

# MANCHESTER CLIMATE CHANGE AGENCY

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Dear Manchester City Council

## **RE: Manchester Local Plan Issues Consultation – Manchester Climate Change Agency Response**

Thank you for the opportunity to comment on the development of the Local Plan.

### **Introduction**

Manchester Climate Change Agency aims to ensure that Manchester plays its full part in limiting the impacts of climate change, in line with the aim in the Our Manchester Strategy 2016-25.

In February 2020 the Agency and Manchester Climate Change Partnership published the Manchester Climate Change Framework 2020-25, which set out a proposed high-level strategy for the city to achieve this aim. In March 2020, the Framework was endorsed by Manchester City Council's Executive, on behalf of the city, formally establishing it as the city's climate change strategy for 2020-25.

Our response to the Local Plan draws on the key commitments in the Framework, seeking to ensure the Local Plan is fully aligned and identifying areas where further work is needed. The Framework is available from [www.manchesterclimate.com/framework-2020-25](http://www.manchesterclimate.com/framework-2020-25).

### **Manchester's Opportunity to Lead the World in a New Model of Zero Carbon and Climate Resilient Growth and Development**

The cities that will succeed in the 21<sup>st</sup> century are those that place ambitious action on climate change at the heart of their plans for economic, social and environmental improvement. We see evidence of this from those cities who already recognise that an agenda driven simply by jobs and growth is no longer sufficient – residents, workers, businesses, students and visitors now expect jobs to be good jobs with socially responsible employers, and that any growth will be sustainable, zero carbon, climate resilient and make a net positive contribution to the local and global society and environment.

Manchester is well-placed to champion this new model, to put a distinctly Manchester stamp on it, and provide the kind of leadership and inspiration that is urgently needed to avoid the worst impacts of the rapidly accelerating global climate crisis. And at the same time realising the

health, wellbeing and economic benefits that will come as a result for our residents and businesses.

The Local Plan is a critically important opportunity to make a clear statement of our commitment and approach to this new model. As with other cities, our previous plans have led to increased CO<sub>2</sub> emissions and increased vulnerability to the changing climate. The Local Plan is our opportunity to set out on a boldly different, transformative and inspiring new path.

As the world looks for urgent action on climate change, now is the time for Manchester to do what we always done. To provide inspiration for others to follow, putting us in the running to become one of the first zero carbon, climate resilient cities in the world.

**Q1: Should the new Local Plan continue with the spatial principles as expressed in the current Core Strategy?**

**Density**

We are supportive of the approach in terms of dense urban development that can better facilitate viable public transport routes, walking and cycle-friendly neighbourhoods, and the deployment of renewable energy systems whose viability improves with increased numbers of users in close proximity.

**Manchester Airport**

We recognise that Manchester Airport is currently an important part of Manchester, the wider region and the UK's economy. In order for the Airport to continue to be part of the city's development and economic plans, and as set out in the Manchester Climate Change Framework, we believe that:

'Manchester Airport Group and Manchester City Council [should] work with UK Government to help develop a UK aviation strategy which is in line with the Paris Agreement and the approach used by the Tyndall Centre for calculating carbon budgets', and

'Manchester Airport Group and Manchester City Council [should] work with UK Government and other UK airports to ensure that any proposed development at Manchester Airport is consistent with a Paris Agreement-aligned UK aviation carbon budget, taking into account the 1,200 million tonne carbon budget proposed by the Tyndall Centre, and the city's 15 million tonne carbon budget for direct emissions'.

These activities should be undertaken as part of the next stage of the development of the Local Plan.

See Section 5.1 of the Framework for further information.

**Q2: Are there any alternative spatial principles that should be included? Is so what are they?**

We recommend the addition of one further spatial principle:

'Development will be planned to ensure that its location helps to keep Manchester's direct CO<sub>2</sub> emissions (from buildings and transport) within a limited carbon budget and that all aviation emissions from Manchester Airport are consistent with the Paris Agreement, as part of a UK aviation strategy'.

See Section 5.1 of the Framework for further information.

### Q3: Do you agree or disagree with the draft vision?

We agree with the proposed vision, with one addition:

'Have a climate resilient environment delivering a net zero-carbon pattern of development'

### Q4: Do you agree or disagree with the draft objectives?

#### 2. Proposed Highly Skilled City Objectives

We recommend the following amendment:

'Support low zero-carbon **and climate positive** development in accessible locations that will improve the economic **and CO<sub>2</sub>** performance of the city...'

Proposed amendment:

'...and provide and attract new accessible employment, particularly in the City Centre and around the airport, **recognising the need for any development at the airport to be fully in line with the Paris Agreement**'

#### 3. Proposed Connected City Objectives

Proposed addition:

'Ensure that walking, cycling and public transport become the preferred modes of choice for the majority of journeys'

Proposed amendment:

'Support the growth **establishment** of Manchester Airport as the North of England's principal international gateway, **as part of a UK aviation strategy which is fully in line with the Paris Agreement and the development of UK-Europe rail links**'

#### 5. Proposed Living and Low Carbon City Objectives

Proposed amendment:

'Living and Low Zero Carbon City Objectives'

Proposed amendment:

- ~~addressing the causes and consequences of climate change by reducing carbon emissions to meet the carbon budget of 15million tonnes, promoting green infrastructure, using sustainable natural resources and incorporating resilience within its design and operation.~~
- **'Contribute to ensuring Manchester stays within a carbon budget of 15 million tonnes of direct CO<sub>2</sub> emissions (from building use and transport) and tackling indirect / consumption-based emissions, including those embedded in construction materials.'**
- **'Deliver new and manage existing green infrastructure to ensure it helps adapt the city to the changing climate, ensures our natural environment acts a net carbon sink, and contributes towards the health and wellbeing of Manchester's residents and wildlife.'**

### Q5: Why do you agree or disagree with the vision?

The above comments have been made to ensure consistency with the Manchester Climate Change Framework 2020-25, which was endorsed by Manchester City Council in March 2020.

