

# Wakefield Local Plan Review

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The countryside charity  
West Yorkshire

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## Introduction

CPRE West Yorkshire have reviewed the Publication Draft of the new Wakefield Local Plan, which will set the vision, and the amount and locations of development in Wakefield to 2036.

It's important to give praise where we can, and there are signs that Wakefield genuinely wants to achieve good things. Sections on climate action, adopting the UN Global Goals for sustainable development, and measures to promote healthier, more active lifestyles are welcome. The masterplan for regeneration in Castleford, with strong planning policies to support it, is a model for what could be done in other towns.

CPRE wants to see Wakefield embrace the fantastic opportunity that its countryside offers. 69% of the district is countryside, with an amazing network of wetlands, country parks and wildlife habitats, not to mention cultural highlights such as Yorkshire Sculpture Park and Nostell Priory. We'd like to see a much clearer vision of what this countryside is for: what will it be like by 2036, and how will it be supporting people's lives and livelihoods in a changing climate?

It is not all good news. Wakefield Council proposes to take land from the Green Belt for development in several locations, including large urban extensions of Knottingley and Featherstone. CPRE doesn't accept that the exceptional circumstances to justify this exist. The main reason for this is because the resulting development will be located in places where people will need a car for most journeys, generating traffic and building in another generation of car dependence.

Councils must show that they have made the most of the land within urban areas before they spread outwards, which should include remodelling areas where there is poorly-used land, such as low-density retail with large, surface car parks. In our view, if changing the Green Belt results in unsustainable development, it isn't justified.

By far the worst aspect of the Wakefield Plan is the proposed Ackworth-Featherstone-Pontefract link road. This is a deeply damaging scheme that has no place in a 21st century Local Plan. It will damage landscape and tranquillity in some of the last remaining stretches of open country in the east of Wakefield district. It will slice through the wildlife habitat network in several places, and will inevitably increase pressure for further development along the route in the future. It will also induce significant additional road traffic when West Yorkshire has identified a need to reduce total car mileage by 21% by 2038 to meet climate targets.

In short, we want to see the link road scrapped, and a bolder vision for making better use of urban land – such as the plan that has already been put forward for Castleford riverside – to create walkable neighbourhoods and reduce road traffic. We also want Wakefield to plan *for* its countryside, not just plan *around* it.

Andrew Wood  
Planning Consultant

# Strategic Policy Review

## The settlement hierarchy for the district

The strategy for the amount and location of new development will lead to a further generation of car dependence, when the exact opposite is needed.

We think that all substantial new development should be within a convenient walk of a rail station that has a good service. The settlement hierarchy identifies Hemsworth, Horbury and Ossett for development, but these are much less accessible by rail than the other urban areas in the settlement hierarchy. In particular, Hemsworth has a large apportionment of housing which we do not think appropriate, unless there is a realistic prospect of a new local rail station there. In combination with the proposed link road, private cars will be the travel choice for the overwhelming majority of journeys accessing new development in Hemsworth and this is not a sustainable outcome. In our view, residential allocations in towns without a rail station should be limited to meeting locally identified needs.

Calder Park and Broad Cut Farm site allocations (LP200 and LP1411) are grouped into Wakefield City area for the purposes of the settlement hierarchy. This location is almost 3 miles from central Wakefield, further than Stanley/Outwood which is classed as a separate urban area and has its own rail station.

The definition of 'Wakefield City' in the hierarchy is distorting the level of development directed towards these places, which is likely to generate yet more car dependence.

The proposal for a Special Policy Area at Durkar (LP1411) would locate both housing and an Advanced Manufacturing Park (with hopefully a high employment density) - in a location that will be overwhelmingly accessed by private car transport. This would be an unsustainable pattern of development, which does not therefore justify exceptional circumstances for its removal from Green Belt.

## The Green Belt

Exceptional circumstances for Green Belt change can only be shown if it is clear that the resulting development will produce a demonstrably sustainable outcome. In CPRE's view, any justification of exceptional circumstances for Green Belt change must be based not just on the quantitative provision of land supply for development, but on a suite of sustainability outcomes that those changes would enable. This means exploring all non-Green Belt options to make the most efficient use of land and that compensatory arrangements are made for the harm that results from land being lost from the Green Belt.

Is there an overall need for Green Belt change, and will the specific proposed changes have justifiable and sustainable local outcomes?

