

Town and Country Act 1990 (As amended)		Our ref: HGY/2024/3115 Contact: Kwaku Bossman-Gyamera Date: 05/03/2025
Location:	12 Canning Crescent, Wood Green, London, N22 5SR	
Proposal:	Demolishment of existing dwelling and redevelopment of the site to provide 9 self contained flats. (Amendments to the approved application (HGY/2023/1337).	

Carbon Management Response 05/03/2025

In preparing this consultation response, we have reviewed:

- Energy Statement prepared by BaseEnergy (dated December 2024)
- Relevant supporting documents.

1. Summary

The development achieves a reduction of 83% carbon dioxide emissions on site (8tCO₂) from a Building Regulations Part L 2021 compliant building. This is supported in principle. Some clarifications must be provided with regard to the Energy Strategy and Biodiversity net gain strategy. This should be addressed prior to the determination of the application or should be addressed through planning conditions.

A carbon offset contribution of £4,560 is requested to offset the shortfall in emissions that could not be delivered on site. This is calculated at £95 per tCO₂ over 30 years.

2. Energy – Overall

Local Plan Policy SP4 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. London Plan Policy SI4 requires developments to minimise adverse impacts on the urban heat island, reduce the potential for overheating and reduce reliance on air conditioning systems.

<i>Residential / Non-residential</i>			
	Total regulated emissions (Tonnes CO ₂ / year)	CO ₂ savings (Tonnes CO ₂ / year)	Percentage savings (%)
Part L 2021 baseline	9.6		
Be Lean	8.5	1.1	11%
Be Clean	8.5	0.0	0%
Be Green	1.6	6.9	72%
Cumulative savings		8.0	83%
Carbon shortfall to offset (tCO ₂)	1.6		
Carbon offset contribution	£95 x 30 years x 1.6 tCO ₂ /year = £4,560		

Energy – Lean

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

External wall u-value	0.17 W/m ² K
Floor u-value	0.11 W/m ² K
Roof u-value	0.11 W/m ² K
Window u-value	1.20 W/m ² K
Door u-value	1.20 W/m ² K
G-value	0.40
Air permeability rate	4 m ³ /hm ² @ 50Pa
Ventilation strategy	Natural ventilation with continuous extract fans

Heating system Be Lean only	Individual gas boiler (89.5% efficient)
Energy Use Intensity	N/A
Space heating demand	N/A

Energy – Clean

The applicant is not proposing any Be Clean measures. A Combined Heat and Power (CHP) plant would not be appropriate, and it is not close enough to a proposed Decentralised Energy Network.

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 following renewable technologies are proposed:

Proposed Renewable technologies	Type	Specification
Main space heating system and DHW system	Air source heat pump	Individual Air to-water heat pump
Solar PV residential	Peak output	10.8 kWp
	Orientation and angle	Horizontal

Energy Strategy Actions:

Baseline:

- Please submit the GLA's Carbon Emission Reporting Spreadsheet.
- Please submit SAP sheets for a representative selection of dwellings/the development for the Be Lean scenarios.

EUI:

- The submitted Energy Use Intensity / Space Heating Demand is very high. Please demonstrate how you will reduce that in line with the GLA benchmarks, i.e. at 35kWh/m²/year (EUI) and 15 kWh/m²/year (space heating demand)? Please submit the information in line with the GLA's reporting template.

Be Lean:

- Explain (in writing) how the principles of the cooling hierarchy have been followed in line with London Plan Policy SI4 , and specify which overheating mitigation measures are proposed to reduce the overheating risk within the proposed design:
 - o Internal heat generation, i.e. heat distribution infrastructure
 - o Heat entering building, i.e. shutters, trees, vegetation, blinds
 - o Manage heat through thermal mass and high ceilings
 - o Passive ventilation, i.e. openable windows, shallow floorplates, dual aspect, stack effect
 - o Mechanical ventilation, i.e. free cooling from outside air in shade, by-pass for summer mode

3. Overall Sustainability

Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout and construction techniques.

The applicant is proposing a biodiversity net gain of 2.96% which is below the 10% requirement. The BNG assessment proposes to achieve the 10% net gain by offsite purchase of biodiversity gain credits. However, off-site measures are only recommended if BNG cannot be achieved on-site. It is recommended to explore on-site measures like biodiverse living roofs. A biodiversity net gain plan has been conditioned to secure this.

Action:

- Set out what urban greening and biodiversity enhancement measures will be proposed (e.g. green infrastructure, bird boxes, bat boxes etc to connect to the green spaces around the site, living roofs, living walls, etc.)
- It is recommended to explore biodiversity enhancement measures on-site (for eg: living roofs).

- Set out how any demolition materials can be reused.

4. Securing Benefits

Planning Obligations Heads of Terms

- Payment of carbon offset contribution prior to the above ground construction works at £4,560, 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 Statement prepared by BaseEnergy (dated December 2024) delivering a minimum 83% improvement on carbon emissions over 2021 Building Regulations Part L, with high fabric efficiencies, air source heat pumps (ASHPs) and a minimum 10.8kWp 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 11% 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;*
- *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*



HGY-2024-3397
Container Yard, 39 N

- *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. Details and specification of the mitigation measures shall be provided in support of this statement.

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.

Water butts

No dwelling shall be occupied until details of the location of a water butt of at least 120L internal capacity to be installed to intercept rainwater draining from the roof of each dwelling has been submitted to and approved in writing by the Local Planning Authority and subsequently provided at each dwelling. The approved facilities shall be retained.

Reason: To reduce the risk of flooding and demand for water, increase the level of sustainability of the development and in line with Haringey Local Plan Policy SP5, DM21, DM24 and DM25.

Biodiversity

(a) Prior to the commencement of development, a Biodiversity Gain Plan shall be submitted to and approved in writing by the Local Planning Authority. This shall include the details of ecological enhancement measures and ecological protection measures, plans showing the proposed location of ecological enhancement measures, a sensitive lighting scheme, justification for the location and type of enhancement measures by a qualified ecologist, and how the development will support and protect local wildlife and natural habitats. The plan should demonstrate how biodiversity enhancement has been maximised on-site. A biodiversity net gain of 10% must be achieved on-site or off-site.

Development shall accord with the details as approved and retained for the lifetime of the development.

Reason: To ensure that the development provides the maximum provision towards the creation of habitats for biodiversity and the mitigation and adaptation of climate change. In accordance with London Plan (2021) Policies G1, G5, G6, S11 and S12 and Local Plan (2017) Policies SP4, SP5, SP11 and SP13.