

# MANCHESTER CLIMATE CHANGE AGENCY

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Greater Manchester Combined Authority  
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18<sup>th</sup> March 2019

Dear GMCA

## **RE: Greater Manchester Spatial Framework – Manchester Climate Change Agency Response**

Manchester Climate Change Agency (MCCA) welcomes the opportunity to contribute towards the development of the Greater Manchester Spatial Framework (GMSF). It is clear that significant progress has been made since the previous consultation in 2016/17, including in relation to some of the climate change related issues that MCCA raised in our response to the consultation in January 2017, as enclosed.

However, whilst good progress has been made this response seeks to raise two issues that MCCA believes are not yet adequately addressed in this latest draft and which we believe are fundamental to the success of Greater Manchester over the coming 20 years, and beyond:

1. Meeting our carbon commitments (Question 29)
2. Supporting long-term economic growth and grasping the economic opportunities from the global transition to a low carbon economy (Question 36)

### **1. Meeting our Carbon Commitments (Question 29)**

*Do you agree with the proposed policy on Carbon and Energy?*

Response: neither agree or disagree

MCCA welcomes the various high-level interventions outlined in Section 5.5 to 5.15 of the draft GMSF as being part of the strategy that Greater Manchester needs to implement to stay within a science-based carbon budget. However, this latest draft GMSF does not yet set out clearly enough whether or not the growth and development ambitions planned for the coming 20 years are consistent with GM staying within such a science-based carbon budget.

MCCA believes that further work is needed to understand the carbon implications of the current draft and that this work is required urgently to provide a critical input to the next stage of the GMSF's development.

Only once the GMSF can set out clearly how GM will stay within a science-based carbon budget should it be considered fully fit for purpose.

## **2. Supporting long-term economic growth and grasping the economic opportunities from the global transition to a low carbon economy (Question 36)**

*Do you agree with the proposed policy on supporting long-term economic growth?*

Response: neither agree or disagree

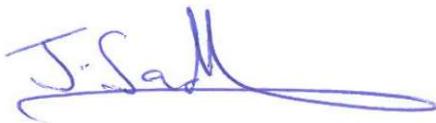
MCCA welcomes the objective for Greater Manchester to 'grasp[] the economic opportunities from the global transition to a low carbon economy'. However, the current draft does not yet articulate sufficiently what these opportunities are, who they pertain to, the potential sources of investment, and how such investment could be mobilised.

In the absence of such detail it is likely to be very difficult for GMCA and its partners to articulate a clear non-carbon based business case for GM to become a carbon neutral city region. And consequently will find it difficult, if not impossible, to mobilise the levels of investment required to stay within a science-based carbon budget.

MCCA believes that further work is urgently required to articulate a non-carbon based business case for Greater Manchester to stay within a science-based carbon budget. And that this information should then be used to engage with potential funders and investors, including UK Government as part of discussions on the next round of Devolution.

Thank you for the opportunity to respond. We look forward to the outcome of this current consultation.

Yours sincerely



Jonny Sadler  
Programme Director  
Manchester Climate Change Agency

Enclosed:

Appendix 1 – MCCA Response to GMSF Consultation January 2017

Check out Manchester's plans to stay with our 15 million tonne carbon budget for 2018-2100 and become a zero carbon city by 2038 at [www.manchesterclimate.com/plan](http://www.manchesterclimate.com/plan) and [@McrClimate](https://twitter.com/McrClimate)

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16<sup>th</sup> January 2017

Dear Greater Manchester Combined Authority

**Draft Greater Manchester Spatial Framework Consultation – Manchester Climate Change Agency Response**

**1. Introduction**

Manchester Climate Change Agency (MCCA) welcomes the publication of the draft Greater Manchester Spatial Framework and the opportunity to provide comments. The Framework provides a critically important opportunity, at a time of great global uncertainty, to set out a clear vision and path for Greater Manchester's growth and development to 2035, ensuring that the city-region has a clear place in the world and provides a platform for ongoing success beyond 2035. The right Framework, successfully implemented, will enable Greater Manchester (GM) to realise its potential to provide an attractive location for citizens and investors seeking a high quality of life, with rewarding education and employment opportunities, and make a meaningful contribution to addressing UK and global social, economic and environmental priorities.

