

## Places for Everyone, week 3 – Carbon emissions

On Tuesday, 29 November, the [Planning Inspectorate's examination of Greater Manchester Combined Authority's Places for Everyone](#) (P4E) plan turned to its policies for sustainability.

Our particular interest has been about the plan's proposals for reducing carbon emissions. There were two key elements in the original plan, both of which we support;

1) *"The aim of delivering a carbon neutral Greater Manchester no later than 2038, with a dramatic reduction in greenhouse gas emissions."*

2) *"An expectation that new development will ... be net zero carbon from 2028."*

These are both quotations from Policy JP-S 2 Carbon and Energy, on page 87 of the published plan we reproduce this policy in its entirety, [here](#). The first comes from the [5 year environment plan](#) which in turn was advised by the University of Manchester Tyndall Centre on Climate Change. The second came originally from the forerunner of Places for Everyone, the GM Spatial Framework: it is reproduced in the Environment Plan.

### Changes at very short notice

Greater Manchester Combined Authority (GMCA) came to this session with a number of proposed changes to the policy. Some of these were a result of changes to the context since the plan was published – for example and upgrading of the building regulations. Others, however, were controversial and really should not have been announced in this way, such that those attending the hearings would not have time to consider them carefully. Luckily, we and our allies from *Friends of the Earth*, *Save Greater Manchester's Green Belt* and the *CPRE* were well prepared and able to respond – to what effect we will discover later.

We picked up a problem with the wording of the first of the two key aims, becoming carbon neutral. We pointed out that "carbon neutrality", is defined in the 5 year Environment Plan (Page 17, aim no 1) as, *"For our city region to be carbon neutral by 2038 and meet carbon budgets that comply with international commitments"*, and the Tyndall report, which underpins the plan, on page 3 defines carbon neutrality in 2038 as *'emitting no more than 0.6 Mtonnes CO<sub>2</sub> annually, just 3% of the 1990 levels'*. However, there is no

definition in P4E. We therefore suggested that this two-element definition be included, as a footnote, thereby correcting the vagueness in the aim as described.

It was in respect of the second aim, buildings being net zero carbon by 2028, that GMCA introduced two problematic changes.

**Firstly, they wanted to change “An expectation that new development will be net zero carbon from 2028” replacing the words “An expectation...” to the weaker “Work towards...”**

We argued against this on two grounds.

1) The wording was already not definitive: you can expect something but it won't necessarily happen.

2) A further weakening of the aim will reduce the region's ability to meet the requirement to be carbon neutral by 2038. As *Manchester FOE* pointed out, it will mean homes being delivered that then have to be retrofitted with better heat tightness, and better heating systems, before 2038. As we noted, that will place additional costs on the new occupiers (who would already be paying more than they would have needed to in fuel costs) and not on the developers who will have taken their profits by then.

It is pressure from the developers that is almost certainly responsible for this change.

There were some other changes proposed by GMCA to the wording. They conceded that footnote 31 is confusing and it was helpful that GMCA had on hand Adam Mactavish of the consultancy firm *Currie and Brown* to explain what was actually envisaged. He was one of the authors of the first of three supporting papers on Carbon and Energy<sup>1</sup> and the proposal had rather got lost in translation. He made it clear that there were actually three stages to the policy implementation.

From 2025, the critical requirement is that regulated operational energy use<sup>2</sup> be within set limits (an 80% reduction in energy use). From 2025 to 2028, unregulated energy use<sup>3</sup> would also be subject to set limits. Remaining

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1 Carbon and Energy Implementation [Part 1 - Technical Analysis](#)

2 Energy use that is subject to building regulations, i.e. that used for space heating, hot water and lighting together with directly associated pumps (for circulating water) and fans (eg for ventilation).

3 Energy use not controlled by building regulations: In homes this includes energy use for cooking, white goods and small power (eg, TVs, kettles, toasters, IT, etc). Broadly

emissions would be offset through a scheme devised by GMCA (see below). From 2028, the full [UK Green Building Council definition of net zero buildings](#) would be met, namely, both the operational energy use (that of running the building) and the building's product and construction stages (including "embodied energy") are negative or net zero. Note that, according to the definition, part of the former could be a result of electricity grid decarbonisation or local renewable generation, and some operational and construction emissions could be offset at each of the above steps – a question we'll also return to.

