

This document is the formal response from Just Transition Wakefield, to the Wakefield District Local Plan 2036: Planning Growth and Protecting Places.

The document, along with its associated maps, appendices and supporting policies is far too big for a voluntary organisation to do full justice to, so we have concentrated on key policy areas where there are significant failings and areas for improvement. The lack of comment on a section does not imply that we are happy with it.

Our responses are structured to mirror the plan, and so fall under the following headings: Context, Ambition and Vision, Development Principles and Strategy, Strategic Policies and Local Policies. However, we preface our response with the following general observations and comments, and will summarise our comments at the end.

Preface

Just Transition Wakefield recognises that the local plan, the policies that underpin it, the national planning frameworks and the regulations that it must comply with, were all written before Wakefield Council unanimously declared a climate emergency in 2019. We also recognise that the public consultation was delayed to try to build links with Wakefield Council's Climate Change Action Plan as well as because the Covid-19 pandemic disrupted the consultation process.

However, it is clear that the policies and planning frameworks within are not compatible with the goal of net zero by 2030, and cannot be so, because the plan is not aligned to council policy.

The Climate Declaration, passed unanimously by the council in 2019 was for both the council **and the district** to be carbon zero, **in production and consumption, by 2030**. The statement in Paragraph 5.5 (p23) is erroneous and contradicts actual council policy.

On this basis alone, the plan is not fit for purpose and should not be passed to the Secretary of State for approval.

Within the terms of the plan, it is not sound on these grounds:

- **It has not been positively prepared** – The plan is not aligned with council policy, specifically the 2019 declaration of a climate emergency, and the subsequent policy that all council activities, policies and proposals **must** be written with the climate emergency in mind.
- **It is not justified** – The plan does not take sufficient cognisance of the climate emergency declaration, nor the urgency of mitigating action required to address the emergency.
- **It is not effective** – The plan does not meet the climate needs of the district, not in mitigation or adaptation, and adds significant and unreasonable risks to the district's economy and the safety of its citizens.
Furthermore, the full impacts of the 2020 – 2021 Covid-19 crisis could not be reflected in the plan, but urgently need to be. Covid has impacted on local businesses, but particularly the use of town centre office space. To accommodate this contextual change, the plan needs further significant revision.

- **It will not be consistent with national policy** - It is entirely predictable that national planning policies must change within the lifetime of this plan – firstly through any new legislation that follows the Planning for the Future White Paper, and secondly, when central government finally propose effective climate policies. Therefore this plan **must** be framed to be able to respond to regulatory change throughout its lifetime. **Currently, it is not.**

The commitment to a zero-carbon district should be completely embedded in this document and appear throughout in the policy statements and explanation. It should be clearly and unambiguously seen as a fundamental driver of the planning proposals. As it stands, the draft Local Plan 2036 clearly fails to do this, and issues relating to Climate Change do not receive the degree of importance that would reflect the declaration of a Climate Emergency.

Climate should be so central and embedded in the Plan that anyone reading the plan or promoting developments would have no doubt of the need to address environmental issues, with carbon zero being at the forefront of these, in line with stated council policy.

All comments below explain where the plan falls short on key policies.

Purpose

The statement 1.1 is inadequate if the Council's Climate Emergency declaration is to mean anything substantial. Equally, under para 1.2 Scope of the Plan, "Address Climate Change" and "Promote Low Carbon Economy and Technology" gives insufficient emphasis to both their importance and the challenges that face the Council and the District in addressing them.

Context

Urban areas. The traditional role of town centres has been shrinking at an accelerating rate, due to out-of-town shopping and more recently the growth of on-line shopping. Both retail and now office demand have now been very hard hit by COVID. This is leading to ever-greater vacancies and dereliction in the town centres. It may provide an opportunity for much-increased house-building on urban brownfield sites, and the provision of more urban green spaces. These can have benefits to people directly, and to the environment, by planning new housing schemes in a manner that promotes walking, cycling and public transport.

The section reads as pursuing incremental change but both the changing demand for commercial land and the climate emergency require much more fundamental statements of intent with regard to urban planning, and the drafting of guiding principles to support these.

It can also be anticipated that the white paper Planning for the Future will bring new legislation, including the potential for locally agreed design codes. Delay to incorporate this anticipated legislative change makes sense in the current climate. Therefore, paragraph 2.1 must include the flexibility to respond to the planned re-write of planning legislation.

