



Edward Cooke
1 Queen Anne's Gate
Westminster
London
SW1H 9BT

020 7227 4481
edward.cooke@bcsc.org.uk

Susan Tipping
Communities and Local Government
Planning and Resources Department
Zone 1/B1
Eland House
Bressenden Place
London
SW1E 5DU

1 June 2010

Dear Susan,

BCSC response to CLG Consultation on Planning for a Low Carbon Future in a Changing Climate

BCSC welcomes the Government Consultation *Planning for a Low Carbon Future in a Changing Climate*.

BCSC represents businesses operating in the retail property sector. Our mission is to promote industry best practice and advance the professional aims of the retail property industry. Our membership is a broad church of nearly 3,000 property professionals including owners, developers, retailers, surveyors, architects and public sector managers. 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.

We are committed to working with our members' to achieve the UK and the EU's objectives for significant energy efficiency improvements in buildings and believe that good design, and low carbon technologies should be employed in the UK's shopping centres.

We broadly support the streamlining on the PPS1 supplement and PPS22, and welcome the Government's intention to simplify the planning system more broadly.

Given the recent election and the arrival of a new Government with a new set of policy objectives, we have chosen to outline our broad recommendations in relation to planning for a low carbon future. We hope that this can help to inform and frame any future policy developments as determined by the new Ministerial teams.

In re-aligning planning policy to enable the non-domestic sector to meet its sustainability obligations, it is paramount that the right frameworks are developed which are sector focused, flexible and not bound by a 'one size fits all' approach.

We continue to support the use of Building Regulations as the mechanism to deliver sustainability advances, and urge Government to resist handing more powers in this area to the planning system.

The introduction of policies designed similar to that of the Merton Rule do not deliver the required flexibility to work towards meeting the 2010 or 2019 targets. It is crucial that each development is assessed on its own merit, and local authority-wide (often arbitrary) sustainability targets have not been shown to deliver the best results.

The Merton Rule is clearly popular with local authorities and is seen to be quick win to deliver energy reductions and improve a council's reputation in this area. However, the rule is restrictive in its application, and in certain circumstances introduces an element of risk in enabling developments to move forward.

A move towards such policies could serve to complicate matters and create further regional inconsistencies between different local authorities. This, we feel, could undermine the power of larger landlords and developers to make strategic decisions relating to the sustainability of more than one shopping centre at any one time, thus reducing economies of scale.

We would therefore urge Government to provide national guidance to local authorities, rather than encourage each authority to devise its own sustainability planning policies.

We recognise that there are many ways in which shopping centres can reduce their carbon emissions, via both behavioural and technological changes, and as an organisation BCSC is committed to relaying best practice in both of these areas between developers, landlords and retailers.

Shopping centres are often the hub of low carbon communities in mixed-use schemes. Indeed, shopping centres fortified with low carbon CHP technologies are often the most effective way for domestic dwellings in a mixed-use scheme to meet their own low carbon objectives. Given this position we are strongly in favour of the policy (LCF 4) to encourage local authorities to "design policies to support and not unreasonably restrict renewable low carbon energy developments"

BCSC remains committed to seeing that carbon reduction decisions are taken in context, recognising that non-domestic buildings can achieve significant emissions saving goals in conjunction with other types of buildings. Such savings cannot always be guaranteed when the different assets are acting as (and treated as) separate entities.

With regard to the upgrade of existing buildings, we accept that all shopping centres will be refurbished at some point during their operational lifetime and that this offers an opportunity for cost effective introduction of carbon saving technologies.



We look forward to working with the newly elected UK Government in its further work towards improving the energy performance of buildings and to streamlining the planning system.

If you would like to receive any further information at this time, please feel free to contact me.

Yours sincerely,

Edward Cooke
Executive Director
BCSC