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31 March 2026

Dear Sir/Madam,

**Re: City Property Association representation to the Heat Network Supply Zones - Draft Planning Advice Note**

I am writing on behalf of the City Property Association (“CPA”) to respond to the consultation on the draft Planning Advice Note on Heat Network Supply Zones in the Thames Policy Area (“the PAN”). The CPA is the membership body for the owners, investors, professional advisors and developers of real estate in the City of London. A link to our 162 member companies can be found [here](#).

We support the City of London Corporation’s ambition to achieve a net zero Square Mile by 2040. Indeed, our members are at the forefront of delivering market-leading, best-in-class sustainable buildings and are helping to support the City’s future climate resilience and maintain its position as a global city.

We are supportive in principle of expanding heat network supply zones within the City of London to utilise low-cost, low-carbon heat for buildings. We also support the principle of short-term opportunities via thermal barges, alongside longer-term access via strategic heat mains. Such proposals have the potential to help further decarbonise the built environment and support more sustainable development, which aligns with the aspirations of our members.

However, we have some concerns that we believe would benefit from further discussion and clarification. In particular, further assessment would be helpful on the balance between heat supply and demand across the City. This includes greater clarity on the projected heating demand of the City’s commercial office stock by 2040, the quantum of waste heat likely to be generated, and the extent to which such heat could be effectively utilised within a network. Given that office heating demand typically occurs over relatively short peak periods during the coldest weeks in winter, it would be helpful to understand how surplus heat within the network would be managed outside of these periods.

More broadly, it would be helpful for any proposals for heat networks to better reflect that the major energy demand for commercial office buildings in the City is typically cooling rather than heat. Any approach to expanding heat network supply zones should therefore be carefully

aligned with the operational energy profiles of buildings, to ensure that proposed solutions are effective, proportionate and deliver tangible carbon reductions in practice. We would therefore appreciate further discussions on whether a cooling network is being planned or considered alongside the proposed approach to heat networks.

It would also be helpful to understand how the proposed expansion of heat network infrastructure fits within the wider approach to decarbonising the City's existing building stock, and how this compares, in cost and carbon terms, with other measures such as building fabric retrofits, building services upgrades and electrification.

Additionally, we consider that the potential cumulative impacts of delivering heat network infrastructure across the City warrant careful assessment. The Square Mile already faces significant constraints on its streets and public realm, and the excavation and installation of strategic heat mains could result in prolonged disruption. This is particularly relevant as the City Corporation seeks to enhance the public realm and deliver wider placemaking ambitions, including through the Destination City growth strategy. It is therefore important to coordinate heat network delivery with these objectives and minimise impacts on the functioning and quality of the City's streets and spaces as far as possible.

We also have the following comments on the PAN, which we would welcome the opportunity to discuss with officers:

1. **Feasibility of thermal barges:** Further clarity would be helpful on the feasibility of thermal barges, including how reliable this approach is expected to be as a heat source.
2. **Viability of thermal barges:** Greater detail would be welcomed on the likely costs associated with the use of thermal barges, including the cost of any upgrades required to existing heat infrastructure. It will be important to ensure that funding for such a scheme is delivered through existing City Corporation funding or Community Infrastructure Levy (CIL) receipts, rather than through additional S106 contributions sought from new development in the Thames Policy Area, which is already more policy constrained than other parts of the Square Mile. Any additional scheme contributions should be carefully considered and tested to ensure they do not adversely affect scheme viability and deliverability.
3. **Planning implications:** The PAN would benefit from setting out more clearly the planning policy considerations associated with sites identified as potential mooring locations for thermal barges, including the extent and boundaries of such sites. Care should be taken to ensure that development proposals in these locations are not unnecessarily constrained by safeguarding or other planning considerations related to future moorings and associated infrastructure. Providing clearer guidance on how development can come forward alongside the identification of potential mooring sites would help to give greater certainty to applicants and decisionmakers. In this context, the CPA considers that Walbrook Wharf and adjacent sites offer the greatest

opportunity to support the objectives of the PAN, given that it is an operational wharf owned and operated by the City Corporation.

The PAN would also benefit from setting out high-level guidance on the potential location(s) and planning implications of strategic heat mains, to help inform development decisions and to clarify whether provision is intended from a single site or from multiple sites to support network resilience.

Given the scale, complexity and likely long-term nature of heat network delivery, the CPA considers that ongoing engagement with stakeholders will be essential as proposals are developed. This will help to ensure that the approach taken is both practical and viable, and that it supports the City's continued economic competitiveness alongside its net zero ambitions.

We would therefore welcome further engagement and discussion on the preparation of the PAN with officers. If you have any questions in the meantime, please do not hesitate to contact me.

Yours faithfully,



**Charles Begley**

Chief Executive

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