Related Strategies

National.

The plan fails to reference the White Paper Planning for the Future, which threatens to upend the entire planning system. In this failure, it neither protects itself from predictable loss of control, nor positions itself to exploit potential opportunities arising from this anticipated legislation.

Regional.

The West Yorkshire Combined Authority has declared a climate emergency with a target date of 2038. This is not referenced as a key driver of regional policy, nor the forthcoming Mayoral election, which can be expected to shake up regional policy. An equally significant omission is the lack of reference to WYCA's Carbon Emissions Reduction Pathways (CERP) and the associated regional carbon budgets. Without these inclusions, we cannot hope to meet our regional commitments via planning policy. Wakefield's local plan is therefore creating unnecessary future barriers to Wakefield Council's own policy commitments.

Local.

The October revisions reference the Wakefield Climate Change Action Plan (CCAP). However, this plan is not complete and fixed, but explicitly evolutionary as technologies, opportunities and legislation change over its lifetime. Further, its lifetime is only 10 years, and so the Local Plan 2036 should anticipate the increasing pressure to reduce emissions over its lifetime. Further, because the CCAP is evolutionary, but the declaration of climate emergency is not, it would make considerably more sense to tie the local plan to the declaration of fixed outcome, not the changeable policies that will get us there.

Ambition and Vision

The vision needs to be tied explicitly to the climate emergency and zero-carbon, and it needs to be explained why this is being done and how it will affect the Plan and its implementation. There is opportunity here to state the aim of making Wakefield District a leader in the Green Economy. (eg where it says "Wakefield will be a place where all businesses and communities succeed" this sentence could be amended to "businesses contributing to the zero-carbon future . . ." or to "all businesses and communities succeed as zero carbon exemplars, and where people seek political, entrepreneurial and community leadership in climate change mitigation and adaptation.")

Securing "biodiversity net gain" is also too weak. In line with council policies, the vision should be to "utilise every opportunity for biodiversity gain and carbon capture, through planting, through soil management, and through green corridors."

Statements about improved transport infrastructure again miss the chance to talk positively of the benefits of public transport, walking, and cycling as part of a transport infrastructure that both meets people's needs to travel (for work and leisure) and fits within a zero-carbon future.

The vision needs amending to replace "low carbon" with "zero carbon" to state the ambition in the first sentence of the vision.

Development Principles and Strategy

Every principle and strategy must have an explicit climate change reference for this to be the continuous thread through the plan.

For example:

5.1 To contribute to achieving zero carbon by 2030, the Wakefield District Local Plan will embody the Garden City ...

5.2 To promote health and zero carbon transport, Active Design Principles will be utilised to support healthy lifestyles...

The Active Design Venn Diagram graphic omits climate change and zero carbon. This is very telling, and is a clear indicator that working towards zero carbon is not integral to the mindset of the plan's authors.

5.4 This section opens with references to the national commitment to be carbon neutral by 2050, but not the more realistic local commitment of carbon zero by 2030.

However, in paragraph 5.5 it says

"Wakefield Council declared a Climate Emergency in May 2019, has pledged to become a carbon neutral organisation by 2030 and to work towards a carbon neutral district by 2050. The Council has prepared a Climate Change Action Plan to help it achieve this commitment." **This is factually wrong. This error means that the plan's authors have fundamentally misunderstood the council's intent, and the entire plan is therefore unfit for purpose.**

The declaration of climate emergency actually states:

Council therefore resolves to:

1. Declare a Climate Emergency.

2. Pledge to make Wakefield Council a Carbon Neutral organisation before 2030, taking into account both production and consumption emissions.

3. Request that the Council's Cabinet develops and reports back to Council within six months the specific emergency plans and actions needed to reach this target.

4. Support and work with all other relevant agencies towards making the entire area zero carbon within the same timescale.

5. Call on central government to provide the funding and powers to make this possible.

6. Work with other governments (both within the UK and internationally) to determine and implement best practice methods to limit global warming to less than 1.5°C.

7. Continue to work with partners across the Wakefield District and region to deliver this new goal through all relevant strategies and plans

Specific statements have been highlighted. This draft Local Plan is clearly incompatible with or in breach of statement 7.

Since scientists and the United Nations now anticipate that warming of 1.5°C will be breached within the timescale of the Council's Climate Change Action Plan, and certainly within the Local Plan's lifetime, further strengthening is of the Local Plan is required.