We welcomed the clarification, especially the commitment to making the building's embodied emissions negative, since these are the biggest (in the medium term) and most problematic element. We suggested the footnote be corrected to cover all three phases.

In a further concession to the developers, GMCA proposed adding the words "**subject to viability assessment**" to the policy on net zero buildings. As we pointed out, the *National Planning Policy Framework* (NPPF) already has this provision which is widely used as a "get out of jail" card by developers, sometimes with the willing collusion of councils keen to get the supposed benefits of more building in their patch. So the addition of those caveating words looks like a kind of inverted "virtue signalling" – to the developers. As we have seen, there are grounds for doubting the thoroughness of GMCA's commitment to carbon neutrality: *Places for Everyone*, despite some good policies, is, as a whole, likely to make it harder for the region to avoid [prematurely burning through the already overshooting carbon budget](#). This implied bending of the rules, or deferment of action, rings more alarm bells. That is notwithstanding the excellent proposals in the policy as published.

## Offsets

What about those offsets in the policy though? The Tyndall report that laid the ground for the GM carbon budget gave this advice<sup>4</sup>, which is worth reproducing in full.

*Ambition for 'carbon neutrality' is often accompanied by commitments on 'carbon offsetting'. Carbon offsetting refers to the purchase of a tradeable*

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speaking, energy for the things you plug in.

4 [https://www.research.manchester.ac.uk/portal/files/83000155/Tyndall\\_Quantifying\\_Paris\\_for\\_Manchester\\_Report\\_FINAL\\_PUBLISHED\\_rev1.pdf](https://www.research.manchester.ac.uk/portal/files/83000155/Tyndall_Quantifying_Paris_for_Manchester_Report_FINAL_PUBLISHED_rev1.pdf)  
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*unit, representing emissions rights or emissions reductions, to balance the climate impact of an organisation, activity or individual. Although they can be stored and traded like a commodity, they are not material things; offset credits are not literally “tonnes of carbon” but stand in for them and are better regarded as intangible assets or financial instruments. To act as an offset, units must be cancelled to represent a reduction and prevent further trading.*

*In this report, the term ‘offset’ refers to the purchase and cancellation of tradeable units representing emissions reductions or sequestration outside the boundary of Greater Manchester to compensate for ‘residual’ carbon emissions. All carbon offset arrangements are open to criticism as being ineffective at reducing emissions. ‘Carbon neutrality’ achieved this way is an accounting procedure rather than a physical status. These procedures and the context under which they operate are liable to change through time, for better or worse. In light of this, we would not recommend entering into offset relationships. If GMCA identify financial resources and the necessity to pursue this path then they should i) only consider regulated systems and purchases, ii) revisit the available tradeable units at the time of purchase to consider which are the most robust and reliable, iii) recognise that this will be a controversial approach potentially drawing criticism, and public and professional cynicism.*

The second Carbon and Energy background paper, from *The Centre for Sustainable Energy*<sup>5</sup>, looks into offsetting in detail, making recommendations for how such a scheme, for residual emissions, might operate in Greater Manchester. It is a very thorough report, with a lot of technical detail on the administration of a GM offsetting scheme in which developers would pay an offsetting levy for residual emissions. The recommendations are for a departure from the green washing kind of offsetting that is so common elsewhere.

*The climate emergency, the UK wide 2050 zero carbon target and the Greater Manchester 2038 net zero carbon target fundamentally challenge the conventionally accepted approach to additionality and carbon offsetting, in that within these timescales, effectively all carbon emissions will need to be avoided or sequestered in carbon sinks.*

*Thus the timing and rate at which emission reductions are achieved is critical, in that if Greater Manchester is to meet its commitment to become carbon neutral by 2038, the residual emissions from new development would also*

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<sup>5</sup> Carbon and Energy Implementation [Part 2 - Carbon Offsetting](#)

*need to be offset by the 2038 deadline rather than over the lifespan of the measure funded – which has typically been used in the past.*

