

Question No 40 - Sustainable Design and Construction

Do you agree with this policy? Yes (12) In Part (6) No (0)

Yes (LP395-12, LP385-29, LP321-40, LP309-40, LP299-7, LP292-21, LP290-10, LP280-7, LP267-27, LP28-40, LP27-8, LP16-13)

In part (LP315-12, LP305-12, LP300-8, LP272-12, LP266-7, LP261-2)

	Respondents comments	MCC Response	Respondent ID
1	Support	Support noted	LP-385-29 LP-309-40 LP-299-7 LP-290-10 LP-286-40 LP-28-40 LP-27-8 LP-16-13 LP-303-4 LP-291-22 LP-280-7
2	Planning permission should be refused where new developments increase carbon emissions	The development industry is in a transition period towards lower and net zero carbon developments and this is recognised in the policy. Each site will have its own unique scenarios and the sustainability assessments will identify the measures that would need to be taken to meet the requirements of this policy. Developers would need to justify and provide evidence for not meeting these requirements.	LP-349-4

	Respondents comments	MCC Response	Respondent ID
3	Support in part but include flexibility where the standards are impractical to achieve	Change agreed. The policy wording has been amended to provide the consideration on a case-by-case basis and provide consistency with Policy ZC2. "All new developments shall support sustainable development, unless it can be demonstrated that it is not practical or financially viable , through where possible :	LP-305-12
4	Support but no need to qualify policy in terms of viability. This should be included as an expected standard across the plan.	Each site will have its own unique scenarios which may result in costly solutions. The sustainability assessments will identify the measures that would need to be taken to meet the requirements of this policy. Developers would need to justify and provide evidence if this were to be the case for development proposals.	LP-388-10 LP_379-20 LP-308-32
5	Supportive of the ambition of the policy but should be more flexible to take into account viability constraints so as not to inhibit development.	Change agreed. The policy wording has been amended to provide the consideration on a case-by-case basis and provide consistency with Policy ZC2. "All new developments shall support sustainable development, unless it can be demonstrated that it is not practical or financially viable , through where possible :	LP-266-7
6	The introduction of embodied carbon assessment needs to be flexible to ensure that developments are viable and the cost implications are understood.	Change agreed. The policy wording has been amended to provide the consideration on a case-by-case basis and provide consistency with Policy ZC2. "All new developments shall support sustainable development, unless it can be demonstrated that it is not practical or financially viable , through where possible :	LP-306-3 LP-300-8

	Respondents comments	MCC Response	Respondent ID
7	Add additional criteria: e) ensuring that sustainable design and construction requirements are applied, taking into account site-specific viability, abnormal costs, and the overall deliverability of strategic regeneration projects. Innovative solutions and whole-life carbon assessments are encouraged as alternative means of achieving high environmental standards.	The policy wording has been amended to provide the consideration on a case by case basis. “All new developments shall support sustainable development, unless it can be demonstrated that it is not practical or financially viable, through where possible: A separate criterion of this nature is not considered necessary. A Viability assessment has been carried out in relation to all policies within the Local Plan. It would be a matter for the applicant to justify why the policy is not being met as part of the planning submission through the Sustainability assessment and Whole Life Carbon assessments.	LP_272-12
8	Support, particularly in respect of the support for retrofitting and calculating their embedded carbon. More specific demands for demolition justification are required. Developments that incorporate features for biodiversity should be more prominent in the policy. Front gardens should not be hard landscaped. Hedges and not fences should be used at property boundaries in new estates. Hedgehog highways should be included in all new estates. Astro turf should be banned in Manchester.	General support noted. Consideration is being given to the need for additional guidance.	LP-404-13
9	Support but request retrofit standards to help meet the goal, particularly in Castlefield	The Local Plan provides a framework for assessing planning applications. The policy does provide standards for refurbishment works but not all such works will require planning permission.	LP-374-12