We therefore require and insist that the Wakefield District Local Plan be withdrawn, re-drafted and a new consultation is embarked upon.

Development Strategy, paragraphs 5.7 to 5.11.

This section has not seen major revision. It does not take into account developing work within the council on a "Preston Model" approach to localizing the economy, nor to the Doughnut Economics and Circular Economy work that the Council is beginning to develop. As the Council continues to build innovative, integrated economic and climate policies and plans, this Local Plan will become a barrier and a hindrance, instead of an enabler. **It is therefore unfit for purpose and needs withdrawing for further revision.**

Strategic Policies

Policy WSP 1 – Presumption in favour of sustainable development.

Paragraph 1 is weak, and will give developers licence to negotiate to the lowest standards demanded by building regulations at the time. Paragraph 1 should therefore read:

When considering development proposals the Council will take a positive approach reflecting the presumption in favour of sustainable development contained in to work to the highest standards of energy efficiency, sustainable material specification and ecological sustainability on site, wherever possible going beyond the National Planning Policy Framework. It will work proactively with applicants to find the solutions which deliver the highest environmental standards ~~mean that proposals can be approved wherever possible~~, and to always secure development that improves the economic, social and environmental conditions in the area.

Further, a third condition to this policy should be set: unless...

“Granting planning permission would adversely impact on the goal of achieving zero carbon by the target date set.”

Location of Development

This section should have more about the impact of the shrinkage of town centre shopping and office demand, on the availability of brownfield sites in the town centres. There may well be a number of “windfall” sites capable of substantial housing development, and that should be taken into account in the amount of land allocated for housing, or affect phasing. These are referred to – almost in passing – on p.86, point 7.8, as are the benefits this can have for car-free living, but should be made much more of.

So for example, Policy WSP 3: location of development.

WSP 3.a should specify that town centre plans must consider change of use to reflect changes brought on by Covid-19, changes in retail and work patterns, as well as the requirement to create healthy, sustainable, safe and socially equitable communities within town and city centres. This would enable shrinking of the retail footprint within Wakefield City Centre, and the subsequent creation of sustainable (in every sense) communities with homes, leisure, retail, public space all contributing to climate change mitigation and adaptation as well as social and economic outcomes.

WSP 4: Safeguarded Land.

Whilst it states that *Permanent development on safeguarded land shall only be considered through the process of preparing and updating the Wakefield District Local Plan*, it also states in the previous sentence that temporary development will only be allowed if it does **not prejudice the possibility of long term development**. This implies that the intention of the plan is to develop safeguarded land, not to safeguard it. The point of safeguarded land must be to safeguard it from development, either to protect its current use, its current landscape or amenity value, or similar. This policy needs clarifying.

We welcome the insertion of WSP 24: Build to Rent Housing. However, we are extremely disappointed that the policy makes no reference to the build and

environmental standards of these homes. Covid has taught us the importance of both private garden and communal green space. Neither of these are specified within this policy. We are very conscious of the intersection of fuel poverty and climate change, and require that these build to rent homes are as close to zero carbon as is possible, if not built to passivhaus standards. The use of hyper-efficient, modular construction should be considered to deliver the quality and affordability of such homes. The requirement for these homes to remain as rented for a minimum of 20 years should enable the payback of any additional costs associated with higher building and environmental standards.

WSP 9: Local Economy

There are many things wrong with this policy.

A few examples include:

1. Calder Park – this whole development is dependent on the motorway commuting, and is designed to facilitate and encourage this. This is incompatible with climate goals, nationally and regionally as well as locally. Therefore, there must be explicit zero carbon, public transport and active transport plans associated with such development sites that are remote from transport centres and hubs.
2. Proposals for new office spaces should be situated within town centres as proposed, but are also encouraged and allowed at Calder Park. This is inconsistent at best. However, this policy must link to town and city centre plans, such as the re-development of historic buildings within centres. (Wood Street Police Station, the Magistrates Court, Unity Hall...)
3. Warehousing and distribution. No-one can deny the importance of logistics to our district. However, no-one can deny the reliance of this industry on unsustainable fossil fuels. Therefore, for this aspect of the policy to have any meaning in the period 2020 to 2036, there must be explicit requirements and commitments to actively facilitate whatever changes are needed to support the decarbonisation of commercial transport. As yet, this could require any or all of e-HGV and e-van charging stations, hydrogen, biogas or other synthetic fuel infrastructure, electrification of the motorway network. Flexibility to adopt new zero carbon technologies must be reflected in the local plan, and requirements on developers to adapt as technology becomes available must be built into site permissions. This goes beyond the requirement for green generation and battery storage facilities.
4. Green generation and battery storage facilities. Every effort should be made, through this local plan and its policies, to require the highest standards of energy efficiency, sustainability of building materials and the integration of renewable generation into all new developments. It makes no sense to plan for thousands of square metres of roof area that does not have integrated solar generation, for example. For this Wakefield District Local Plan 2036 to support Wakefield's climate commitments, and to be future proof, it must make these commitments even if they are currently unenforceable under current legislation. We know that legislation must change over the coming years, and this plan must be written to predict and adapt to such legislative changes.

