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Energy Bill – Display Energy Certificates

BCSC represents businesses operating in the retail property sector. Our mission is to promote industry best practice. Our membership is a broad church of nearly 2,600 property professionals drawn from 500 companies, including property owners, developers, retailers, surveyors, architects and public sector managers. We know that the UK is home to 820 shopping centres with 13,000,000m² of lettable area in the UK, with some 500,000 car spaces. With this kind of property footprint, our industry cannot shy away from its responsibilities.

Recognising this, we are committed to working with our members' to achieve EU and UK Government objectives for significant energy efficiency improvements in buildings. Against this backdrop, we have been pleased to follow the progression of the Energy Bill, which, as you will be aware, has now completed its Bill Committee stage.

You may be aware that ahead of the Bill Committee Stage of the Energy Bill, BCSC, alongside 70 other organisations, backed a UKGBC and BPF position paper calling on **Government to use the Energy Bill as the legislative vehicle to roll out Display Energy Certificates to Commercial Property. We would like to reiterate our support of this position today, and urge Government to revisit this matter at Report Stage.**

We appreciate that BIS' responsibility is to ensure that any legislation coming from Government does not add unnecessary burdens on business. However, in this instance, we urge Government to heed the calls of the 70 businesses represented on the UKGBC and BPF position paper, noting that we all support a move to roll out mandatory DEC's to commercial property.

To put this in a BCSC context; we have consulted our membership and found that the predominant view is that EPC's appear to have no effect on the decision making process either in the selection or fitting out of retail properties. We also do not believe that EPC's have had any impact on changing behaviour of occupiers in use. This is due to the fact that they are not reflective of the unit in operation and are only ever triggered by a new transaction on the property which is then typically followed by a strip out and refit.

We are firmly of the belief that if the intention of energy assessment of buildings is to change the behaviour of the building occupiers (and thereby reduce emissions) then a requirement to display a form of DEC showing true annual usage data is the only way forward.

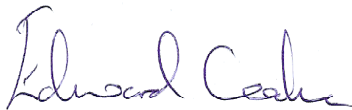
We would also strongly support the publication of the list of DEC's for public buildings. The publicity that this could generate would focus the minds of the public on the sustainability of buildings both domestic and commercial, and this may in turn help to change occupational behaviours at home and work.

We are keen to work with Government on the development of commercial DEC's, in particular to ensure that different users' energy requirements are taken into account in the methodology applied to producing the DEC rating. For example, a retailer that requires large numbers of refrigeration units should not be compared to a fashion retailer that does not have the same requirement. We have been working with officials at CLG on this.

We accept that there would be little value in introducing compulsory DEC's without ensuring that the data within them is kept sufficiently up-to-date. With this in mind, we are broadly supportive of an annual update requirement. However, we do feel that it would be crucial that a framework is put in place for quick and easy production of an annual DEC update without having to rely on a small number of assessors. We would therefore welcome a Government commitment to explore the option of a self assessment portal. This could allow a pre-registered occupier to input consumption data and produce an up-to-date DEC in each of the intervening years between full assessment and the advisory report publication at seven years.

Please do not hesitate to contact me should you wish to discuss any of these matters in more detail.

Yours sincerely,



Edward Cooke
Executive Director
BCSC