

20 March 2009

Ms. Mary Edmead
Climate Change and Sustainable Development Team
Department of Communities and Local Government
Eland House, 4th Floor
Bressenden Place
London SW1E 5DU

Dear Ms. Edmead

BCSC welcomes the opportunity to respond to the Government Consultation entitled "Definition of Zero Carbon Homes and Non-Domestic Buildings."

BCSC's mission is to promote best practice in the development and management of the retail environment and to foster a professional, socially responsible and progressive retail property industry. One of our primary aims, as embedded in BCSC's Sustainability Charter, is to significantly reduce carbon emissions from buildings in the retail property sector.

BCSC supports the Government's objectives for carbon reductions from non-domestic buildings and believes that design, energy efficiency and low carbon technologies ought to be employed in our shopping centres. We support the intention of Government to make all buildings as low carbon as possible and applaud the adoption of a hierarchy of allowable solutions that encourages flexibility and cost-effective solutions to zero carbon objectives.

BCSC believes, nonetheless, that Government must be mindful that there are many differences between homes and non-domestic buildings and that zero carbon building regulation must appreciate these differences. We urge a graduated, flexible approach in implementing a zero carbon standard - one that treats carbon reductions comprehensively and expands the definition of zero carbon beyond the single building or asset to the wider community or scheme. We also note that many non-domestic buildings are subject to existing regulation that residences do not face and that these regulations (CCL and CCR, for example) are the best methods for handling unregulated emissions.

We agree with Government that some buildings - shopping centres among them - may face an undue burden reaching zero carbon reductions if a uniform standard is adopted. Shopping centres are often the hub of low carbon energy communities in current mixed-use schemes. Indeed, shopping centres fortified with low carbon CHP technologies are often the most effective way for homes in a mixed-use scheme to meet their low carbon objectives. The message is clear: carbon reduction decisions must be examined holistically, recognising that non-domestic buildings can achieve goals with other types of buildings that would not be possible if the different assets were acting as (and treated as) different and separate entities.

We endorse the Government's objectives and believe that the provisions of the Consultation represent an important leap in thinking about meeting Government's low carbon commitments. We look forward to the Government's further work in reducing carbon from non-domestic buildings and to the upcoming Consultation dedicated to that subject.

Yours sincerely,



Chief Executive, BCSC