASHPs on roof level?

Conclusion:

Further information is required so we therefore **do not recommend** discharging Condition 10. The applicant should provide a response to the points raised above and issue updated plans/information where required.

Carbon Management Response 16/04/2026

Documents submitted:

- Energy Report v3 prepared by Environmental-economics (dated 13 Apr 26)
- 2026.03.30 N1058X-4E1F4381_M_02219
- Email correspondences from the applicant

Response

Applicant has revised their energy calculations and carbon reductions as follows:

Current revised proposal – Part L 2013 (SAP 2012)

Part L 2013 (SAP2012)	Residential			Commercial		
	Total regulated emissions	CO ₂ savings (Tonnes CO ₂ / year)	Percentage savings (%)	Total regulated emissions	CO ₂ savings	Percentage savings (%)

	(Tonnes CO ₂ / year)			(Tonnes CO ₂ / year)	(Tonnes CO ₂ / year)	
Baseline	18.6			5.7		
Be Lean	12.4	6.2	33%	4.4	1.3	23%
Be Clean	12.4	0	0%	4.4	0.0	0%
Be Green	4.3	8.1	43%	3.7	0.7	13%
Cumulative savings	-	14.2	77%	-	2.0	36%
Carbon shortfall to offset (tCO₂)	4.3			3.7		

<i>Site-wide (Part L 2013 SAP2012)</i>			
	Total regulated emissions (Tonnes CO ₂ / year)	CO ₂ savings (Tonnes CO ₂ / year)	Percentage savings (%)
Part L 2013 baseline	24.3		
Be Lean	16.8	7.4	31%
Be Clean	16.8	0.0	0%
Be Green	8.0	8.8	36%
Cumulative savings		16.3	67%
Carbon shortfall to offset (tCO₂)	8.0		
Carbon offset contribution	£95 x 30 years x 8.0 tCO ₂ /year = £22,800		
10% management fee	10%		

Be Lean

Applicant has revised their proposed building specifications:

	Consented scheme	Current proposal
Floor u-value	0.11 W/m ² K	0.11 W/m ² K
External wall u-value	0.12 W/m ² K	0.13 W/m ² K
Roof u-value	0.12 W/m ² K	0.08-11 W/m ² K
Door u-value	0.9 W/m ² K	1.80 W/m ² K
Window u-value	1.1 W/m ² K	1.0 W/m ² K

Be Green

Applicant has confirmed the specified EAHP system can meet 100% space heating and hot water demand of the residential units. They have explained due to lack of available roof space to accommodate the ASHP and they have prioritised the roof space for PV installation in order to match that of the consented proposal, as such they have replaced the ASHP of the consented scheme with EAHP.

Conclusion:

The current estimated carbon reduction of the commercial units is only 36%, it falls short of the required minimum 58% as stated in the planning condition. And lack of roof space also cannot sufficiently justify the replacement of ASHP with EAHP.

It is regrettable that the applicant has only applied to discharge this pre-commencement planning condition after the development has been built and occupied. This missed the opportunity to review and revise the design specifications to fully meet the requirements of the planning conditions.

The carbon reduction of the residential units is 77%, this meets the planning condition. And the revised building specifications are similar to that the consented scheme.

On balance, the submitted information is acceptable and we can recommend that Condition 10 is discharged.