

**Manchester City Council
Report for Information**

Report to: Environment and Climate Change Scrutiny Committee – 9
February 2023

Subject: Planning Policy and Climate Change

Report of: Director of Planning, Building Control and Licensing

Summary

The report considers how planning policy contributes to addressing climate change. It provides a general overview of current planning policy; an update on emerging planning policy (Places for Everyone and the Manchester Local Plan); a brief summary of proposals announced at the national level on 22 December 2022; and provides key information on carbon standards for new build homes; flooding mitigation and heat island mitigation. It also includes a summary of the current consultation on updates to the National Planning Policy Framework (NPPF) expected this Spring; and potential future changes to NPPF via the Levelling Up and Regeneration Bill.

Recommendations

The Committee is recommended to:-

- (1) To consider and comment on the current and emerging planning policy approach that seeks to address climate change; and
 - (2) To consider and comment on the proposals set out in the consultation on updates to the National Planning Policy Framework (NPPF) expected this Spring; and potential future changes to NPPF via the Levelling Up and Regeneration Bill.
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Wards Affected: All

<p>Environmental Impact Assessment - the impact of the issues addressed in this report on achieving the zero-carbon target for the city</p>
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<p>The planning system will continue to help the city work toward zero carbon including by encouraging compact patterns of urban development, with housing accessible by active and public transport to employment and services; preserving and improving green and blue infrastructure by encouraging development in existing urban areas; and supporting zero carbon building standards through development planning processes.</p>

Equality, Diversity and Inclusion - the impact of the issues addressed in this report in meeting our Public Sector Equality Duty and broader equality commitments

The Local Plan will include the completion of the Equality Impact Assessment (EqIA). To inform how the draft policies in the plan may impact on different protected or disadvantaged groups.

Manchester Strategy outcomes	Summary of how this report aligns to the OMS/Contribution to the Strategy
A thriving and sustainable city: supporting a diverse and distinctive economy that creates jobs and opportunities	The city's planning system aims to improve Manchester's economic performance and spread the benefits of this growth across the city to reduce economic, environmental and social disparities, and to help create inclusive sustainable communities.
A highly skilled city: world class and home grown talent sustaining the city's economic success	The city's planning system incorporates a vision for Manchester of a knowledge-based economy flourishing within an entrepreneurial community, characterised by a fully skilled, inclusive working Population, and includes policies to deliver this through key strategic locations across the city.
A progressive and equitable city: making a positive contribution by unlocking the potential of our communities	The city's planning system aims to reduce economic, environmental and social disparities, and to help create inclusive sustainable communities.
A liveable and low carbon city: a destination of choice to live, visit, work	The city's planning system aims to provide a framework within which the sustainable development of the city can contribute to halting climate change. It also aims to provide a network of distinctive, attractive and high-quality centres.
A connected city: world class infrastructure and connectivity to drive growth	The city's planning system aims to improve Manchester's physical connectivity, through sustainable and accessible transport networks, to enhance its functioning and competitiveness and provide access to jobs, education, services, retail, leisure and recreation.

Full details are in the body of the report, along with any implications for:

- Equal Opportunities Policy
- Risk Management
- Legal Considerations

Contact Officers:

Name: Julie Roscoe
Position: Director of Planning, Building Control and Licensing
Telephone: 0161 234 4552
E-mail: julie.roscoe@manchester.gov.uk

Name: Duncan McCorquodale
Position: Planning and Infrastructure Manager
Telephone: 07507065558
E-mail: duncan.mccorquodale@manchester.gov.uk

Name: Des Jones
Position: Planning Section Manager
E-mail: des.jones@manchester.gov.uk

Background documents (available for public inspection):

The following documents disclose important facts on which the report is based and have been relied upon in preparing the report. Copies of the background documents are available up to 4 years after the date of the meeting. If you would like a copy please contact one of the contact officers above.