	Respondents comments	MCC Response	Respondent ID
10	Request green infrastructure enhancements to existing neighbourhoods, including Castlefields, to absorb pollution, reduce heat impacts, help attenuate surface water and provide wildlife habitats	The Local Plan provides a framework for assessing planning applications and cannot make requirements for existing areas which are not subject to planning permission.	LP-374-12
11	Support retrofit first approach as such measures can improve energy efficiency and provide energy savings. However care does need to be taken in historic buildings and a balance needs to be made to ensure there is no damage to the building or its fabric. Note that some buildings are exempted in Building Regulations Part L from complying with energy efficiency measures if they would unacceptably damage their character or appearance	Comments are noted. New development proposals are assessed against all the policies within the Local Plan and decisions need to balance a number of different considerations, including the impact on historic features.	LP-218-21
12	Support in part but suggest change to include reference to the use of canal water to provide heating and cooling where adjacent to a canal	The policy does not preclude this consideration where appropriate.	LP-315-12
13	Surprising that there is no mention of sustainable drainage and measure needed to adapt to increasing flood risk	Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP-29-17
14	Policies should address water use and efficiency along with reuse and promote use of sustainable drainage systems.	It is proposed to include more detail relating to water efficiency elsewhere in the plan (see Policy EN8). Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP-325-8 LP-386-19
15	Policy should include a tighter water efficiency standard and recommended wording is provided: "All new residential developments must achieve, as a minimum, the optional requirement set through Building Regulations Requirement G2: Water	It is proposed to include more detail relating to water efficiency elsewhere in the plan (see Policy EN8). Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP-386-19

	Respondents comments	MCC Response	Respondent ID
	Efficiency or any future updates. All major non-residential development shall incorporate water efficiency measures so that predicted per capita consumption does not exceed the levels set out in the applicable BREEAM Excellent standard.”		
16	NV contributes towards sustainable development by provision of green space	Comment noted	LP-261-2
17	In relation to renewable energy only solar is identified but could mention other small scale installations	It is understood that this comment relates to Policy ZC2. The supporting text has been changed to clarify that solar panels are just one example.	LP-292-21 LP-267-27
18	Demand for electric vehicle (EV) chargepoints for non-domestic buildings is not always identified. There should be more flexibility to allow installation at a later date where there may be a lack of initial demand.	This would be assessed on a case-by-case basis.	LP-284-18
19	For EV infrastructure there should be co-ordination with SRN where applicable	This would be a matter to consider on a case-by-case basis as part of the assessment of the development	LP-321-40
20	Installing EV chargepoints may increase costs without immediate benefits for low-income households. Should consider shared infrastructure and communal solutions for EV charging and greenroofs, etc	Installing EV points at properties with driveways is also a requirement of Building Regulations. Installing domestic EV points will mean that low income households will not have to bear the additional installation costs and will make their transition to EVs easier. All proposals will be considered on a case-by-case basis.	LP-278-20
21	Proposals should demonstrate how they support and enhance sustainable transport and recreation routes. These should be integrated into new developments	An assessment of sustainable transport links and how they integrate into new developments is required in part c) of the policy.	LP-365-13

	Respondents comments	MCC Response	Respondent ID
22	Include additional wording to part d to reflect guidance published by Sport England - " <u>adopting the principles of active design</u> to minimise the need to travel and encourage"	No change proposed to the plan. The proposed wording doesn't make a material difference to the policy criteria.	LP-277-9
23	Transport integration and promoting sustainable travel is welcomed but close to the SRN network transport assessments should ensure modal shift strategies are realistic. For freight movements generated close to the SRN traffic assessments should show how congestion would be managed.	This would be a matter to consider on a case-by-case basis as part of the assessment of the development and through the assessment of travel plans.	LP-321-40
24	Should be a presumption against development on green belt and green field sites	Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP-267-27
25	Support but no mention in the policy of location such as the use of greenfield sites such as Ryebank Fields	This policy only seeks to consider the nature of the development itself, the location of development is considered elsewhere in the plan Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP_395-12
26	The Local Plan should contain policies to mitigate and adapt to climate change and recognition of the benefits of biodiversity in this process	Consideration is included at part h) of the policy.	LP-325-8
27	Support but suggest origin and status of the Manchester Net Zero Carbon Building is clarified. Should also reference UK Net Zero Carbon Building Standard (UKNZCBS)	Change agreed. The supporting text includes additional wording: There is currently a degree of uncertainty as various different standards are being developed including the UK Net Zero Carbon Building Standard (UKNZBS). The development of standards both at a local and national level will	LP-284-18