MCCA's mission is to enable all city stakeholders to actively participate in the development and implementation of the city's policies on climate change. In 2016 the Agency facilitated the development of Manchester's Climate Change Strategy for 2017-50, basing it on the views stakeholders expressed during the development of the Manchester Strategy in Autumn 2015, and those expressed during the public consultation on the climate change strategy in July-October 2016.

The comments in this response are consistent with the Manchester Climate Change Strategy 2017-50. As such they are intended to represent the views of Manchester stakeholders. The Strategy 2017-50 and Implementation Plan 2017-22 are available from [www.manchesterclimate.com/plan](http://www.manchesterclimate.com/plan)

Comments on the draft Greater Manchester Spatial Framework are set out below.

## 2. Vision and Strategy

### 2.1 SMART Objectives

This section contains a number of elements that are welcomed and of critical importance in ensuring Greater Manchester's long-term success. However, it is not clear which elements of this section are (aspirational) narrative and which are specific objectives. To ensure long-term success the GMSF needs to define as clearly as possible what we are collectively aiming to achieve.

*Recommendation:* set out a clear set of SMART objectives, against which progress can be measured. It is likely that some of these objectives will already be defined in existing Greater Manchester policy documents, including the Greater Manchester Strategy. However, we need to ensure that we realise the opportunity to adopt the most up-to-date objectives, and not just copy objectives that may now be out of date following their adoption in previous years. The UN Sustainable Development Goals could be used as a helpful starting point: <http://www.un.org/sustainabledevelopment/sustainable-development-goals/>

It is also proposed that specific objectives be included for:

- CO<sub>2</sub> reduction (see below)
- Adaptation and resilience to climate change
- Low carbon economy

*Rationale:* to provide clarity on what Greater Manchester and stakeholders are collectively aiming to achieve, and a framework against which specific policies can be developed, and progress measured.

### 2.2 CO<sub>2</sub> Reduction Objective and Target

We believe that GM's future success is intrinsically linked with that of the global economy and environment. On that basis we welcome the inclusion of a specific GM target for CO<sub>2</sub> reduction; proposed in the draft as a 65% reduction by 2035, from 1990 levels. However, we believe that this target fails to take account of the latest international climate science and policy, specifically the Paris Agreement and subsequent developments through the implementation to date of the Paris Agreement Work Programme. It should be noted that the UK Climate Change Act and associated UK policy framework is yet to be updated in line with the Paris Agreement, and as such is deemed by a growing number of experts to be insufficient to ensure the UK makes its full contribution to the successful delivery of the Paris Agreement. As such, GM's CO<sub>2</sub> reduction target should be aligned with the Paris Agreement and the latest associated developments, rather than the now out-of-date UK Climate Change Act.

Manchester's Climate Change Strategy for 2017-50 has sought to do this. The strategy's 'zero carbon' objective is:

