

Just Transition Wakefield – formal response to Wakefield Council’s Climate Change Action Plan

Just Transition Wakefield welcomes Wakefield Council’s Climate Change Action Plan as a significant step forwards towards the council’s goal of net zero by 2030. We recognise that this is a significant commitment, and are reassured that council leadership at both political and officer level is clear and focused. We also welcome this, and as part of this leadership, the creation of a dedicated Climate Change Team.

We are encouraged and recognise the spirit of openness that the council are demonstrating in engaging with us and other community groups, and seek to develop this further into a highly constructive relationship where robust conversations can happen in a spirit of mutual interest, support and constructive criticism.

We recognise that this plan is a working document and will see much change over its lifespan. However, there are specific areas where we think improvements must be made. These are highlighted below in order to keep the improvement of the plan at the top of the agenda within the council.

1. Use of language

We feel that the growing urgency of the climate emergency requires that the language of zero carbon is used in preference to low carbon. We have heard the technical argument for this, and whilst we understand it, we still feel that it is unhelpful to the wider public understanding of urgency. In layperson terms, “How is this an emergency if we are only aiming for low carbon solutions?” It may be that the action plan can be split in future iterations into a public, lay summary where language is clear and simple to explain political intent; supported by a technical plan where language is more precise to reflect such things as embodied carbon.

At present, the plan reads as if we are trying to achieve net zero through the adoption of low carbon technologies.

We also feel that a clearer statement could be added: that to be effective, the plan must inform every aspect of council activity.

2. Indicative Programme Timescales

We found this section to be unhelpful in understanding the detailed work the council will undertake over the 10 year timescale.

The use of the coloured blocks is unhelpful. The very first row of the plan suggests that work completed in 2018 and 2019 is undone in 2020 and then not done from 2021 onwards. We are sure this is not the case...

More typically, the blocks show work not started for years, when in actual fact they are not planned. Others show as red and then stop again, suggesting they will not be implemented!

In addition, many of the strands are not detailed actions, targets are not smart or able to be monitored as they are written. This section would be more helpful as a separate document with more detail highlighting targets, milestones, monitoring, success criteria – and of course planned dates to start planning/implementation/completion to enable more effective scrutiny.

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3. Workstream 1: Low Carbon Estate

It makes sense that this is one of the first workstreams, because it will be most visible to council employees, and therefore will support leadership of the required organisational culture change.

Our ambition

To reduce the consumption of energy across our council buildings and ensure they are as energy-efficient as possible, with the added intention of reducing utility costs for water, electricity, and gas.

It would be helpful to readers to see in straightforward terms how this can lead to zero carbon or even net zero, to make it clear how this workstream contributes to the overall plan.

Surely the ambition should be as written, but should go on to say: *“By 2030, all council run buildings will be zero carbon in operation with no reliance on fossil fuels. This will include LA maintained schools and community buildings as well as council buildings. Where it has not proven possible to fully transition by 2030, there will be a clear explanation of the barriers along with the timescale and investment required to achieve zero carbon in operation.”*

It would also be helpful to share with council tax payers and employees regular metrics on progress to include investments made, savings made, carbon emissions reducing over time. Again, this will build on the work being done to ensure acceptance and buy in from all stakeholders.

The detail of the workstream could go further to detail a switch to a zero carbon electricity supplier, and rather than reducing the reliance on gas, ending the reliance on gas. There will be opportunities to achieve this within the 10-year timescale, particularly if district heating from minewater resources can be developed. Stakeholders need to understand how each project within the workstream will lead to zero carbon in operation or net zero. For example, LED street lighting needs a zero carbon supply. This could be achieved through solar panels integrated into each lamppost, a zero carbon supplier such as Good Energy or Ecotricity, or from the council’s own energy parks via a storage network. It would be clearer if this were explained.

4. Workstream 2: Low Carbon Fleet

Our ambition

To embrace the best technologies and create suitable infrastructure to allow all of the council’s fleet vehicles and plant to be converted and/or replaced with ultra-low emission vehicles (ULEVs) by 2030.

We feel that final clarity would be achieved with a statement along the lines of *“This will allow us to be carbon neutral in the operation of our vehicle fleet.”*

Again, this allows you to park the embodied carbon from the production of the equipment which will still be in transition itself, but allow the council to be clear in where it achieves the aims of net zero.

The feasibility for hydrogen refueling shows ambition to work with developing technologies, but could perhaps reflect a wider range of technological

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solutions for heavy vehicles, such as EVs, biofuels, etc, with decision points included in the action plan. It is reasonable to recognise that this is a developing field and best available technologies are not yet pulling ahead of the competition.

5. Workstream 3: Renewable Energy

Our ambition

To self-generate our own renewable clean energy and embrace technologies to store and utilise any excess power that is generated.

We feel that this could read *“To generate enough renewable energy ourselves along with creating appropriate energy storage facilities to enable us to operate entirely on our own zero carbon energy.”*

We also feel that this strand could be strengthened to include support for and integration of other community and business led renewable energy projects to integrate with workstream 6.

The use of renewable gas from biodigesters is important to reduce emissions from collected waste, but attention needs paying to accounting for these CO₂ emissions so that this energy stream can also operate as a zero carbon system. It also needs to be clear that this potential is met only through genuine waste and residue that cannot be used elsewhere. For example, this would exclude woodchip that should go back to the soil.