Para 6.37: it is stated that the Council has commissioned Industrial Land and Office Market Assessments. These will need reviewing in the light of the Covid-19 crisis and its impacts.

Retail and Town Centres.

This is currently a fluid and unpredictable policy area. The Council is developing Town Centre and City Centre Plans, which must respond to the unfolding Climate Crisis, Covid-19, Brexit and recession economic shocks. It is not possible to write coherent policy for town and city centres at this time, and this policy area should be delayed until the impact of these overlapping disasters is clearer.

However, shrinking of city centre retail space, refusing ALL out of town developments, and planning for more mixed uses within town centres and the city centre must be at the heart of plans. The plans within this policy area must integrate with sustainable transport plans, with climate adaptation needs such as minimizing urban heat island effects, sustainable management of storm water run-off, and developing green public space for health and cultural benefit.

The Local Plan 2036 needs rewriting and re-consulting in order to take this uncertainty into account.

WSP 13: Transport Network. WSP 14: Reducing the Demand for Travel.

The focus of this policy is misdirected. The need to move goods in and out of the district is undeniable, as is the importance of the motorway network and the existence of the rail and canal networks. The question for this policy, however, is “How can we support and encourage the transition to zero carbon transport whilst supporting the transition of our local and regional economy to zero carbon?”

With this key question in mind, the policy on roads should become one that has the following objectives:

- No new roads.
- No increase in vehicle movements.
- To focus on maintenance to reduce vehicle wear and tear and associated inefficiencies.
- Any road developments should only be to improve traffic flow to improve efficiency and reduce air pollution, through reducing congestion;
- To enable safe, separate cycle and pedestrian routes that have priority over fossil fuel powered vehicles to encourage modal shifts. Cycling and pedestrian routes should be separate from each other as well as separate from vehicles. They should also take shorter routes, forcing vehicles to divert and should be integrated into junction design to ensure that pedestrians and cyclists can safely use junctions and ideally take priority over vehicles. This is a significant priority shift.

The policy on goods transport must be to encourage the use of the lowest carbon mode at all times, until all transport of goods is zero carbon. HGV routing through and into town and city centres should be discouraged through design, through permit systems as in London, through zero-emission vans into town and city centre shops, etc.

Active and public transport should be encouraged through planned infrastructure developments such as secure, weatherproof cycle parking and charging facilities in town and city centres, linking into commuter routes and transport hubs.

In short, this whole policy area needs rethinking to enable the on-going decarbonisation of transport within and through the district.

Policies on Waste – these are better addressed through other channels.

WSP 20: Community Facilities and Services.

Covid-19 has made many of us very conscious of the need for community facilities within easy walking distance of people's homes. This includes voluntary services as well as commercial ones.

It is essential that they are accessible, and that access to these facilities takes priority over vehicle access and through traffic. Unless it is safe for people to walk to their local shops, they will not. All development proposals must include access to either new or existing community facilities. They must not be outsourced to someone else to provide, and developments should not be signed off as complete until new community facilities (or access to existing facilities) are completed.

Natural, Built and Historic Environment and Climate Change.

This section sums up the failures of this Local Plan. Climate change cannot be an "add-on" – it must be integral, it must run through the whole plan, every policy, as a single, unbreakable thread. Without this, Wakefield Council will not be able to deliver on its clearly stated aim to reach zero carbon by 2030. Even more significantly, it will have no chance whatsoever to bring the whole district with it by 2030 or any other target date. This Local Plan, in its current form, will prevent the attaining of zero carbon. This will be both a political and a policy failure that will be regretted even by deniers when deeper changes hit.