CPRE's view on the first question is that residential densities should be optimised. High densities should be applied on sites that can support them, reducing the overall land take needed for housing. The question of justifiable and sustainable outcomes is something that should be resolved at a strategic level, not left to the development management stage

Changes to the Green Belt must contribute to the Plan's strategic objectives as a whole and to NPPF as a whole, not simply be justified on a quantitative basis. For example, a Green Belt change that results in substantial increases in road traffic and/or greenhouse gas emissions is not sustainable, and there is no justification for releasing development land that would enable this type of unsustainable outcome.

The Plan makes successful delivery of over 9,000 homes and almost 300 hectares of employment land contingent on resolving very substantial sustainability challenges relating to specific site allocations. In our view these cannot be separated from the question of whether exceptional circumstances exist to change Green Belt boundaries. The Plan must be able to demonstrate that all these issues can be resolved, because otherwise the Green Belt changes come with an unacceptable risk.

The Plan needs an additional policy - the Green Belt Enhancement Strategy, a Supplementary Planning Document that integrates the Green Belt's role in fulfilling ambitious programmes for wildlife habitats, accessible open space and responding to the climate emergency. This will stop compensatory measures for any loss of Green Belt being delegated to planning application stage, and create clear strategic directives.

Green Belt boundaries should only be changed if it:

- would not harm the purpose of the Green Belt;
- would deliver a net beneficial outcome to the social, environmental and economic objectives of sustainable development.

## Travel & Transport

The West Yorkshire Emissions Pathways report's recommendations include some measures that the Plan can impact, including a reduction in car mileage of at least 21% by 2038, a 20-fold increase in cycling and 80% increase in walking.

We strongly object to investments in a highway network designed for increased private car travel. Any investment should focus on improvements for all road users, without increasing the capacity for vehicular traffic. Schemes should reallocate road space in favour of buses, cyclists, pedestrians and those with mobility impairments. As such, the Ackworth-Featherstone-Pontefract Link Road has no place in the Plan.

Creating the opportunity for a 'modal shift' means making cycling and walking viable alternatives to car travel for work, shopping and everyday travel. Recreational use of cycle, foot and bridleways is not the same as active travel. Canal paths and disused railway lines are significantly less used by women than men due to personal safety perceptions, and have many barriers for people with disabilities. This is a key reason why re-allocating and re-prioritising the use of public highways is necessary to promote active travel.

CPRE supports the principle of 20-minute neighbourhoods.

We recommend a map of the district that identifies a deficit of basic local retail within an 800m walking radius, and the creation of a policy intervention to remedy this.

Changes like this can support active travel choices.

The Wakefield Plan-wide Transport Assessment is not yet published, which is of great concern. It means that proposed site allocations have reached this advanced stage without key transport evidence being available.

In its absence, we have extrapolated from equivalent work in Calderdale. In that report, the National Road Traffic Forecast (NRTF) projected a 20% growth in car traffic and a 29% growth in light goods vehicle traffic over the period 2014-32.

That is a car traffic growth rate of 1.11% per year, and if that continued to 2038 there would be a 30% growth in road traffic 2014-2038.

If this represents a 'policy-off' scenario, then the Local Plan's 'policy-on' scenario for roads actually needs to contribute to achieving around a 40% reduction in mileages over the Plan period, compared to the forecast baseline.

Whilst this will no doubt be a difficult challenge, it is nevertheless necessary, and all possible measures must be taken to pursue it.

To align with NPPF para 148 and the West Yorkshire Emissions Reductions Pathways report, the Plan should set strategic targets for:

- quantitative reduction in private car mileage (e.g. 20%);
- quantitative increases in walking and cycle as a share of journeys/mileage;
- road-space reallocation measures to achieve these outcomes.

## Housing Standards



The Plan should be much bolder and more specific about how it will fulfil the requirement of NPPF 148<sup>1</sup>. In our view this is also necessary for the Plan to be legally compliant in relation to the Climate Change Act 2008.

There are no obstacles to the Plan specifying that development of allocated sites should deliver a net-zero or net-negative carbon impact. We believe the Plan would not be sound unless the net impact of development taking place in accordance with the Plan cannot be shown to achieve radical reductions in emissions on a Plan-wide basis.

Government has not supported planning to go significantly beyond Building Regulations in the need to install renewable energy in homes (either retrofitted or for new homes). This is disappointing, but the Plan must do the most that it can.