	Respondents comments	MCC Response	Respondent ID
		be assessed as part of any future guidance for the implementation of this policy.	
28	The Manchester Net Zero Building Standard is not part of the development plan and therefore it is inappropriate to afford weight to it in the document	The document forms part of the evidence base for the Local Plan and as a result it does form part of the development plan.	LP-301-4 LP-269-11
29	Support but also make mention of the city's carbon budget due to the importance of cumulative emissions	Change agreed and amendments made to the supporting text. "The City has committed to a carbon budget to provide a science-based approach to its approach to climate change mitigation and adaptation."	LP-292-21 LP-267-27
30	Support but recommend BREEM is referenced throughout the policy as it has a broad remit on sustainable developments including water efficiency requirements	The policy recognises the BREEAM standards and where they are not mentioned specifically there is acceptance of an accepted equivalent standard.	LP-29-17

	Respondents comments	MCC Response	Respondent ID
31	Required standards should be in line with national Government guidance, proposed changes to the Building Regulations and the Ministerial Statement issued in December 2025. Increased local standards should not be introduced and could add costs to developments.	The city of Manchester, through Manchester Climate Ready and the recently published The Plan 2025-30, has identified a science-based target to reach zero carbon by 2038. The Council is supportive of this ambitious target. The regional Spatial Plan, Places for Everyone (PfE), acknowledges this target and the actions that will need to be made to meet it. PfE was prepared under a previous NPPF Which allowed for the development of local targets and this Local Plan, which sits under the PfE therefore has been produced under the earlier guidance A Viability assessment has been carried out in relation to all policies within the Local Plan.	LP-306-3 LP-301-4 LP-300-8 LP-269-11
32	Not aware of any nationally recognised assessment methodology to consider whole life carbon lifecycle. Would need to consider how this was to be monitored, how it would work with other policies and provide a transitional period to allow for upskilling in the industry and supply chains	RICS has developed an approach - Whole life carbon assessment (WLCA) for the built environment and the London Plan has templates and guidance Whole Life-Cycle Carbon Assessments guidance London City Hall . This is a matter that will require additional guidance to be drawn up.	LP-269-11
33	Supportive of policy but should be flexible in the application of standards, taking into account the construction and use of the development	The policy wording has been amended to provide the consideration on a case-by-case basis and provide consistency with Policy ZC2.	LP-282-14
34	Support commitment to sustainability, encouraging re-use, whole life carbon assessments, energy efficiency standards and ensuring that buildings are designed for flexibility and adaptability and the	General support noted. The Local Plan provides a framework for assessing planning applications and it does not in itself provide or identify grant funding or	LP-278-20

	Respondents comments	MCC Response	Respondent ID
	promotion of sustainable transport. However, concerns around increased costs which may need additional subsidies to comply. Recommend inclusion of grants and incentives for affordable housing providers and gradual adoption of Net Zero standards for affordable housing to avoid cost shocks	financial support towards the cost of the development process.	
35	In relation to operational energy there needs to be clearer definition as to whether this includes both regulated and unregulated energy. The inclusion of unregulated energy is not supported.	Policy ZC2 includes in the third bullet, "... operational energy use (both regulated and unregulated) of a proposed development shall be considered at the design stage, to minimise any performance gap.	LP-300-8
36	There is no mention of social sustainability indicators such as community cohesion, health benefits, affordability. Recommend including metrics for affordability, well-being and community impact	The Local Plan provides a framework for assessing planning applications and it does not in itself assess all social and health considerations which are part of wider communities. New development proposals are assessed against all the policies within the Local Plan and decisions need to balance a number of different considerations.	LP-278-20
37	Encouraging high density could conflict with quality of life requirements such as adequate outdoor space	New development proposals are assessed against all the policies within the Local Plan and decisions need to balance a number of different considerations.	LP-278-20