- Manchester Core Strategy Development Plan 2012 to 2027
- Places for Everyone Publication Plan 2021 and subsequent Examination documents (see the Examination Library at [GMCA – Places For Everyone Joint DPD | Helen Wilson Consultancy Limited \(hwa.uk.com\)](#))
- 9 September 2021 report to Environment and Climate Change Scrutiny Committee on Planning and its contribution to address climate change
- Government Consultation Proposals (December 2022) [Levelling-up and Regeneration Bill: reforms to national planning policy - GOV.UK \(www.gov.uk\)](#)

1.0 Introduction

1.1 This report outlines how planning policy in Manchester contributes to addressing climate change. It provides:

- a general overview of current planning policy including key information on how carbon standards for new build homes; flooding mitigation and heat island mitigation are addressed in section 3;
- an update on emerging planning policy (Manchester Local Plan and the joint local plan, Places for Everyone) in section 3; and
- a brief summary of proposals published by the Government which is consulting on updates to the National Planning Policy Framework (NPPF) expected this Spring; and potential future changes to NPPF via the Levelling Up and Regeneration Bill. A summary of the key aspects that are pertinent to the climate change agenda is set out in section 3.
- Detail on the planning application process and the considerations brought into play when considering climate change matters; and how considerations on climate change are included in the permitted development process (section 4).

2.0 Background

2.1 The planning system is part of an overall strategy in the city and a suite of measures being used to tackle climate change, including:

- our science-based target to achieve zero carbon by 2038;
- the Climate Change Action Plan and actions within it;
- our role in the Manchester Climate Change Partnership and Manchester Climate Change Framework, working with partners to collaboratively take action on climate change at the city scale.

2.2 It is one way of helping to address climate change and influence and support change through place-making and the use of land and buildings. The Core Strategy (the main document of the current Local Plan), adopted in 2012, includes clear objectives that seek to deliver sustainable development; and cover matters such as tackling contaminated land, improving air quality, reducing pollution, reducing emissions from buildings, promoting less waste, supporting sustainable travel, minimising flood risk, and construction management. Further detail on how policies are delivering positive outcomes for carbon standards for new build homes; flooding mitigation and heat island mitigation are set out in Section 3.

2.3 As required by Government, we are reviewing the city's Local Plan. This dovetails with the joint local plan, Places for Everyone, that is very well advanced (currently at the hearings stage). The emerging policy framework presents an opportunity to consider how potential changes can be developed to strengthen the existing framework in the Core Strategy, given the urgency of the climate challenge and the need to accelerate responses at all levels of society.

2.4 Government is currently consulting on updates to the National Planning Policy Framework (NPPF) expected this Spring; and potential future changes to NPPF via the Levelling Up and Regeneration Bill. A summary of the key aspects that are pertinent to the climate change agenda is set out in section 3.

3.0 Main issues

Current Planning Policy

3.1 The Core Strategy sets out specific policies for Manchester that already seek to address climate change; the key policies are set out in paragraph 3.2. However, as with national policy, the core strategy must be read as a whole to guide development towards sustainable solutions.

3.2 The key aspects that pertain to climate change include the following:

- Spatial Principle SP1 - to provide a framework within which the sustainable development of the city can contribute to halting climate change.
- Core Development Principles (within Policy SP1) - to minimise emissions, ensure efficient use of natural resources and reuse previously developed land wherever possible, and ensuring development is located to reduce the need to travel and provide good access to sustainable transport provision.
- Policy DM 1 Development Management – including requirements for appropriate siting, sustainable transport, biodiversity, green infrastructure, flood risk, and energy targets.
- Policy EC 1 - development proposals should have regard to climate change resilience demonstrating how CO₂ emissions will be minimised with an aim of zero carbon emissions, through energy efficiency, renewable energy and contributing to low and zero carbon decentralised energy infrastructure.
- Policy T 1 - to deliver a sustainable, high quality, integrated transport system to encourage modal shift away from car travel to public transport, cycling and walking, to support the needs of residents and businesses and to prepare for carbon-free modes of transport. This includes the Council supporting proposals that facilitate modes of transport that reduce carbon emissions, such as by incorporating charging points for electric vehicles. The Core Strategy also sets minimum cycle parking standards for development types.
- Policy EN 4 - reducing CO₂ Emissions by enabling low and zero carbon development through a range of measures.
- Policy EN 5 - Strategic areas for low and zero carbon decentralised energy infrastructure.
- Policy EN 6 - Framework for CO₂ reductions from low or zero carbon energy supplies.
- Policy EN7 – a general presumption in favour of low and zero carbon decentralised energy schemes.
- Policy EN 8 Adaptation to Climate Change - All new development is expected to be adaptable to climate change in terms of the design, layout, siting and function of both buildings and external spaces.