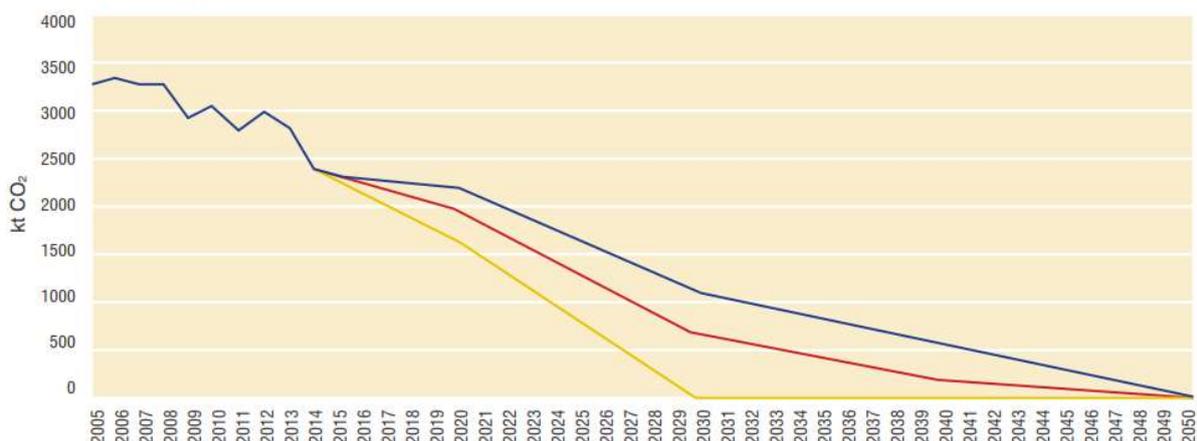
*'Manchester will adopt and stay within a scientifically robust carbon budget that is consistent with the Paris Agreement to limit global average temperature increases to well below 2°C, ultimately resulting in Manchester becoming a zero carbon city by 2050.'*

*Manchester’s carbon budget, pathway and timescales for becoming zero carbon will be kept under ongoing review and be subject to revision, to ensure that the city plays its full role as part of the Paris Agreement.’*

At the time of the strategy’s production it wasn’t possible to set a specific carbon budget and pathway. However, three scenarios were developed as a starting point for more detailed work that will be completed in 2017-18, as part of the delivery of the strategy’s Implementation Plan for 2017-22.

Scenario	Carbon budget (Mt CO <sub>2</sub> )	% CO <sub>2</sub> reduction from 2005			
		2020	2030	2040	2050
Scenario 1 – 50% chance of limiting global average temperature increase to 2°C	37	34%	68%	85%	100%
Scenario 2 – 66% chance of limiting global average temperature increase to 2°C	28	41%	80%	95%	100%
Scenario 3 – 33% chance of limiting global average temperature increase to 1.5°C	17	50%	100%	100%	100%

**Pathways to 2050**



**Recommendation:** the Framework includes the following objective:

*‘Greater Manchester will adopt and stay within a scientifically robust carbon budget that is consistent with the Paris Agreement to limit global average temperature increases to well below 2°C, ultimately resulting in Greater Manchester becoming a zero carbon city-region by 2050.*

*Greater Manchester’s carbon budget, pathway and timescales for becoming zero carbon will be kept under ongoing review and be subject to revision, to ensure that the city-region plays its full role as part of the Paris Agreement.’*

**Rationale:** to ensure that GM makes its full contribution to the successful delivery of the Paris Agreement and realises the social and economic benefits of acting. This is the approach being taken by other global cities that have placed ambitious action on climate change at the heart of their plans for growth and which are now being rewarded with enhanced investment, population growth and reputational benefits. The Deadline

2020 report by C40 and Arup, for example, sets out the scale of the opportunity and challenge for cities, in the context of this Paris Agreement [http://www.c40.org/other/deadline\\_2020](http://www.c40.org/other/deadline_2020). This approach is also consistent with the statement in section 2.0.1 that ‘...*combating climate change will be as important as delivering high levels of new development.*’

### **2.3 Growth – inclusive, zero carbon, climate resilient growth**

We welcome the aspiration for a differentiated form of ‘growth’ than that typically set out in city development strategies, namely ‘inclusive growth’. We believe that this will be an important element of GM’s success over the coming decades. However, in order to further increase GM’s likelihood and level of success we believe there are other critically important components that need to be embedded as part of GM’s definition of growth, namely: ‘*zero carbon, climate resilient growth*’.

*Recommendation:* that the term ‘growth’ is replaced with the term ‘inclusive, zero carbon, climate resilient growth’.