Question No 41 - Towards Zero Carbon

Do you agree with this policy? Yes (10) In Part (6) No (0)

Yes (LP404-14, LP385-30, LP321-41, LP316-4, LP305-13, LPP299-8, LP290-11, LP266-8, LP28-41, LP16-10)

In part (LP315-13, LP300-9, LP272-13, LP261-3, LP27-26, LP23-3)

	Respondents comments	MCC Response	Respondent ID
1	Support	Support noted	LP-316-4 LP-305-13 LP-299-8 LP-266-8 LP-308-33 Lp-296-15 LP-385-30
2	Support but who ensures that it is implemented	Support noted. The Local Plan provides a framework for assessing planning applications which is how its policies are implemented.	LP-28-41
3	Degree of overlap between policies ZC1 and ZC2. Any duplication should be removed.	Policy ZC1 relates to the design and construction methodology of the development whereas ZC2 relates to the operational aspects of the developments once constructed. There is some minimal overlap relating to energy efficiency construction and energy demand, but this is considered to be minimal. The plan should be read as a whole.	LP-269-12
4	Support however should take into account developments of different scales. Should allow for exemptions of those that are sufficiently small in scale to result in minimal impacts. Should be clear	To meet the city's science-based net zero targets and stay within the carbon budget the calculations will be cumulative. Therefore, there will be a cumulative impact even from smaller	LP-276-15 LP-23-3

	Respondents comments	MCC Response	Respondent ID
	on what level of information required for differing scales of development.	developments. Consideration is being given to the need for additional guidance.	
5	No mention that all buildings should be fossil fuel free which would be supported or at least a strategy to remove fossil fuels should be included in the Sustainability Statement	There is a recognition that we are currently in a transition period towards net zero. Both the Sustainability Assessments and the Energy and Carbon Statements should indicate the steps being taken towards net zero.	LP-284-19
6	Support but remove “unless it can be demonstrated that it is not practical or financially viable”	The sustainability assessments will identify the measures that would need to be taken to meet the requirements of this policy. Developers would need to justify and provide evidence for not meeting these requirements.	LP-27-26 LP-290-11 LP-308-33 LP-296-15 LP-278-21
7	Support expectation of an energy demand reduction unless it can be demonstrated that it is not practical or financially viable.	Support noted.	LP_271-11
8	Achieving net zero standards requires significant upfront investment which could result in reducing the number of affordable homes delivered without subsidy. Recommend grant or low-interest loans to affordable homes providers to meet net zero requirements.	A Viability assessment has been carried out in relation to all policies within the Local Plan. It would be a matter for the applicant to justify why the policy is not being met as part of the planning submission The Local Plan provides a framework for assessing planning applications and it does not in itself provide or identify grant funding or financial support towards the cost of the development process.	LP-278-21
9	The introduction of embodied carbon assessment needs to be flexible to ensure that developments are viable and the cost implications are understood	This matter is caveated at the beginning of the policy.	LP-306-4