- Policy EN 9 Green Infrastructure - New development is expected to maintain existing green infrastructure in terms of its quantity, quality and multiple function. Where the opportunity arises and in accordance with current Green Infrastructure Strategies the Council will encourage developers to enhance the quality and quantity of green infrastructure, improve the performance of its functions and create and improve linkages to and between areas of green infrastructure. New green infrastructure provision should be an exemplar of best practice and innovation in terms of both its design and management.
- Policy EN 15 Biodiversity and Geological Conservation – developers are expected to identify and implement reasonable opportunities to enhance, restore or create new biodiversity, either on-site or adjacent to the site, contributing to linkages between valuable or potentially valuable habitat areas where appropriate.

3.3 The policy framework allows the planning service to require development proposals to be supported by a range of information which is assessed as part of the planning process. This was set out in the report to Committee in December 2021. As a recap this includes:

- air quality impact assessment and mitigation;
- identification of ecological features or wildlife habitats and proposed biodiversity measures;
- Environmental Standards Statement addressing sustainability ratings and provision of renewable energy, along with a Building Research Establishment Environmental Assessment Method (BREEAM) pre-assessment rating (typically requiring at least a Very Good rating) (see xxx below)
- A Blue and Green Infrastructure Statement;
- A Flood Risk Assessment for sites in a designated Flood Zone or over 1 hectare in size, or over 0.5 hectares for sites in Critical Drainage Areas;
- Sustainable Urban Drainage Strategy;
- Transport Statement, including provision or futureproofing for electric charging points, public transport consideration, and parking management strategy;
- Travel Plan including strategies for integrating sustainable travel based on evidence of anticipated transport needs;
- where trees are impacted, a tree age and condition survey is required together with a tree replacement scheme (the approach is to seek via planning a two for one replacement, with three for one in some cases – the City of Manchester has approximately 19% tree cover); and
- demonstration of how carbon emissions will be minimised, working toward zero emissions, through energy efficiency, renewable energy and contributing to low and zero carbon decentralised energy infrastructure.

3.4 These documents are considered as part of planning applications to enable an informed and balanced decision to be made, giving regard to all key objectives, which along with addressing climate change include things such as delivering sufficient housing and building a strong, competitive economy.

- 3.5 In 2020, the validation list was amended to require the submission of a Construction Management Plan (CMP). Broadly speaking construction impacts are not material considerations for the local planning authority as these are controlled through other legislation. Requiring a CMP at the planning stage can allow early consideration of such impacts by relevant parties and allow for potential amenity and environmental issues and mitigation measures to be identified.
- 3.6 A significant area of work is incorporating climate change mitigation into retrofit works. Retrofitting is key for many of our existing homes to reduce energy requirements and improve energy efficiency. There are different ways to retrofit a home and in many instances the works involved would not require planning permission; being multi-faceted, this can include insulating roofs, walls and floors; replacing windows; improving ventilation design; airtightness works and more efficient heating and water systems. Where these works are internal and lead to no external changes these would be classed as permitted development, with some exceptions; equally, there are changes that can be made to the outside of a home that would not require permission. For example, the installation of solar panels and equipment could be permitted development, subject to certain limits and conditions. Fitting insulation would also not require planning permission unless there are changes principally to the front elevation of a dwelling. Where permission is required, officers will work with applicants to resolve any issues (usually around heritage or visual impact) as quickly as possible.
- 3.7 Appendix 1 sets out examples where existing planning policies have shaped current developments.

