

Manchester Local Plan (Publication Draft) Regulation 19

5. Topic Paper: Zero Carbon

1. Policy Context

National

- 1.1 The 2021 NPPF promoted a transition to a low-carbon future through policies aimed at reducing greenhouse gas emissions, supporting renewable and low-carbon energy generation, increasing climate resilience and encouraging energy-efficient development. Paragraphs 152 to 156 provided the key aspect of national policy relating to plan making aspects for climate change and zero carbon-based policies.
- 1.2 While the 2021 version of the NPPF referred to "radical reductions" in emissions and support for a low-carbon future, it did not explicitly reference the UK's legally binding net zero target. The 2024 NPPF explicitly stated that the planning system should support the transition to net zero by 2050, introduced a requirement to consider the full range of climate change impacts in plan-making and decision-taking, strengthened links between climate resilience and community health, and gave significant weight to the benefits of renewable and low-carbon energy development. Collectively, these changes strengthened the national policy basis for ambitious local planning policies aimed at reducing carbon emissions and supporting the transition to a net zero future.

Sub-Regional

- 1.3 Places for Everyone establishes a strategic policy framework aimed at supporting the city-region's ambition to become carbon neutral by 2038. Policies JP-S2 (Energy and Carbon) and JP-S3 (Low Carbon Heat) require development to minimise energy demand, reduce carbon emissions, incorporate renewable and low-carbon energy generation, and transition away from fossil fuel heating systems. Supplementary Net Zero Design Guidance published by GMCA provides detailed expectations for achieving net zero carbon development and implementing low-carbon heat solutions. Together, these policies represent an ambitious approach to carbon reduction and provide a robust strategic basis for local zero carbon planning policies.

2. Evidence Base

Net Zero New Buildings - Shaping Manchester's Local Plan

- 2.1 The report was prepared by the Manchester Climate Change Agency and industry experts to provide an evidence base and recommendations for incorporating ambitious net zero building standards into Manchester's new Local Plan. It sought to address the challenge that Manchester has a science-based target to become zero carbon by 2038 and operate within a carbon budget of 15 million tonnes of Carbon Dioxide with buildings accounting for approximately three-quarters of Manchester's direct emissions.
- 2.2 The report recommended that Manchester's Local Plan required all major new development to reduce embodied and operational carbon, split over three time periods, ultimately delivering net zero new buildings through measurable standards, transparent reporting and robust planning policy
- 2.3 The report proposed targets for a range of residential and commercial property types. This has been adapted within the policy set out in the plan in part to address viability assessment requirements (the original split across different development types was too complex to model). It was also considered a pragmatic approach that complemented the policies set out in Places for Everyone (JP S2 and JP S3).

3. Regulation 18 Consultation – Summary of Response

- 3.1 The consultation identified strong overall support for all of the Zero Carbon policies. The key issues raised focussed on viability and flexibility, rather than opposition to climate/zero carbon objectives. Points included:
 - Strong support for sustainable construction, retrofit-first approaches, whole-life carbon assessments and higher sustainability standards.
 - Many developers and industry respondents requested flexibility where requirements are not practical or financially viable.
 - Calls for stronger requirements on demolition justification, biodiversity enhancement, sustainable drainage, water efficiency and climate adaptation.
 - Suggestions to recognise technologies such as canal-water heating/cooling and a wider range of renewable energy technologies.
 - Concerns around costs of EV infrastructure and implementation of embodied carbon assessments.
 - Requests to reference the UK Net Zero Carbon Building Standard and Manchester's carbon budget.

4. Integrated Appraisal

- 4.1 The Integrated Appraisal identifies that the Local Plan supports the city's ambition to become net zero carbon by 2038 and that climate change is embedded throughout the plan, not just in specific carbon policies. The IA concludes the Plan has an overall minor positive effect on climate change, helping reduce emissions and improve resilience, although growth and airport expansion will continue to generate emissions.
- 4.2 The four specific policies (ZC1 to ZC4) are assessed and alongside other policies in the Local Plan, the IA concludes that the plan delivers:
- Strong net zero ambition.
 - Dedicated zero-carbon policy suite (ZC1-ZC4).
 - Sustainable location strategy.
 - Strong support for active travel and green infrastructure.

The IA does identify some challenges including:

- Significant growth still creates emissions.
- Airport expansion remains a major challenge.
- Viability considerations may limit carbon standards on some schemes.
- The Plan alone is unlikely to achieve net zero without national action and wider behavioural change.

5. Conclusion

- 5.1 The proposed Zero Carbon policy framework provides a robust and locally distinctive approach to supporting Manchester's ambition to become a zero-carbon city by 2038. It responds to the strengthened national policy context, aligns with the strategic direction established through Places for Everyone, and is underpinned by a comprehensive local evidence base demonstrating the importance of reducing emissions from new development.
- 5.2 Evidence indicates that buildings represent a significant proportion of Manchester's carbon emissions and that achieving the city's carbon budget will require ambitious action to reduce both operational and embodied carbon. The proposed policies therefore seek to ensure that new development minimises energy demand, supports low-carbon and renewable energy generation, reduces whole-life carbon impacts and contributes to climate resilience.

- 5.3 Consultation responses demonstrated support for the overall objectives of the Zero Carbon policy approach, with comments primarily focused on ensuring flexibility in circumstances where viability or site constraints present challenges.
- 5.4 The Integrated Appraisal concludes that the Local Plan will make a positive contribution towards reducing greenhouse gas emissions and adapting to climate change, with the Zero Carbon policy suite forming a key component of this approach. While recognising that planning policy alone cannot deliver net zero and that wider national action and behavioural change will also be required, the proposed policies provide an important mechanism for ensuring that future development supports Manchester's transition to a low-carbon and climate-resilient future.