	Respondents comments	MCC Response	Respondent ID
10	Welcome recognition that it may not always be feasible or possible to incorporate renewable energy infrastructure on site	Comment noted	LP318-22
11	Offsetting should only be used in exceptional circumstances. It is not clear that any form of offsetting are effective substitutes for not creating pollution in the first place	Comments are noted. It is expected that offsetting would only come into effect once it has been demonstrated that net zero carbon requirements cannot be achieved on site.	LP-299-8
12	Allowing offsetting undermines on-site improvements and the actual benefits they provide to tenants	It is expected that offsetting would only come into effect once it has been demonstrated that net zero carbon requirements cannot be achieved on site.	LP278-21
13	Draft offsetting costs included in the PfE evidence base are higher than other parts of the country and could have impacts on viability. Should take account decarbonisation of the national grid to accurately represent the cost of carbon	It is acknowledged that further work is required around the requirements for offsetting. Comments regarding the national grid are noted.	LP-300-9
14	Whole life carbon assessments are supported and should consider transport related emissions close to the SRN	Comments are noted.	L-321-41
15	Support however would welcome clarification on timescales and whole lifecycle assessments stages and suggest amended wording. “The Council will expect new development to achieve net zero carbon. Where Whole Life Carbon assessments are required, the Local Planning Authority will allow for detailed assessments to be secured via condition at later stages of the planning process where early-stage details are insufficient.”	No change proposed to the plan. It is normal practice to include conditions where details are unknown or not specified at the application stage. Consideration is being given to the need for additional guidance.	LP-272-13
16	Support requirement for sustainability statement/assessments, installation of renewable	Such matters are included within Sustainability Statements/Assessments required under policy	LP-16-10

	Respondents comments	MCC Response	Respondent ID
	and low carbon energy and energy statements. Recommend extending these to include other sustainability and climate requirements, e.g. embodied carbon reduction, flooding, water stress/drought, overheating and biodiversity and climate resilience	ZC1. Consideration is being given to the need for additional guidance.	
17	Requirement for energy statements for all developments is unreasonable and should be dealt with through the Council's planning validation list.	The use of the planning validation list would form part of the approach. Consideration is being given to the need for additional guidance.	LP-269-12
18	Detailed energy statements are an administrative burden, and small housing associations may lack technical ability to complete them. Should allow for gradual transition to avoid cost shocks and combine carbon metrics with affordability and health concerns	Consideration is being given to the need for additional guidance.	LP278-21
19	Welcome reference to CIBSE TM54 but undertaking prior to the submission of a planning application will result in a number of assumptions leading to possible inaccuracies. Therefore, there should be flexibility to allow this assessment later in the process	It is normal practice to include conditions where details are unknown or not specified at the application stage. Further guidance will be provided on adoption of the Local Plan.	LP-300-9
20	Further clarification is required as to how the energy and space heating demand relate to the Manchester Net Zero Building Standard and the GMCA Net Zero Design Guidance	Further guidance will be considered as part of the adoption of the Local Plan.	LP-300-9
21	Support in part, however, do not support the energy standards required for non-residential space heating which are not achievable in all buildings. Should be	There is flexibility in the policy wording to allow for consideration on a case-by-case basis. There is currently a degree of uncertainty in this area as various different standards are under discussion	LP-284-19

	Respondents comments	MCC Response	Respondent ID
	amended to be in line with UKNZCBS limits when finalised.	nationally, with the UKNZCBS just one of these. It is still to be clarified whether these standards will help meet the city's net zero targets as set out by Manchester Ready.	
22	Supports ambition to move towards net zero carbon but this should be achieved through national standards	The city of Manchester, through Manchester Climate Ready and the recently published The Plan 2025-30, has identified a science-based target to reach zero carbon by 2038. The Council is supportive of this ambitious target. The regional Spatial Plan, Places for Everyone (PfE), acknowledges this target and the actions that will need to be made to meet it. PfE was prepared under a previous NPPF Which allowed for the development of local targets and this Local Plan, which sits under the PfE therefore has been produced under the earlier guidance	LP-269-12
23	Required standards should be in line with national Government guidance, proposed changes to the Building Regulations and the Ministerial Statement issued in December 2025. Increased local standards should not be introduced and could add costs to developments.	The city of Manchester, through Manchester Climate Ready and the recently published The Plan 2025-30, has identified a science-based target to reach zero carbon by 2038. The Council is supportive of this ambitious target. The regional Spatial Plan, Places for Everyone (PfE), acknowledges this target and the actions that will need to be made to meet it. PfE was prepared under a previous NPPF Which allowed for the development of local targets and this Local Plan, which sits under the PfE therefore has been produced under the earlier guidance	LP-306-4 LP-301-5