Emerging Planning Policy

- 3.8 The emerging Manchester Local Plan presents an opportunity to consider and review the existing planning policy approach to climate change, and potential changes to strengthen this; key given the urgency of the climate challenge and need to accelerate responses at all levels of society. Local Plans have a legal requirement to take account of climate change through Section 19(1A) of the Planning and Compulsory Purchase Act 2004. This requires local planning authorities to include in their Local Plans “policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change”.
- 3.9 Areas in the Local Plan that could be considered to further strengthen the city’s response include building standards, local energy generation, green and blue infrastructure, biodiversity, transport with climate change mitigation and adaptation running through these policy themes as a key consideration.
- 3.10 One of the key areas of policy development proposed in the local plan is the concept of an Urban Green Factor. This policy approach will bring together various strands of green infrastructure into a holistic view on how new development can incorporate “urban greening”. The concept has been previously developed via an adopted policy in the London Plan ([Urban](#)

[Greening Factor \(UGF\) guidance | London City Hall](#)). As part of the evidence base (see list below) work has been undertaken via the Our Rivers Our City study ([Our-Rivers-Our-City-Strategy_Final.pdf \(growgreenproject.eu\)](#)) that incorporates a baseline assessment of a potential Urban Green Factor based on a ward level analysis across the city (see Appendix 2 for an extract from the study). In essence, the baseline assessment provides information on what is the current state of play on an Urban Green Factor. This will inform the development of the policy to consider what level to pitch potential improvements to green infrastructure within the context of the suite of policy asks on development.

- 3.11 This could include how the planning system can help mitigate the effects of urban heat islands (which can be formed when vegetation is replaced by hard surfaces, buildings and other structures necessary to accommodate new homes and new jobs). We need to understand how this may contribute to changes in both daytime/night-time temperatures and possibly air pollution in Manchester and managing heat risk and measures to mitigate this is linked to the work we are doing in relation to the urban green factor. Some of the measures which could help deal with the heat island effect are already in place, for example increasing tree coverage and negotiating green roofs, but we need to understand more the impact and what other aspects of development, such as materials on buildings and hard surfaces could play in this regard.
- 3.12 To inform the development of policy in this regard, there are several studies that have been completed or are in the process of gathering evidence to support the local plan. The evidence base will include the following:
- Our Rivers, Our City (completed winter 2021)
 - Biodiversity Strategy (completed autumn 2022)
 - Tree Opportunity Mapping
 - Open Space Study (near completion)
 - Net Zero new development (Updating previous commissioned work)
 - Housing Needs Assessment (commissioned)
 - Biodiversity Net Gain (GMEU study nearing completion; Manchester study commissioning)
- 3.13 The Places for Everyone joint local plan is nearing the completion of hearing sessions as part of the examination of the plan. There will be a further round of formal consultation on any proposed changes (main modifications) to the plan later this year; followed by adoption of the plan by individual full councils of the constituent local authorities. While addressing climate change is fundamental to the plan as a whole and integrated across policies, policies in Places for Everyone which have specific references to climate change or carbon emission reductions include:
- JP-S 1 Sustainable Development
 - JP-S 2 Carbon and Energy
 - JP-S 3 Heat and Energy Networks
 - JP-S 4 Resilience

- JP-S 5 Flood Risk and the Water Environment
- JP-S 7 Resource Efficiency (n.b. policy proposed to be deleted as part of the PFE Examination with clauses added into other policies in the plan)
- JP-J 1 Supporting Long-Term Economic Growth
- JP-G 2 Green Infrastructure Network
- JP-G 5 Uplands
- JP-G 7 Trees and Woodland
- JP-G 9 A Net Enhancement of Biodiversity and Geodiversity
- JP-P 1 Sustainable Places
- JP-P 2 Heritage
- JP-C 1 An Integrated Network
- JP-C 4 Streets for All
- JP-C 6 Freight and Logistics
- JP-C 7 Transport Requirements of New Development

Delivering Climate Mitigation and Adaptation

3.14 Paragraphs 3.3 to 3.5 and section 4 provide examples of specific benefits that development delivers in terms of carbon standards for new build homes, flooding mitigation and heat island mitigation. Other key tools that support planning policy include the Green and Blue Infrastructure Plan and the Manchester Tree Action Plan 2016-20. This work is an essential component of creating a climate resilient city and these plans are integrated as actions under Manchester's Climate Change Action Plan (MCCP). Key projects to highlight in this report include:

- The Sponge City approach developed in the West Gorton Community Park;
- Work underway in the Victoria North area to bring forward a River City Park; and
- Tree planting by the City Council and other organisations (e.g. City of Trees) that contributes directly to the provision of shading and mitigating urban heat effects.

