

Does the Plan set out positive policies for addressing climate change which are justified, effective and consistent with national policy?

1. Policy CC1

1.1 As set out in our representations to the Publication Draft, CC1 and Table 10.1 are essentially supportive, but show the range of other policies in the Plan that will render it ineffective.

1.2 Whilst we have covered some aspects of this issue under Matter 8, we focus here on what 'positive policies' for addressing climate that are justified, effective and consistent with national policy would look like. In NPPF2019 (similar requirements from NPPF2012 are retained), the key paragraphs are:

- 16(b) 'be prepared positively, in a way that is aspirational but deliverable'
- 20(d) '[make sufficient provision for]...planning measures to address climate change mitigation and adaptation;
- 148 'support the transition to a low carbon future [and] shape places in ways that contribute to radical reductions in greenhouse gas emissions';
- 150(b) '[New development should] help to reduce greenhouse gas emissions, such as through its location, orientation and design'.

1.3 The Climate Change Act 2008, as amended by Statutory Instrument 1056, sets a duty to ensure that the UK net carbon must be no more than the 1990 baseline by 2050. This is a legal requirement. West Yorkshire Combined Authority (WYCA) has adopted a net-zero target of 2038, which sets an aspiration that goes beyond the legal requirement, and the Emissions Reductions Pathways (CERP) report that we cited in Matter 8 identifies a number of intervention scenarios that will lead more or less effectively towards the 2038 target.

1.4 In other words, the 2050 target is non-negotiable and the 2038 target represents the collective ambitions of the City Region. We would therefore interpret the 2038 target as 'aspirational but deliverable', and consider the Local Plan 60% reduction target an essential component of that.

1.5 Since the carbon reduction target is such a high-level imperative, we contend that it must be a core target of the Plan alongside its targets for housing and employment growth. Only levels of housing growth, employment growth and carbon reduction that are mutually achievable and complementary can be considered sound and legally compliant.

1.6 The (CERP) report is the best available evidence that is specific to the City Region, and the Plan should therefore be evaluated against its findings. These specifically relate to:



- Absolute reductions in vehicle traffic;
- Absolute increases in walking, cycling and public transport use;
- Carbon sequestration measures, principally through tree planting and peat restoration;
- Retrofitting of the building stock.

1.7 In relation to reducing vehicle traffic and increasing other modes of travel, the strategic policies of the Plan must, when taken as a whole, demonstrate that they offer the optimum scenario for achieving these aims, compare to other tested alternatives for the scale and spatial pattern of development. Unless they can show this, then the effectiveness of CC1 and/or its more strategic equivalent will always be fatally compromised.

1.8 Whilst the Government remains woefully unsupportive of the development management system in terms of requiring and enabling retrofitting, we do consider there is justification for Local Plan policies to set much more ambitious targets for new build, on the basis that if the overall building stock is to progress towards net zero then all new developments must in fact be net-negative carbon as a matter of urgency, unless there are compelling exceptions. This will include, for instance:

- a transformational level of tree planting, net biodiversity gain and other Green Infrastructure measures in all major housing, employment and infrastructure schemes, with evidence-based targets;
- all buildings in masterplanned schemes to be explicitly zero-carbon.

1.9 We therefore suggest that a strategic level version of CC1 is promoted to the SD policies at the top of the Plan, and include the following high-level objectives:

- Use all available means to implement WYCA's net zero 2038 target with reference to the CERP report findings and further evidence as it emerges;
- Achieve transformational reductions in road traffic and increases of sustainable and active travel modes, through a combination of development location and road space re-allocation;
- Achieve transformation levels of tree planting and net gain for biodiversity through new development and infrastructure;
- Use masterplanning to achieve net-zero carbon in all major developments through the remainder of the Plan Period.