*Rationale:* to ensure that GM’s stated commitments to ‘*combat[ing] climate change*’ (section 2.0.1) and ‘*cope with the challenges of a changing climate*’ (section 2.0.9) can be achieved as an integral part of GM’s growth and development, ensuring that development brings and attracts added value. As well as being an important part of the narrative in the GMSF, repeated use of the term ‘*inclusive, zero carbon, climate resilient growth*’ will help to ensure that definition becomes increasingly embedded as part of the GM policy framework and known amongst GM’s stakeholders, ensuring that an integrated approach is taken as business-as-usual.

### **3. Strategic Locations**

Throughout the ‘strategic locations’ sections there are commitments to a number of components of successful cities and communities, including, for example: high quality, multi-functional green infrastructure embedded as an integral part of existing and new developments; safe, attractive and well-signposted walking and cycling routes; accessibility through existing and new public transport routes, and others. MCCA welcomes the inclusion of these commitments. However, these key components do not appear fully throughout the commitments for all the strategic locations, thereby missing the opportunity to maximise the success and sustainability of each development. The commitments are also largely open to interpretation, creating the risk that they may not be (fully) delivered or enforceable.

*Recommendation:* That a Supplementary Planning Document for Sustainability and Environmental Performance, or similar document, be developed to set out specific standards and guidance that will support developers to realise the opportunities present on all strategic sites.

*Rationale:* to ensure the optimum scheme is developed for each strategic location.

### **4. Policy GM15 – Carbon Emissions**

To be read in conjunction with the above comments on 'CO<sub>2</sub> Reduction Objective and Target'.

For every additional new development in GM that is not zero carbon, this will increase GM's total CO<sub>2</sub> emissions. Therefore, to increase the number of developments in GM, at the same time as reducing CO<sub>2</sub> emissions we need to move to new developments becoming net zero carbon, as quickly as possible.

The current draft Policy GM15 both fails to recognise this challenge and the opportunity to address it.

**Recommendation:** in consultation with industry and its development partners, GM develops and introduces an enforceable policy and guidance for all new developments to be net zero carbon from the early-2020s, exact date to be determined.

**Rationale:** in order to meet long-term GM CO<sub>2</sub> reduction targets, new developments will not be able to make any net contribution to GM's carbon footprint. This is the view set out in the GM Climate Change Strategy Implementation Plan 2016-50. This approach is also supported by the UK Commission on Climate Change<sup>1</sup>, the Government's independent advisory body on climate change. Globally, the C40, a network of leading cities for action on climate change similarly recognise and are moving towards zero carbon development as soon as possible<sup>2</sup>.

With sufficient lead-time to enable supply chains to be developed, training and capacity building, and through joint-policy development with Government, the UK construction industry has previously demonstrated its ability to meet such targets. This is the experience from the introduction of the Government's Zero Carbon Policy, which set the target for all domestic developments to be zero carbon from 2016, and all non-domestic developments from 2019. Notwithstanding that Government has now scrapped its Zero Carbon Policy, this provides precedent and evidence that the UK construction industry, when provided with sufficient and consistent long-term policy certainty is able to meet the standards that are required.

The Manchester Climate Change Strategy 2017-50 also supports this approach: *'The city's developer partners will continue to have a major role to play over the coming decades, working in partnership with Manchester City Council to bring forward significant levels of housing and commercial development. Properly planned, this scale of development will contribute towards this strategy's objectives, and help to avoid 'locking in' high carbon and climate-vulnerable developments and land use patterns for the long-term.*

*With sufficient density, new public and active transport routes will become viable, renewable energy projects will become commercially and technically viable, and business cases for investing in areas of currently underused and low quality greenspace will be able to come forward. New development served by such infrastructure will become a significant part of the appeal for existing and new domestic and commercial occupants.*

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<sup>1</sup> <https://www.theccc.org.uk/charts-data/ukemissions-by-sector/buildings/>

<sup>2</sup> [http://www.c40.org/other/deadline\\_2020](http://www.c40.org/other/deadline_2020).