This can be partly achieved through development management policies, by specifying that the Council's Climate Change Action Plan is a material consideration; and partly by net impact requirements for allocated sites. We strongly support the exemplary policy WLP31 which lays out expectations for sustainable construction and efficient use of resources, and commend the Council for showing leadership in this matter.

## New Tree Planting

The Plan can make a major contribution through green infrastructure policies and strong links between new built development and new green infrastructure. In particular, we believe the following actions are within the scope of the Plan:

- Requiring ambitious tree planting or equivalent sequestration measures on- or off-site as condition for all major developments (work by University of Leeds finds that this should be in the order of 11 large species trees per new dwelling);
- Identifying a strategic, district-wide approach to how all development will produce net gain for biodiversity, using the Wildlife Habitat Network as the basis.

For planning to contribute properly to climate action, and to fulfill the expectation in NPPF 148 to shape places to secure radical reductions in greenhouse gas emissions, then all new development (residential/commercial/mixed-use) must provide five key outcomes:

1. net zero/negative carbon;
2. net gain for biodiversity;
3. net gain for walking and cycling as modal share;
4. net improvement to flood risk;
5. net gain for access to green/open space.

1. With reference to the [Wakefield Climate Change Action Plan](#), and the [West Yorkshire Emissions Reductions Pathways report](#)

## Housing Density



We welcome the inclusion of a minimum density policy, but there is ample evidence that net neighbourhood densities need to be at least 45-60dpha in order to support sustainable development.

This density supports viable public transport and local, walkable shops and amenities. New development should therefore be configured to increase the average density of neighbourhoods.

Good design is the key to ensuring higher densities do not lead to a cramped built form. This is one reason why masterplanning and design briefs are so important.

With a greater focus on rail accessible locations, we would also expect this to reduce the need for greenfield land allocations to meet housing supply.

## Affordable Housing Needs



The Housing Market Assessment update 2019 (p.13) states that “Analysis assumes that 1,400 dwellings would be built each year and overall 70% are market and 30% are affordable subject to viability.” And that (p.14) “A minimum of around 20% of new dwellings to be affordable across the district is recommended.”

This implies that 30% is the general expectation, but that this could be reduced in some instances on viability grounds so long as the average remains at least 20%.

However, the policies map shows only a handful of housing site allocations within value zone 1. Many of the largest allocations (Castleford, Knottingley, Featherstone, Normanton and South Kirkby) are in zones 3 and 4, where 0% to 10% affordable housing requirements are proposed. It is difficult to see how a District-wide average of 20% to 30% affordable housing provision can be achieved.





# 'Hotspots' & Strategic Masterplanning

In preparing our response to the Draft Plan, we identified and surveyed specific site allocations and proposals which we considered to be of particular interest and/or concern to CPRE. These 'hotspots' are as follows:

- Knottingley/Ferrybridge extension: LP775, LP177;
- Ackworth-Featherstone-Pontefract Link Road and associated site allocation: LP11;
- South Kirkby: LP764;
- Calder Park and Broad Cut Farm, Durkar: LP200, LP1411;
- Castleford regeneration: LP208;
- Wakefield East: LP551.

There are references to masterplans for each of the sites, which we support as an important step in the process. However, there is huge variation between the sites in how it is referenced.

We would expect each of the Special Policy Areas to have a Masterplan Framework, and that development should accord with it. A timetable is needed for masterplanning, with community engagement, before any planning applications can be determined. This will also have a bearing on the delivery trajectory.

It does not appear that masterplanning is well-integrated into the plan-making process, and there is little evidence of a participatory process with all stakeholders, which is a serious omission.

We estimate about one-third of all the development allocations indicate significant issues for ecology, water management, transport and air quality. Therefore how they are developed and how their impacts are mitigated need to be planned in an integrated way that all stakeholders can evaluate.

In our view, the strategic element of the Local Plan needs to incorporate a 'master masterplan' that expresses how the Special Policy Areas and other major development sites will work together to produce strategic outcomes. This should be an additional, high-level strategic policy.

The RTP1 Practice Advice Delivering Large Scale Housing (2019) recommends that a masterplan should be:

- Visionary: raising aspirations and providing a vehicle for consensus building and implementation.
- Deliverable: it should take into account likely implementation and delivery routes;
- Fully integrated into the land use planning system: while allowing new uses and market opportunities to exploit the full development potential of a site.
- Flexible: providing the basis for negotiation and dispute resolution.
- The result of a participatory process: providing all the stakeholders with the means of expressing their needs and priorities.
- Take strong consideration of the role, function and form of new neighbourhoods.

