



# BNP PARIBAS REAL ESTATE

## PRIVATE AND CONFIDENTIAL

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Your ref:  
Our ref: JC L060511 jbb

9 May 2011

Dear Yvonne

Please find below our representations submitted on behalf of Shell International Petroleum Co Ltd.

### **Document 12.70: The Regional Centre and Inner Areas Boundaries**

Shell have no comments to make in relation to this document.

### **Document 12.71: Policy L5 – Climate Change**

On a general note, we are of the opinion that specific emission reduction targets or Climate Change related planning obligation requirements should be included within a separate SPD. The role of the Climate Change Policy within the Core Strategy should be limited to establishing an overall vision and make a presumption in favour of developments that make significant contributions towards climate change objectives. A separate Climate Change SPD would then establish realistic targets based upon an up to date credible evidence base, which can be updated on a regular basis as economic conditions, Building Regulation requirements and technology evolve over time.

More specifically, our comments are as follows.

The 40% CO2 emission reduction target on top of the Part L Building Regulations 2006 set out in Table 5.1 seems onerous and the fact that the government designated Greater Manchester as a Low Carbon Economic Area for the Built Environment should not be the overriding reason for this threshold to be upheld. We do accept that the viability sections provide an opportunity for this threshold to be flexible, however our opinion is that a more realistic threshold should be established from the outset to reduce the number of challenges on viability grounds. This would help make future monitoring of carbon reduction targets easier and more predictable.

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It is stated that the Trafford Low Carbon Study (2011) has assumed a developer's return of at least 15% for a scheme to be viable. Whilst there are understandably many interpretations of what an acceptable level of return is, in a buoyant economy a generally accepted rule of thumb is 15-20% and viability arguments currently being debated at appeal are suggesting that 20-25% is a reasonable level. The 15% assumption therefore seems ambitious and will further encourage developers to pursue a lower carbon reduction target on viability grounds, which would appear to be a waste of time and resources all round.

**Document 12.72: The proposed inclusion of the Unitary Development Plan High Amenity Strategic Development Site, at Davenport Green, within the Green Belt**

Shell have no comments to make in relation to this document.

Kind Regards

Yours sincerely

A handwritten signature in black ink, appearing to read 'Justin Cove', with a checkmark to the left.

**Justin Cove  
Senior Planner**