	Respondents comments	MCC Response	Respondent ID
24	The Manchester Net Zero Building Standard is not part of the development plan and therefore it is inappropriate to afford weight to it in the document	The document forms part of the evidence base for the Local Plan and as a result it does form part of the development plan	LP301-5
25	Policy could include reference to the use of canal water for water and cooling where adjacent to the canal network	The policy does not preclude this consideration where appropriate	LP-315-13
26	Open space provides potential or deep bores	Comments are noted. The policy does not preclude this consideration where appropriate	LP-308-33 LP-296-15
27	Welcome policy but opportunity to encourage water efficiency	It is proposed to include more detail relating to water efficiency elsewhere in the plan (see Policy EN8). Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP-29-18
28	Not a reasonable requirement for developments to maximise opportunities to generate energy from renewable or low carbon sources	To help meet net zero targets it is considered appropriate for developments to help meet their own energy demands where possible for low carbon and net zero sources. Justification not to meet these requirements would be provided through the Energy and Carbon Statement.	LP-269-12
29	Promote PV panels on roofs and recycling of grey water where possible	The use of solar panels is promoted in the supporting text. It is proposed to include more detail relating to water efficiency elsewhere in the plan (see Policy EN8). Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP-404-14

	Respondents comments	MCC Response	Respondent ID
30	District heating and communal solar could reduce costs for affordable housing schemes	Comments are noted.	LP278-21
31	Not convinced that offsetting would work but could provide for solar canopies on large car parks	Comments are noted.	LP-404-14
32	Support but ask that swift bricks and bat bricks are installed In new developments	Policy EN4 includes the potential to install swift/bat bricks. Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP-404-14
33	Propose that every new house should have a hedge and tree in the garden	Policy EN3 covers these matters. Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP-404-14
34	Support policy however should be expanded to highlight that natural habitats can provide eco-system services to contribute to achieving net zero targets	This is acknowledged in part h) of policy ZC1.	LP-291-23
35	NV contributes to net zero carbon by provision of a carbon sink	Comments noted	LP-261-3
36	Need to sustainably and rigorously check building materials and use certified materials only. Avoid the use of tropical hardwoods or timber from old growth forests.	Policy SP2 provides key development principles that would assist in addressing this matter. Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP-404-14
37	Developments near the SRN should consider carbon impact of associated transport movements. Transport assessments should identify modal shift and low carbon travel options. Installation of EV chargepoints should avoid congestion or strain on the SRN.	This would be a matter to consider on a case-by-case basis as part of the assessment of the development and through the assessment of travel plans.	LP-321-41

	Respondents comments	MCC Response	Respondent ID
38	Would welcome additional guidance on the calculation and minimisation of unregulated emissions from 2025, as mandated in PfE to ensure a comprehensive approach	Guidance has been produced to accompany PfE and can be accessed on the GMCAs website.	LP-272-13
39	The policy doesn't state how residual operational regulated carbon emissions will be calculated and offset. Doesn't state how or where offsetting should take place. Further advice or protocols be required to guide this process	Further guidance will be considered as part of the adoption of the Local Plan.	LP-284-19
40	Support in part however although flexibility in the policy is noted do not agree that targets should include unregulated energy demand	Support noted. No change proposed to the plan.	LP-300-9
41	The policy focuses on carbon reduction but doesn't address rent affordability or cost neutrality for tenants	The Local Plan provides a framework for assessing planning applications and decisions need to balance a number of different considerations. It should be noted that rent affordability or cost neutrality are not planning matters.	LP278-21