*To enable this, Manchester City Council will need to respond to the views expressed during the public consultation on this strategy, and more widely by the UK development industry, by setting clear, long-term standards and land use plans for new developments. Current Government planning policy does not encourage this approach. However, as we are already starting to see in other cities, Manchester will need to be bold in its use of local planning powers, to ensure we make use of it as a tool for delivering the objectives the city believes in. Being able to do this will be a test for the Government and its implementation of devolution policy in practice. A critically important and immediate first step is to ensure that the Greater Manchester Spatial Framework is consistent with the objectives set out in this document. To that end Manchester Climate Change Agency will continue to actively contribute towards the Framework's development.'*

## **5. Policy GM1 – Delivering a Successful Greater Manchester, and Policy GM13 – The Green Belt**

This policy provides the key overarching approach to development in GM. We welcome several components of the policy, namely the focus on development in existing urban areas, a prioritised programme of transport investment, and the need for developments to be accessible by walking and cycling. However, we believe that, to ensure the success of future development it should also include 'zero carbon, climate resilient masterplanning and design' as core components. And that the focus on development should be 100% outside of the green belt, as opposed to the 72% that is currently proposed.

*Recommendation:* include 'zero carbon, climate resilient masterplanning and design' as part of this policy.

*Rationale:* this will ensure that, as with the focus on existing urban areas, and transport, that GM's climate change objectives can be directly supported through GM development activity.

*Recommendation:* no reduction in the Green Belt, with 100% of development planned for unprotected, non-green belt land, with the priority being existing urban areas.

*Rationale:* GM is faced with a number of complex and well-recognised challenges, as a result of ongoing development, population growth, an ageing population, climate change, and other factors. As set out in the GMSF Integrated Assessment October 2016<sup>3</sup>, GM's existing green infrastructure network, which includes the green belt, provides a range of 'ecosystem services' or benefits that make a direct contribution to addressing these challenges, including 'improved air quality', 'recreation opportunities', 'green (active) travel routes', 'tranquillity', 'climate change adaptation', 'flood risk', and 'health improvements'.

Further, the GM Climate Change Strategy Implementation Plan 2016-20 commits that '*By 2020, our natural environment, and the ecosystem services it provides, still need to be both protected and (where possible) enhanced in light of increasing pressures from people, the economy and a changing climate. Our natural capital must also be embedded*

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<sup>3</sup> [https://www.greatermanchester-ca.gov.uk/info/20081/draft\\_plan](https://www.greatermanchester-ca.gov.uk/info/20081/draft_plan)

*into the decision-making for sustainable economic growth investments, enhancing their success and resilience. By 2020 we will seek to achieve no net loss in habitat quality or extent from a 2014 baseline.'*

The proposal to reduce GM's current green belt for development fails to take into account the benefits it provides. The case for development appears to be made simply on the basis of land availability. Given the commitments set out in the 'vision and strategy', elsewhere in the draft GMSF, and in other GM policy documents, the current GMSF green belt proposals appear to be inconsistent with stated GM policy objectives.

## **6. Policy GM6 – Accessibility**

We believe the current draft policy contains a number of areas that are of critical importance to GM's long-term success, in particular the focus on public transport, walking and cycling.

*Recommendation:* in order to maximise the impact of investment in these areas and the likelihood of success, we believe that the GMSF should contain an explicit statement that, wherever possible, investment in public transport, walking and cycling, will be prioritised over investment in roads and private car use.

*Rationale:* in support of the GM Transport Strategy 2040 and GM Climate Change Strategy 2011-20 and their aims for substantial change in GM travel patterns, in support of CO<sub>2</sub> reduction, air quality and health improvement objectives.

We recognise that Manchester Airport has an important part to play in GM's long-term success, as set out in the Manchester Climate Change Strategy 2017-50: *'Manchester Airport will continue to be a major hub for incoming and outgoing movements of people and goods, at the heart of the Northern Powerhouse.'* At present, however, Policy GM6 is potentially inconsistent with the draft GMSF's stated commitment to *'combat[ing] climate change'* and draft Policy GM15 on Carbon Emissions, on the basis that it fails to take into account the CO<sub>2</sub> emissions from aviation. To ensure policy consistency and the adequate level of action we recommend the following.

