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**From:** Simon Sturgis [REDACTED]  
**Sent:** 02 March 2018 16:32  
**To:** Londonplan  
**Subject:** London Plan Policy SI 2

**Follow Up Flag:** Follow up  
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Policy SI 2 should include as Item D:

“Referable schemes should undertake Life cycle carbon assessments in line with a nationally recognised whole Life carbon assessment methodology.”

This is because:

1. The majority of a new buildings lifetime carbon emissions are embodied emissions from the sourcing, use, maintenance and replacement of building materials and systems. Whole Life carbon assessment looks at all building related emissions and not just those from day to day energy usage.
2. The RICS, RIBA, UKGBC, and the BRE, have all published guidance on whole Life carbon. The RICS Guidance is in the form of a Professional Statement explaining a detailed methodology for whole life assessments. It will be both mandatory and regulated by the RICS. BREEAM 2018 will include in Mat 01 embodied and life cycle requirements for reducing carbon emissions. There is therefore authoritative and detailed methodology (RICS) and standards (BREEAM) that can be applied to all new construction.
3. Embodied carbon reductions are typically cost neutral, and are therefore not a burden on project costs.
4. This is a great opportunity for London to be at the leading edge of carbon emissions reduction, and thus an exemplar global city.
5. Failure to include the above within Policy SI 2 will mean:
  - A) The London Plan is out of step with current standards for achieving maximum carbon emissions reductions.
  - B) The London Plan has not included the most cost effective route to a low carbon built environment.
  - C) The London Plan has not optimised the potential for carbon emissions reductions as agreed at COP 21 (Paris 2015).

Best regards

**Simon Sturgis** AADip ARB RIBA

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