Question No 42 - Renewable and Low Carbon Energy

Do you agree with this policy? Yes (7) In Part (2) No (0)

Yes (LP385-31, LP299-9, LP290-12, LP284-20, LP267-28, LP27-27, LP16-15)

In part (LP305-14, LP28-42)

	Respondents comments	MCC Response	Respondent ID
1	Support	Support noted	LP-385-31 LP-299-9 LP-284-20 LP-27-27 LP-291-24
2	No comments	Noted	LP-16-15
3	Welcomes the policy subject to there being no detrimental impact to aviation safety. Suggest that this is added as material consideration in the policy	No change proposed to the plan. The plan should be read as a whole and Policies DM8 and DM9 provide sufficient detail on aviation safety measures.	LP-305-14
4	Support but suggest that policy could include targets for community owned renewable energy schemes. Makes references to a review of the Local Area Energy Plan (LAEP)	The comments are noted. The Local Plan provides a framework for the assessment of planning applications and therefore the policy does not itself set targets for renewable energy generation which are held in other documents and strategies, such as the LAEP and The Plan produced by Manchester Climate Ready. There are no current plans to review the LAEP.	LP-28-42
5	Support but would like to see details of other renewable sources	Comments noted. No change proposed to the plan as it is considered there is sufficient detail provided.	LP-290-12

	Respondents comments	MCC Response	Respondent ID
6	Support but should include reference to ward climate action plans (CAPs) and their regular review and monitoring with a requirement for them to include strategies to lower energy demand	Policies ZC1 and ZC2 consider energy efficiency requirements of new developments. The Local Plan provides a framework for the assessment of planning applications and therefore the policy does not include requirements for the production or review of other unrelated plans and documents. The Ward CAPs do include a section on Homes and Efficiency.	LP-267-28
7	Should include policy to include solar generating canopies on every carpark to be funded by carbon offset initiatives	Policy ZC2 does include a consideration for the installation of renewable and low carbon energy generation for all new developments.	LP-404-15
8	Consideration should be given to the location and environmental impact of battery storage provision. Notes that further detailed guidance is available on this matter	Comment noted. The plan should be read as a whole and in particular Policies SP2 and DM1 provide a range of matters to be considered for all development proposals.	LP-324-11

Question No 43 - Heat Networks

Do you agree with this policy? Yes (7) In Part (8) No (0)

Yes (LP385-32, LP323-7, LP321-42, LP309-41, LP299-10, LP267-29, LP27-24)

In part (LP404-16, LP315-14, LP305-15, LP300-10, LP284-21, LP261-17, LP28-43, LP16-7)

	Respondents comments	MCC Response	Respondent ID
1	Support	Support noted	LP-385-32 LP-299-10 LP-27-24
2	Support provided that energy is generated from carbon neutral sources	Newly developed heat networks are expected to be fed by low carbon sources, not necessarily carbon neutral.	LP-404-16 LP-300-10
3	Support but acknowledge cross-boundary opportunities to heat network delivery	Change agreed. Additional sentence added into supporting text. “There are also cross boundary opportunities for heat networks.”	LP-323-7
4	Support. Where a heat network crosses the SRN National Highways will be required to ensure that it can be safely accommodated	Comments noted	LP-321-42
5	Support. Include reference to use of canal water for heating and cooling in developments adjacent to the canal network	No specific source has been mentioned to ensure flexibility in consideration.	LP-315-14
6	Support but concerns over controlling potentially high costs to residents	Comments noted	LP-309-41
7	Wish to be consulted about proposals and designation at the Airport	Comments noted.	LP-305-15