To give an idea of the kind of things that the Environment Fund resulting from offset payments could finance, they suggest, as priorities,

- *Energy efficiency retrofitting of housing (council housing and private rental sector), community and council buildings, including council run projects and funding applications from the community.*
- *Community energy projects, adapting the Greater Manchester Low Carbon Fund to offer funding to community energy projects, or developing a new funding route, similar to the Urban Community Energy Fund*
- *Domestic Renewable energy projects, for example a Greater Manchester Reverse Solar Auction and / or rooftop solar installations on council buildings*
- *Carbon sequestration through tree planting and peat bog restoration*

This is probably as good as offsetting is ever going to get. The scheme might not actually fully compensate for the emitted carbon (and monitoring arrangements are proposed, so we should eventually have a good idea about its effectiveness) but it would facilitate a significant degree of carbon reduction.

## **Developers' stories**

We heard a lot from the developers at this session. They were largely directed at reducing the strength of the sustainability policies, effectively increasing the wriggle room they would have to avoid aspects of the policy and so protect the levels of profits.

The GMCA's "brownfields first" policy, (SP-1) was a particular bone of contention. In a particularly spurious argument, Christopher Young KC, representing Peel Holdings, suggested that it would increase homelessness and that greenfield sites, not brownfield sites deliver affordability. He referred to [an article](#) in *Manchester Evening News* that showed how few affordable homes had been built in Manchester and which analysed the causes of the surge in homelessness in the city. In fact, as the Evening News article made clear, Manchester's homelessness problem is partly attributable to the council's policy choice in Manchester to not build homes for social rent. That

policy has been reversed following a backbench rebellion. By the government's figures, delivery of affordable homes in general (and homelessness relates to a shortage of a sub class of these, with affordable, "social rents") has been creeping up. Salford has a better record. In both cases it is clear that it is not the developers that will delivering a solution to homelessness. Some years ago, Salford established its own company to do just this, and Manchester has more recently done the same thing. There is a lot more to do, but the fact that developers in Manchester have been able to use the viability get-out to get planning permission for their many schemes gives the lie to the idea that unconstrained developer freedom will be a cure for homelessness. The idea that the kind of greenfield sites favoured by private developers will somehow be a solution to homelessness is specious: those developments are not developments for social rent either. While we are indeed critical of much of the P4E plan, we do commend the targets in it for the proportion of affordable and social rent homes. However, on Thursday, that 50,000 affordable homes pledge was relegated from the policy to the descriptive text, effectively making it more of an aspiration rather than a commitment.

Another argument offered, this time by Ian Gilbert, for Barton Willmore, seemed to be that decarbonising buildings depended on the decarbonisation of Grid electricity. Now it is true that a lot of the recent reduction in UK territorial carbon emissions has been due to the closure of coal-powered generation and the increase in renewable energy. That trend will continue, but not fast enough. However the argument ,that this means that zero carbon homes cannot be delivered, makes no sense. It is possible to reduce operational energy to very low levels by making the building heat tight, using energy efficient heat sources (this usually means heat pumps). By generating energy at the building development, usually via photovoltaic panels, energy used in the home can be "paid back" into the grid (or, albeit with a greater demand on materials, in a local battery). To the extent that a surplus of energy is produced, and exported, then it is possible to achieve net zero carbon emissions. Embodied and construction emissions are certainly more difficult but do not come from the still carbon emitting part of grid energy.

## **Clean Air**

It was a long day. In the main we wanted to be supportive to GMCA, which is at least [committed to emissions reduction](#). However, we were not impressed by the late announcement of measures that would weaken the policies.

Another topic concerned clean air, which is another policy on which the GMCA, and the mayor himself, has backtracked on shamefully with the unicorn proposal currently before government of a clean air zone with no charging. Friends of the Earth pointed out that the WHO guidelines on pollutant levels had been revised downwards since the plan was published and it was agreed that reference would now be made to the new levels. We anticipate that the government will reject the GMCA clean air zone proposal. [In London, the Mayor has decided to extend the ultra clean air zone](#) to most of Greater London – what a contrast.

You can watch the session here <https://www.youtube.com/watch?v=It19io9EnMI>

Steady State Manchester

December, 2022