## 'Hotspots' & Health

In all of the hotspots CPRE has identified, the site assessments refer to “mitigations required to accord with the West Yorkshire Low Emissions Strategy”. Policy WLP54 requires the design of development to support access and active travel; and WLP64 notes that “air pollution from traffic is also an increasing problem”.

The West Yorkshire Low Emissions Strategy (WYLES) contains the following headline statements:

In West Yorkshire, 5.1% of all deaths (1 in 20 deaths) are caused by exposure to particulate air pollution with up to 6% in some local authority areas;

Motor vehicles are now the most significant contributor to poor air quality in West Yorkshire and around the country;

Air quality shouldn't be considered in isolation as an issue that can be purely addressed by reducing emissions through technical fixes (newer engines) and restrictive practices (low emission zones), it needs to also be seen as an opportunity to encourage people to change their behaviour and become more active. 20% of people in West Yorkshire are physically inactive so decreasing vehicle use, particularly for short journeys, both reduces air pollution and allows us to incorporate physical activity into our normal daily routine;

Creating a place where people feel that public transport and active travel are the best and easy choice and where the remaining vehicles emit less pollution will improve our health, our cities and our environment and make West Yorkshire a better place to live and invest, thus creating “good growth” for the region.

This issue cannot be left to the development management stage. It is correct that a developer should be expected to provide appropriate mitigating measures at planning application stage, but against what baseline are they aiming to mitigate? If a pattern of car-dependent site allocations accompanied by relief roads and link roads has been adopted in the Plan, then a significant increase in road traffic is ‘baked in’ to the Plan and an applicant cannot be expected to mitigate that. These additional impacts - as well as climate impacts - are therefore the Plan's responsibility in the first instance.

The WYLES (para 5.6) emphasises that tackling traffic-related air pollution is only part of the issue. Health impacts of inactivity, arising from car dependence, are potentially greater than the impacts of air pollution, and significant increases in active travel would bring huge physical health benefits as well as promoting vibrant local economies and community cohesion. The health impacts of the Plan must be addressed by simultaneously achieving absolute reductions in car mileage and absolute increases in active travel.

The Plan as drafted cannot possibly achieve this, because the proposed pattern of development is road-dependent. A major re-think of the location of the site allocations, or at the very least how they are accessed, is urgently needed.

## ‘Hotspots’ & Green Space

The site assessments collectively do not appear to consider the issue of open space, green space and public realm within the employment areas, only the residential areas. This implies that there is no place-making or urban design agenda for the employment areas, which we consider to be a significant omission from the Plan.

Policy WSP22 refers to using design “to create active and healthy places”, and it is just as important that people have good places to work in as to live in - and this is especially important if people are to make healthy, active travel choices when going to work.

## ‘Hotspots’ & Water Management

All but one of the hotspots have substantial parts within flood risk zones 2 or higher, and/or have localised flooding issues.

On the one hand this risks putting a significantly greater amount of development in Wakefield into areas of flood risk. On the other hand, it could represent an opportunity to use new development as a strategic intervention in floodplains, so as to reduce net flood risk. This latter approach mirrors the exception test, in that a suite of sustainability benefits could be demonstrated that would be enabled through these developments. At present this is not achieved: WSP23 requires all new developments to include resilient design, but this is likely to be interpreted only as mitigating flood risk to the development itself and/or its immediate surroundings, rather than as a strategic matter.

Net reductions in flood risk should be a key strategic objective of the plan, and any site allocation that is partially or fully within flood risk zones 2 or higher should be able to demonstrate compatibility with that objective.

## ‘Hotspots’ & Roads

The proposed Ackworth-Featherstone-Pontefract link road is a deeply damaging scheme that does not have a place in a 21st century Local Plan.

Cutting through two areas where the Green Belt is maintaining openness between settlements, it will damage the landscape and tranquillity around Constitution Hill, and between Ackworth and Fitzwilliam Country Park. It will slice through the Wildlife Habitat Network in several places.

It will inevitably increase land use pressure for further development allocations along the route in the future, with a permanent, long-term loss of Green Belt function. When taken cumulatively with the HS2 route, two of the most significant tracts of open landscape in the eastern side of the district will be irreversibly damaged.

For Broad Cut Farm (LP1411), the site assessment says that “the developer is required to demonstrate that a suitable access from the adopted highway can be secured that will not impact on highway safety and efficiency, or the capacity of the Local Road Network.”