3.15 A full update on the work undertaken through Green Infrastructure will be presented to the scrutiny committee in March.

Levelling-up and Regeneration Bill: reforms to national planning policy

3.16 Government published proposals under the auspices of the Levelling-up and Regeneration Bill (LURB) (reforms to national planning policy) on 22 December 2022. The consultation seeks views on the proposed approach to updating the National Planning Policy Framework. It also seeks views on the proposed approach to preparing National Development Management Policies, how this might develop policy to support levelling up, and how national planning policy is currently accessed by users. The consultation is split into two main parts – information and 58 questions about the proposed changes emerging from the LURB; and a tracked changes version of the proposed next iteration of the NPPF.

3.17 The proposed changes to be introduced via the LURB can be summarised as follows:

- Around half of the consultation questions focus on housing issues with key proposals around five-year land supply; housing requirements in local plans; and changes to the Housing Delivery Test (HDT);
- A number of other specific housing related matters covering:
 - Social rent – the govt intends to change the NPPF in the future to give greater importance to social rent. It is looking at widening the definition of affordable housing for rent for example to include community-led developments;
 - Encouraging development on small sites;
 - Developer accountability – looking at making applicants’ past “irresponsible planning behaviour” either a material consideration when the LA is determining planning applications from them in the future or allowing LAs to decline to determine future applications from these applicants. The govt is asking for views on what types of behaviour would be in scope for this;
 - Monitoring of build out progress on sites; and
 - Consideration of an ‘alignment policy’ which will look at replacing the Duty to Cooperate mechanism.
- Includes additional wording in the proposed change to ensure that food security considerations are factored into planning decisions that affect farmland; and
- Enable new methods for demonstrating local support for onshore wind development.

3.18 Alongside these specific changes, the consultation calls for views on a wider range of proposals, particularly focused on making sure the planning system capitalises on opportunities to support the natural environment, respond to climate change and deliver on levelling up of economic opportunity, and signals areas that are expected to be considered in the context of a wider review of the Framework that will follow Royal Assent of the Bill. The government will consult on the detail of these wider changes next year, reflecting responses to this consultation.

3.19 Chapter 7 of the consultation proposals focusses on climate change and biodiversity (questions 37 to 40). Biodiversity Net Gain (BNG) is highlighted noting the statutory status of proposals enshrined in the Environment Act (2021) including the requirement to demonstrate at least 10% biodiversity net gain on all development sites, other than a small number of exemptions. The Act also introduced new Local Nature Recovery Strategies, which will map important habitats and areas for nature recovery and enhancement. In Manchester work is well advanced on understanding the implications for delivering BNG from development (evidence base for the Local Plan noted in paragraph 3.11). Moreover, Greater Manchester authorities were one of the initial pilots to develop a Local Nature Recovery Strategy. The work already undertaken will prove invaluable for the preparation of the emerging Local Plan by providing additional evidence to supplement the specific work on BNG.

3.20 Chapter 7 also asks about a specific aspect connected to climate change, namely the use of carbon assessments. The consultation states,

“There have been calls to embed a broad form of carbon assessment in planning policy, for example that could apply at local plan-level or could cover emissions that result from locational, design, travel and development choices. However, evidence on their operation and impact, and how local authorities take action on the results, is not clear cut. We are interested in whether effective and proportionate ways of deploying a broad carbon assessment exist, including what they should measure, what evidence could underpin them such as Local Area Energy Plans, and how they may be used in a plan-making context or as a tool for assessing individual developments. This will inform a further consultation on national planning policy in due course.”