### Q6: Why do you agree or disagree with the draft objectives?

The above comments have been made to ensure consistency with the Manchester Climate Change Framework 2020-25, which was endorsed by Manchester City Council in March 2020.

**Q7: Do you think that the key issues in each of the main neighbourhood areas have been identified?**

In-part.

**Q8: What additional issues should we consider in your neighbourhood area?**

Proposed addition:

Each area requires further information on the current levels, quality, needs and opportunities in relation to green infrastructure.

Rationale:

To ensure consistency with the Manchester Green and Blue Infrastructure Strategy 2015-25, which contains the aim:

'By 2025, high quality, well maintained green and blue spaces will be an integral part of all neighbourhoods.'

**Q9: What do you think are the main priorities that the Local Plan should focus on to achieve the target of a zero-carbon city by 2038?**

**Zero Carbon 2038 vs Carbon Budgets**

We are pleased to see the clear recognition and commitment for Manchester to become a zero carbon city. However, we are concerned to see that the ambition is framed within the context of a 2038 timescale. Manchester has formally adopted a carbon budget-based approach to its CO<sub>2</sub> targets.

As set out in the Manchester Climate Change Framework the city has formally committed to stay within a limited carbon budget of 15.17 million tonnes CO<sub>2</sub> for the period 2018-2100, for its direct CO<sub>2</sub> emissions (from building use and transport). This budget is broken down into a series of five-year budgets, as below:

<b>Time Period</b>	<b>CO<sub>2</sub> budget (MtCO<sub>2</sub>)</b>
2018-22	6.93
2023-27	3.59
2028-32	1.95
2033-37	1.10
2038-42	0.64
2043-47	0.38
2048-2100	0.59
Total	15.17

The critical parameter is staying within the 15.17 million tonne budget, not a zero carbon end-date. It would be possible for Manchester to become zero carbon by 2038 but to emit more than its committed 15 million tonne budget, thereby failing to meet its stated commitment.

Proposed amendment:

The Local Plan's zero carbon commitments are restated in line with the carbon budget approach, as outlined above. Further information is available in Section 5.1 of the Framework.

## Zero Carbon New Development

The following sets out the Agency's position, as per Section 6.1 of the Framework:

'New buildings

We need to ensure that new developments in the city don't eat into our limited carbon budgets and add to the already significant retrofit challenge. This means that we need them to be built and operated to zero carbon standards as soon as possible.

The ideal way to do this is through UK Government establishing a national zero carbon definition and methodology for its implementation, and for Manchester City Council to implement this standard as quickly as possible through the local planning system.

This should include applying zero carbon standards to all developments where the Council has additional influence, for example as a client / end-user, landowner or development partner, with a view to all new development needing to be zero carbon from 2023 at the latest, when the new Manchester Local Plan is expected to become operational'.

Manchester City Council have endorsed this position as part of the endorsement of the Framework in March 2020. It has further support from members of the Manchester Climate Change Partnership, many of whom have stated the need for consistent zero carbon standards to be introduced and implemented as soon as reasonably possible. Further information is available in the summaries of their climate change action plans, as Appendix 2 to the Framework<sup>1</sup>.

Proposed amendment:

The Local Plan commits to the above position and includes recognition of the work undertaken by the UK Green Building Council, which we believe will be helpful in the detailed development of the zero carbon elements of the Plan.

### **Q10: Are there any other key actions that should be addressed in the Local Plan?**

Proposed addition:

'Ensure that 100% of Manchester's electricity is generated from renewable sources, from a combination of energy generated inside the city, a decarbonised National Grid, and potentially also our own renewable energy generated outside the city'. See Section 6.1 of the Framework for further information.

### **Q11: What specific links do we need to make with other strategies (eg. Clean Air Plan; City Centre Transport Strategy; 2040 Transport Strategy) in terms of policies that should feature in the Local Plan?**

The forthcoming UK Aviation Strategy, provided it is in line with Manchester's position that UK aviation emissions need to stay within 1,200 million tonnes CO<sub>2</sub> during 2020-2100. See Section 5.1 of the Framework for further information.

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<sup>1</sup> <http://www.manchesterclimate.com/sites/default/files/Appendix%20%20-%20MCCP%20Action%20Plans%20Summary.pdf>

## Summary

The Agency recognises that the above proposals represent significant challenges to Manchester and in many areas will require major changes to the city's current approach to and standards for growth and development. However, we believe that now is the time for such changes. Manchester is not currently on track to meet its climate change commitments. Getting on track will require bold, transformative and ambitious changes in policy and behaviours, including those that can be addressed through the Local Plan.

Manchester is not alone in facing this challenge. No city in the world is yet on track to meet targets in line with the Paris Agreement. However, we have already made an important first step through the commitments made in the Manchester Climate Change Framework 2020-25, including those originally set in November 2018 when we became one of the first cities in the world to commit to act in line with the Paris Agreement.

The Local Plan is a critical first test of our resolve and an opportunity to move us into the next stage of our zero carbon journey. At a time when bold climate leadership is desperately needed, we hope that Manchester City Council share our view that now is the time for Manchester and its development partners to step-up, to lead the way, and provide inspiration for others to follow.

Yours sincerely



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Check out Manchester's Climate Change Strategy for 2020-25!

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