*Recommendation:* the GMSF recognises the CO<sub>2</sub> emissions from the planes that emanate from Manchester Airport. And that, to ensure consistency with GM objectives for addressing climate change, that the GMSF commits to manage CO<sub>2</sub> emissions as part of an international aviation emissions scheme, to be developed within the framework of the Paris Agreement on climate change. This is the approach set out in Manchester Climate Change Strategy 2017-50: *'Emissions will be managed as part of an international aviation emissions scheme, to be developed within the framework of the Paris Agreement. In the meantime, the city and wider aviation industry will continue to benefit from world-class expertise at Manchester Metropolitan University's Centre for Aviation Transport and the Environment, including through planned work to look at options for preparing Manchester Airport and the city for the introduction of an international agreement on aviation emissions.'*

*Rationale:* CO<sub>2</sub> emissions from aviation present a significant threat to successfully meeting the targets set out in the Paris Agreement. Fully and properly managing these emissions requires an international scheme to be established and implemented, with

the active participation of all Governments, airports and airlines. By beginning to prepare for the introduction of such a scheme now, Manchester Airport can reduce the associated risks and benefit as an early-adopter.

## **7. Policy GM7 – Green Infrastructure**

We welcome this draft policy and would recommend one improvement.

*Recommendation:* include 'micro, small and medium-scale urban GI collectively as one of six 'strategic elements'.

*Rationale:* GI is at its optimal functionality when individual components – micro, small, medium and large – function as part of an integrated, landscape-scale network. As the density and extent of urban areas in GM increases, so will the importance of urban GI, as part of the city-region-wide network.

## **8. Policy GM9 – Trees and Woodland**

We welcome this draft policy and would recommend one improvement.

*Recommendation:* a seventh priority on the management of trees and woodlands for carbon storage/sequestration.

*Rationale:* The GM Climate Change Strategy Implementation Plan 2016-20 has committed GM to set a CO<sub>2</sub> reduction target for post-2020. Assuming that the target is consistent with the latest climate science and policy, it will be challenging and require the delivery of an ambitious and wide-ranging strategy to ensure it is met. It is likely that this strategy will need to include carbon sequestration, in order to offset GM's residual CO<sub>2</sub> emissions. This is the approach set out in the Manchester Climate Change Strategy 2017-50: '*Sequestration of carbon, particularly by trees, will make a direct contribution to Manchester's CO<sub>2</sub> reduction targets*'.

## **9. Policy GM10 – The Uplands**

We welcome this policy and its recognition of the important role of the uplands as part of GM flood risk management and CO<sub>2</sub> reduction strategies.

## **10. Policy GM11 – The Lowland Wetlands**

We welcome this policy and its recognition of the important role of the lowland wetlands as part of GM flood risk management and CO<sub>2</sub> reduction strategies.

## **11. Policy GM13 – The Green Belt**

See above comments in relation to GM1.

## **12. Policy GM16 – Resilience**

We welcome this policy.

## **13. Policy GM18 – Flood Risk and Water Quality**

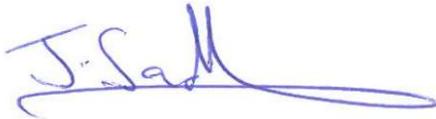
We welcome this policy.

## **14. Policy GM22 – Health**

We welcome the recognition that action on climate change and environmental improvement is a critical component of improving the health of GM citizens.

We look forward to the outcome of the consultation.

Yours sincerely,



Jonny Sadler  
Programme Director  
Manchester Climate Change Agency

Find out about Manchester's action to become a zero carbon city at [www.manchesterclimate.com](http://www.manchesterclimate.com) and [@McrClimate](https://twitter.com/McrClimate)