6. Workstream 4: Carbon Offsetting

This is possibly the most controversial part of the plan, even though it is likely to be critical to achieving practical zero carbon in operation. In other words it can make the difference between not achieving zero carbon and achieving net zero. This precision may be lost on some lay readers, but we feel that more attention needs to be paid to this to ensure proper transparency.

Our ambition

To invest in and deliver high quality projects to compensate for the residual carbon emissions left behind once the council has exhausted all other options to avoid, reduce, and substitute emissions.

Furthermore, aside from the carbon benefits, this work intends to help to green the district’s landscape by increasing tree canopy cover, whilst also providing flood alleviation, improving amenity and recreational opportunities, supporting a sustainable forestry industry, and promoting mental wellbeing and physical health through greater access to green space and re-connection with nature. Our goal is to also use any offsetting to address the ecological crisis by providing bigger, better, and more joined-up habitats for wildlife, which is vital in the fight to reverse biodiversity loss.

As a group, we have concerns about the legitimacy of carbon off-setting, and sincerely hope that by the success of the plan in 2030, this debate will have moved on through technological and policy development.

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However, inasmuch as it forms part of the council’s plan, we feel that it could look further than reforestation, such as sequestering carbon in soils through improved management, particularly on council owned land but by also encouraging farmers and landowners to develop their own soil management practices, and sequestering carbon through peat bog regeneration in partnership with neighbouring authorities.

We also feel that urban greening could be emphasised here as adaptation strategies, if not adding an additional workstream for adaptation.

Irrespective of Gold Standard certification, we are uncomfortable with overseas offsetting projects for a number of reasons, not least is the self-determination of (often exploited) host communities. These are not impossible, but higher standards of evidence and governance will be required before embarking on any such schemes as an absolute last resort.

7. Workstream 5: Behaviour Change and Influencing

This workstream is critical to the success of the plan. If the council’s climate change ambition and policies are to integrate through all council activities, this is the one barrier to success that needs addressing first – the ability that people have (sometimes deliberately, most often accidentally) to ignore, undermine and otherwise subvert organisational best intentions. We feel it should come higher up the list of workstreams – probably as Workstream 1.

Our ambition

For all employees and elected members of the council to understand the climate change emergency and be responsive to this within their day-to-day actions, decisions, and longer term visions and plans for both internal services and the district as a whole.

And furthermore, for interventions to be made into appropriate procurement processes to embed carbon reduction in 3rd party service delivery, and for existing supply chain partners to be engaged with to help us achieve the same goal.

We would also like to see explicit plans to integrate climate change into the council’s policies within every portfolio and team. This is critical to ensure that climate change is an integral part of every aspect of behaviour and action by all council employees. A reiteration of this plan informing all aspects of council activity would be helpful in this section.

We would add here that a clearer commitment to zero carbon procurement in all council contracts – including regular purchases like paper and toner, as well as capital spend.

8. Workstream 6: Place: District-wide Net Zero

Our ambition

To create a framework and overarching programme that allows us to influence and ultimately reduce the carbon emissions in the district that we have no or limited direct control over.

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Through conversation, we recognise that you also see this as the weakest part of the plan. However, in order to strengthen it, we suggest the following:

- Engage with other related and public sector bodies to support their journeys to zero carbon. As well as schools (academy and private sector) and Wakefield District Housing, this would include NHS Trusts and the Clinical Commissioning Group, Wakefield College, government agencies such as Job Centre Plus and of course the 3rd Sector;
- Engage private landlords as having the biggest impact on living standards and fuel poverty, critical to achieving a just transition;
- Actively empower local communities through bodies such as Town and Parish Councils, faith organisations, Community Centres and sports associations to enable them to develop their own (supported or self-governing) plans for zero carbon;
- Raise the ambition for advice work to unlock the potential of the private sector and individuals who wish to go further, faster and act as pace-setters;
- Be clear and transparent when central government or regional policy is acting as a barrier to progress, so that effective lobbying can deliver change to the national climate change policy landscape, and commit to working across the region and country to join and lead this lobbying;
- Outreach work needs to be a specific strand within this workstream, to build engagement: firstly with early adopters and pace setters, but ultimately with everyone, targeting those with most to gain such as the fuel poor and marginal businesses where reducing energy costs can increase long term financial sustainability;
- Develop an additional “food and diet” strand to include local farmers and growers, primary and secondary food producers, and the public to create the space for conversations about food sustainability. The Rhubarb Festival 2022 would be an ideal vehicle to kick-off such an initiative.

Because there are so many external barriers to achieving zero carbon, or even net zero within the timescale of the plan, such as

- training for domestic retrofit,
- constructing new build homes beyond the limitations of current building regulations,
- the weakness of planning law,
- Partnership work with regional bodies including WYCA, Leeds City Region, the LEP.

This section of the plan needs to lay the framework to exploit opportunities as they become available, and to identify where lobbying of central government needs to happen, and which partners can support this lobbying. A recognition in the plan of the external barriers, including regulatory ones, will help to build support when progress may appear slow and will aid eventual success through removal of such barriers.

This may be overtly political, but the plan has been driven politically within the council, and this aspect of success cannot be overlooked.