3.21 The climate change aspect of the consultation also picks up about flood risk management. The consultation states,

“...the government has commenced a review of the case for implementing Schedule 3 to the Flood and Water Management Act 2010 concerning Sustainable Drainage Systems (SuDS). The review will ensure that the commencement of Schedule 3 in England will support the objectives of alleviating pressures on the sewer network and reducing flood risk, as well as improving water quality, amenity, biodiversity, and rainwater harvesting. If implemented, this Schedule would introduce standards for new sustainable drainage systems as well as making connection to public sewers conditional of approval that the drainage system meets the national standards. government will update on the outcome of this review shortly.”

3.22 The final aspect of the consultation sets out the envisaged role for National Development Management Policies (NDMPs). The consultation states that

“These are intended to save plan-makers from having to repeat nationally important policies in their own plans, so that plans can be quicker to produce and focus on locally relevant policies. National Development Management Policies should also provide more consistency for small and medium housebuilders, who otherwise must navigate a complex patchwork of similar but different requirements.”

“Stakeholders have suggested that planning policy should address other climate risks identified in the third Climate Change Risk Assessment, such as overheating and water scarcity, and that it should help put more focus on nature-based solutions and multi-functional benefits. This would be beneficial for ensuring future development is resilient to changes in climate, beyond the role of building regulations. For example, the provision of green infrastructure in new development can aid climate change adaptation and improve resilience to extreme weather events.”

3.23 The intention is that National Development Management Policies are set out separately from the National Planning Policy Framework, which would be re-focused on principles for plan-making. This consultation calls for views on how

to implement NDMPs and the government will consult on the detail next year ahead of finalising the position.

- 3.24 Appendix 3 of this report provides further details on the consultation with a broad outline of the response proposed by the city council.

4.0 Planning Application process and permitted development

Planning Application Process

- 4.1 As noted above there is an existing policy framework which seeks to address climate change. This provides a platform for covering environmental issues when considering spatial land use matters. However, with increasing concerns, the planning process in Manchester has sought to do more in advance of any policy change (both at a local and national level). A previous report advised that all major planning applications are already required to be accompanied by an Environmental Standards or Energy Statement (part of the local validation checklist noted above) which set out the design intent for the scheme as well as the commitment to aligning with City Council aspirations and desire to deliver sustainable development. The carbon reduction strategy would also be set out within this document.
- 4.2 Amendments were made to the Building Regulations Approved Document Part L (Conservation of Fuel and Power) in 2021. This outlines the requirement for reductions in carbon emissions required for new developments; each scheme that requires planning permission is also now required to show how the development would perform against the requirements set out within those Building Regulation standards.
- 4.3 The submitted information would usually outline how the development would meet the Energy Hierarchy principles to make the fullest contribution to minimising carbon dioxide emissions in accordance with the following principles:
- Be Lean: use less energy
 - Be Clean: supply energy efficiently
 - Be Green: use renewable energy
- 4.4 Be Lean – this usually relates to a fabric first approach in reducing energy demand/consumption and the following lists typical issues addressed:
- Improvements to the performance of the building fabric
 - Promotion of daylight to reduce lighting loads
 - Natural ventilation and incorporating heat recovery technology in the building core
 - Low energy lighting
 - High Efficiency Plant such as air source heating/cooling systems
- 4.5 Be Clean – The aim is to secure improvements to ensure that the energy required is sourced from low-carbon technology and demands are met as

efficiently as possible. If available heat networks can be utilised to provide heating and hot water to a development in an efficient manner. Opportunities can also be realised to include combined heat and power systems which allows for production of electricity from unused heat. Where this is not possible clean measures should be introduced which reduce carbon emissions.