Green Belt Compensatory Measures.

We recognise that to some extent, local planning authorities have their hands tied by national regulation and legislation. However, we believe that the policy should be for a permanent presumption against development in the green belt, so that the test for approval must be significantly higher than proposed. Further, the compensatory measures need strengthening and specifying: to replace one mature tree with one sapling is known to be inadequate in both carbon sequestration terms and wildlife terms, but we know this is the approach developers will take. Therefore the policy must state equivalent wildlife benefits immediately, not in forty years time. This higher bar will upset developers, but will maintain the biodiversity value of the district.

WSP 23: Mitigating and Adapting to Climate Change and Efficient Use of Resources

The printing of the council's climate emergency declaration is less inaccurate than that referenced at the beginning of the document, but it still "conveniently" omits the detail that the work with partners across the district is in the same timescale! To make this error twice must be deliberately misleading.

However, it is our view, contrary to paragraph 6.115, that this plan will hinder the delivery of the council's climate emergency declaration and associated action plan.

WSP 23. We welcome 2b, requiring developments to include climate resilient design, but would like to see this defined in building codes; we need 2c and 2e to be strengthened: in 2c, the extent of the measures should always be maximized and defined; in 2e, the pro-active management of surface water should be required not *promoted*. We know how developers use soft words to circumvent policy, and there should always be the maximum clarity to avoid this.

WSP23/3 – again, the language is too soft, so *encouraging* developers will not lead to universal take-up. This needs strengthening, or we will see yet more brand new houses that need retrofitting to become carbon zero – this is unacceptable.

Local and Site Specific Policies.

All of our general and strategic policy comments apply to the detailed policies within the remainder of the draft local plan. To comment on each of these would be repetitious. The thrust of our objections is already clear.

The principles must be to maximize green space and wild spaces, to work with landowners to sequester carbon in soil and biomass, to retain tree cover and tree belts alongside motorways and at junctions to block pollution drift, whilst insisting on the highest environmental and energy standards attainable within existing law.

Summary

To summarise, our vision for the local plan would be more like this:

This Wakefield District Draft Local Plan is a key element and a key driver of the Wakefield Council Climate Change Action Plan.

Wakefield District will become a hub for green and zero carbon industry, providing high quality jobs with wage structures and training to match. Homes and jobs will be accessed through low and zero carbon transport, with constantly improving facilities and uptake of active and public transport options over the life of this plan.

We aim to attract high tech manufacturing, such as zero carbon modular house manufacture to the district, developing the necessary precision skills within our local construction companies so that we become a centre of excellence in this field. By 2036, we will have complemented our zero carbon new build homes programme with a zero carbon commercial and industrial build programme, and a major retrofit programme to both residential and commercial properties. Through measures such as these, we will have achieved a zero carbon district and be a recognised centre of zero carbon excellence, education and training. We will have realised the ambition of our climate emergency declaration.

Alongside this economic transformation, we will have developed a new ecological employment sector that supports biodiversity growth and carbon sequestration in developments, on farms and in all new tree planting. To enable these transformations, we will maximize the strategic use of funding streams such as the Community Infrastructure Levy and all central government grants. We will work in close collaboration with our neighbouring districts through direct collaboration as well as through the Mayoral Combined Authority, and will work with South Yorkshire neighbours in the same way.

We recognise that national governments may change over the period of this plan, and that the pressures of the rapidly changing climate will require further national and international climate legislation and regulation. This plan is written to enable us to demand the highest environmental standards allowable by law

Just Transition Wakefield: Local Plan 2036 response

at the time, whilst remaining flexible to respond to inevitable further regulatory change.

We trust that you recognise the importance of the changes we require, and the failure of the revisions to the original draft plan to recognise the twin pressures of Covid-19 and the Climate Emergency. We are disappointed that the revisions were made in October, yet failed to adequately address either of these hugely significant and known issues.

Surely the point of the local plan is not simply to follow a wholly inadequate national framework, but to act as the bridge that uses the national planning frameworks and legislation to actively pursue Wakefield Council's strategic objectives? It fails in this objective.

We call on Wakefield District Metropolitan District Council to withdraw this plan, and return with one that is fit for purpose for the challenges of the next 15 years.

Just Transition Wakefield
December 2020.