

Mr Sean Mills comments

Page: [Policy SI2 Minimising greenhouse gas emissions](#)

Section: [9.2.6](#)

9.2.6 states that "achieving energy credits as part of a Building Research Establishment Environmental Assessment Method (BREEAM) rating can help demonstrate that energy efficiency targets have been met."

The GLA has set out its own methodology for calculating carbon emissions from new and existing buildings. This can be viewed in "ENERGY PLANNING - Greater London Authority guidance on preparing energy assessments (March 2016)".

BREEAM offers several different methodologies for calculating carbon emissions and reduction depending on the scheme type and building type. None offer a direct comparison to the GLA method, as each use different units and starting points for 'baseline' emissions.

Therefore it cannot be said that BREEAM can be used to help demonstrate compliance with the GLA's energy efficiency targets. Only an Energy Statement which follows guidance in the above GLA document is currently suitable for this purpose.