If there is any doubt as to whether the site can be safely and acceptably accessed, this must be resolved before the site is allocated. A site allocation provides a degree of certainty for developers that the principle of development is accepted by the LPA. That cannot be the case if there is a subsequent responsibility for a developer to devise an acceptable means of access.

# Specific Site Allocation Reviews

## Knottingley & Ferrybridge

We do not accept that exceptional circumstances for Green Belt change have been demonstrated for these sites. If exceptional circumstances are demonstrated then, in our view, there is potential for the site at Knottingley to deliver a sustainable outcome.

The Knottingley and Ferrybridge Masterplan is insufficiently detailed to fulfil good practice by comparison with RTPI Practice Advice<sup>2</sup>.

The result of this is that it is not possible to assess whether green infrastructure requirements, Green Belt compensatory arrangements and biodiversity net gain will be sufficient to enable the site to be developed sustainably.

The site at Knottingley is adjacent to a High Value Landscape in Selby District, and is visually prominent in the landscape in its own right, so it is important that the Masterplan Framework for this site also includes a landscape strategy.

## Broad Cut Farm

We do not accept that exceptional circumstances for Green Belt change have been demonstrated. In particular for this site, we consider it an inappropriate extension to the urban area of Wakefield.

It is too remote from central Wakefield meaning the overwhelming majority of journeys to and from the site will be by private car.

Green Belt change should not enable unsustainable patterns of development.

If exceptional circumstances are demonstrated then we would raise the following objections and concerns in relation to this site.

2. [RTPI Delivering Large Scale Housing \(2019\)](#)

No planning applications should be determined on the Knottingley, Ferrybridge, Broad Cut Farm, Featherstone or South Kirby sites until a Masterplan Framework (with full stakeholder engagement) has been agreed for each to a standard established by the Aire Regeneration Corridor Masterplan and the Wakefield East Masterplan Framework. All development should be required to be in accordance with that agreed Framework.

Public Open Space requirements should not be limited to residential areas, as public realm within employment areas is also crucial.

The Masterplan Framework should indicate how the development of the site will result in:

- net reduction in flood risk in the catchment;
- net reduction in greenhouse gas emissions and air pollution;
- net gain for biodiversity;
- reduced private car mileage in the District and net modal shift from private car to other modes;
- net gain in access to green and open space

The site assessment mentions a masterplan, but this is not in the evidence base so we presume it does not exist yet.

Key issues such as Green Belt compensatory arrangements are deferred to planning applications and S106, which we do not consider acceptable.

The site effectively sits in two different landscape settings: one, the urban environment of Durkar; and two, the tranquil semi-rural environment of the canal corridor. The masterplan should include a landscape strategy specifically to avoid harm to the character of the canal landscape. The existing woodland/hedgerow should form the Green Belt boundary.

## Featherstone

We do not accept that exceptional circumstances for Green Belt change have been demonstrated. If exceptional circumstances are demonstrated then we would raise the following objections and concerns in relation to this site.

We strongly object to the proposed Ackworth-Featherstone-Pontefract Link Road. To the extent that this might constrain the accessibility of the site, the extent and capacity of the site should be reduced to that which meets locally identified development needs.

The site assessment mentions a masterplan, but this is not in the evidence base so we presume it does not exist yet. Key issues such as Green Belt compensatory arrangements are deferred to planning applications and S106, which we do not consider acceptable.

The site is visually prominent in the landscape and has extensive views in and out, so it is important that the Masterplan Framework also includes a landscape strategy.

## Calder Park

The site assessment references an existing Calder Park masterplan, but is not in the evidence base, and we have been unable to find it online.

All development should be required to be in accordance with the Masterplan.



## South Kirby

We have raised the following objections and concerns in relation to this site.

Development of the site is contingent on a major upgrade of Broad Lane. This road is currently popular with, but also hostile to, dog walkers, runners and cyclists, which indicates a significant local shortage of safer, more pleasant alternatives. Any development in this area must provide significant enhancement of space and routes for exercise and recreation.

The road upgrade will also impact on the Wildlife Habitat Network, and indication of how this will be managed for net gain is needed.

The site is visually prominent in the landscape and has extensive views in and out, so it is important that the Masterplan Framework also includes a landscape strategy.

## Castleford

We support this proposal allocation and the Aire Regeneration Corridor Masterplan.

The allocation should specify that all development be in accordance with the Masterplan.



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