- 4.6 Be Green – this involves looking at how renewable technologies could be used to further reduce the carbon footprint; for example through biomass boilers, solar water heating, ground source heat pumps, air source heat pumps and solar PV.
- 4.7 A whole life carbon analysis is to be sought for any major planning application with an expectation that this goes beyond the requirements of the current Core Strategy to contribute towards the City's Net Zero Carbon target. The request is that this includes how the development proposed would reduce the impact on the environment, including, water-consumption, sourcing materials, energy monitoring and efficiency. A full materials review should be included regarding embodied carbon aimed at reducing the environmental and social impact, wherever possible this should include responsible sourcing of materials.
- 4.8 In addition to the above, we will always engage with developers to negotiate car parking levels and the optimum number of safe secure cycle spaces. It is acknowledged that car parking can be a challenging issue, the tension being how much to address concerns of there not being enough to minimising the amount in sustainable locations and reducing reliance on private vehicles. Where car parking is proposed, not only are the physical impacts of such spaces assessed including visual appearance with screening by landscaping and trees, permeable surfaces etc, but measures are encouraged for alternative means of transport.
- 4.9 This negotiation also involves electric charging points and the type of charging points to be installed. This would usually involve fast charging points, as well as the infrastructure, for any required additional points in the future.
- 4.10 Every planning application is checked before being registered in order to determine which flood zone it is within and whether the site is also within a critical drainage area. Dependent on the location, the proposal must be accompanied by the correct level of information relating to drainage, including where necessary, a flood risk assessment. For example, any development within Flood Risk Zone 3 (the most vulnerable location) or meets other criteria such as the size of the application site, would need a fully detailed Flood Risk Assessment. Those applications within the most vulnerable areas are subject to consultation with the Council's own Flood Risk Management Team and the Environment Agency. Where permission is granted, conditions will ensure that drainage is carried out in accordance with the approved details.
- 4.11 Key to negotiations is working with developers for the best possible approach to drainage including investigating where a sustainable urban drainage system (SuDS) could be incorporated. SuDS aim to control surface water run-off at source by storing it locally through collection and cleaning before water is

released back into natural watercourses; relieving pressure on sewer systems and reduce the risk of flooding by replicating a more natural process to manage flow rates. Their benefits include improving water quality by capturing and retaining any harmful pollutants and reduce the risk of polluted water entering watercourses. The type of drainage system appropriate for any development is subject to careful and full consideration taking into account National Guidance.

- 4.12 Tree removal and tree replacement is also a matter that is often highlighted through the planning process. Tree loss is regrettable but there will be many reasons for this. Many sites coming forward for new homes or businesses creating new jobs in Manchester are brownfield and previously developed. With time they will become home to self-seeded vegetation and trees. Notwithstanding this, a trees age and condition will always be assessed, and any loss balanced against the delivery of other key council objectives. What is important is how tree loss can be mitigated and where.
- 4.13 In advance of the mandatory 10% biodiversity net gain being introduced, the service is also working with GMEU and colleagues across the Council to secure an uplift wherever possible.

Permitted Development

- 4.14 Not all development requires planning permission from the local planning authority. Over recent years the Government has increased permitted development rights both for homes owners/occupiers and businesses; in such cases a local planning authority has no control or influence over the standard of development or what it should address.
- 4.15 These permitted development rights cover changes of use, extensions and other external works. An example is the paving over of front garden areas; we are aware this is a concern and is often reported to the planning service for investigation. For clarity the legislation only requires permission being sought for front gardens and only where there is no provision to deal with water run off onto the highway. This significantly impacts on any action that can be taken. It is noted that many house extensions including such structures as conservatories and outbuildings do not routinely require the submission of an application for planning permission. Again, this impacts on the control available through the planning system in relation to the environmental performance of these structures and how they compare to the main host building.
- 4.16 Even where a prior approval is required for certain changes of use (and this includes changes of use to residential) there is no provision for a local planning authority to consider environmental impacts, despite this being raised before amendments to the legislation was made.

5.0 Recommendations

5.1 The Committee is recommended to:-

(1) To consider and comment on the current and emerging planning policy approach that seeks to address climate change; and

(2) To consider and comment on the proposals set out in the consultation on updates to the National Planning Policy Framework (NPPF) expected this Spring; and potential future changes to NPPF via the Levelling Up and Regeneration Bill.