	Respondents comments	MCC Response	Respondent ID
8	Further requirement for decarbonisation plans of existing networks to be robust and timelines provided.	Change agreed. Additional sentence added into supporting text. “Opportunities will include the decarbonisation of existing heat networks based on robust plans and clear timelines.”	LP-300-10
9	Works to facilitate future connection only where the design of the building isn’t compromised	In new buildings it would be expected that any design should be able to incorporate the necessary plant, etc. Acceptable incorporation into works to existing buildings would be a consideration in the assessment of the proposals.	LP-300-10
10	Support but suggest that policy could include targets for community owned renewable energy schemes. Makes references to a review of the Local Area Energy Plan (LAEP)	The comments are noted. The Local Plan provides a framework for the assessment of planning applications and therefore the policy does not itself set targets for renewable energy generation which are held in other documents and strategies, such as the LAEP and The Plan produced by Manchester Climate Ready. There are no current plans to review the LAEP.	LP-28-43
11	Include explicit statement regarding the size of development that should connect to a heat network	The requirement is for major developments to connect to existing and planned networks. Major developments are defined in the Planning regulations.	LP-267-29
12	Noted that NV is located within the HN map	Comments noted	LP-261-17
13	Concern over mandating connection to existing or planned heat networks without full consideration of the financial, technical and operational risks to residents and social landlords. Bulk connections can expose housing associations to	These aspects are covered by the upcoming heat network regulations and Ofgem have been appointed as the consumer regulator. They do not form part of planning considerations.	LP-16-7

	Respondents comments	MCC Response	Respondent ID
	long term asset management costs without any compensating income from energy sales		
14	Fragmented network ownership risks poor outcomes for residents	These aspects are covered by the upcoming heat network regulations and Ofgem have been appointed as the consumer regulator. They do not form part of planning considerations.	LP-16-7
15	Connection costs are a high variable.	These aspects are covered by the upcoming heat network regulations and Ofgem have been appointed as the consumer regulator. They do not form part of planning considerations.	LP-16-7
16	Unreasonable burden on penalties for non-compliance with flow and return temperature parameters. Include provisions to remove such penalty caps.	The Local Plan provides a framework for the assessment of planning applications and the policy itself would not set the parameters for the operation of the heat network themselves. This is dealt with by by the upcoming heat network regulations.	LP-16-7
17	Need clear standards and protections to ensure equitable outcomes through clarifying responsibilities, consumer protection, transparent connection cost methodologies, guidance on long term asset liabilities	These aspects are covered by the upcoming heat network regulations and Ofgem have been appointed as the consumer regulator. They do not form part of planning considerations.	LP-16-7
18	Include flexibility in relation of compliance with the heat hierarchy and not a requirement to recognise that heat networks are one aspect of path towards decarbonising heat. The Government identifies a number of exemptions	Comment noted. There are a number of exemptions to connection that are noted in the heat network regulations.	LP-269-13
19	Heat network consumers can pay a higher price for heat than alternative sources with fewer protections and with less opportunities to switch suppliers	Comment noted	LP-269-13

	Respondents comments	MCC Response	Respondent ID
20	Explicit reference to the use to ground source heat pumps (GSHP) and support the use of installing on open space near buildings. Propose to reword policy to include GSHPs and include additional map. Also include cross reference to and from open space policies	A general reference to heat pumps is made in paragraph 11.13 in support of policy ZC2 in relation to renewable generation in new developments. GSHPs are a form of energy source installation whereas heat networks are the means of distributing that heat energy and as a result it would not be appropriate to include reference within this policy. Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP-255-1
21	HNs can be more expensive	These aspects are covered by the upcoming heat network regulations and Ofgem have been appointed as the consumer regulator. They do not form part of planning considerations.	LP-284-21
22	Seek recognition in the policy that lower carbon solution could be delivered without connecting to a HN.	Comments noted however through heat network zoning further investigations will indicate areas where HNs offer the lowest cost option for decarbonised heat, as per the HN Regulations and exemptions. Proposals will be assessed through Energy assessments and consideration of alternative solutions.	LP-284-21