

Introduction

CPRE welcomes the opportunity to comment. Our response is in three sections: the first deals concisely with specific concerns about the draft policies and text; the second outlines our agenda for how the 'rural core' of the district should be given much greater emphasis; and the third section analyses how the Council's proposal to adopt Garden City Principles might better inform the spatial priorities of the Plan.

At this stage in the Local Plan process we have not commented on specific site proposals. This is partly because we have not had an opportunity to comprehensively examine all the sites we might wish to comment on. It is also because we wish to focus our response on CPRE's strategic concern, which is to ascertain how the Plan will shape the future relationship between town and countryside in Wakefield district.

Section 1: Comments on draft policies and text

Context Map - This presents the countryside as white space and gives visual prominence to the road network. In our view the district's countryside is highly distinctive but under-appreciated, and should be treated as a 'rural core' that is central to the district's character and vision. With this in mind it should be given much greater recognition in the context map.

5.1 Development Principles - Applying the Garden City Principles to Wakefield is an interesting and innovative approach, which we analyse in detail in Section 3 of this paper.

Key Diagram - doesn't really show anything and again relegates the rural areas to background.

WSP5 - The policy sets an upper level of housing growth at 1,400 pa, compared to the MCHLG 2018 figure of 1,024 pa. It is not clear, but it is assumed that the actual housing target will be within the range between those two figures. The exact target within that range is not critical to our view of the draft Plan; rather, our concern is that the resulting development makes sustainable places and does not create car-dependent, suburban sprawl that needlessly encroaches into the countryside. On this basis, we have two particular concerns about WSP5:

In Part 1(b), Hemsworth, Horbury and Ossett are much less accessible by rail than the other settlements, and the importance of rail access should be given greater emphasis for sustainable development, with result that Hemsworth would be considered less suitable for growth;

In Part 3, whilst we warmly welcome the inclusion of a minimum density policy, there is ample evidence that net densities of at least 45dpha are needed to support sustainable

development, and new development should be configured to increase the average density of host neighbourhoods. Good design is the key to ensuring higher densities do not lead to a cramped built form. Therefore we consider that 45dpha should be the minimum density in less central areas, rising to at least 60dpha in town centres. We would also expect this to reduce the need for greenfield land allocations to meet housing supply.

WSP10 / Fig 5 Retail Hierarchy - It would be useful to map those neighbourhoods (urban and rural) where there is a deficit of essential retail facilities within walking distance.

WSP 11 Leisure, Recreation and Open Space - A number of key assets, especially in the countryside, operate as stand-alone facilities with a car-dependent access model. In some cases, notably Yorkshire Sculpture Park, car access is a principal revenue generator. Whilst it is inevitable that many/most visitors will continue to visit by car for some years to come, it is essential that a future strategy is put in place for sustainable access, active travel and climate response, so the network of facilities should be connected by an access strategy (6.48/WSP12). This links to WLP23 Strategic Leisure Corridors.

WSP13 - Major transport infrastructure, especially roads and quite likely HS2, tend to present major barriers to active travel by creating hostile environments for pedestrians and cyclists. All new transport programmes should be specifically required to reverse this trend by incorporating safe, attractive routes for pedestrians and cyclists and harnessing opportunities to enhance the connectivity of the active travel network. This will also have benefits on influencing the demand for travel WSP14.

WSP23 Climate Change and Resource Use - the policy is welcome but there are no targets and no sense of how the spatial objectives and outcomes of the Plan will help. Without targets, those policies that do have targets (ie housing supply) will tend to take priority. All new housing should be zero-carbon - links to WLP31 which only requires Building Regs as the performance standard for residential development. The Plan's commitment to respond to climate change gives justification to go beyond Building Regs.

WLP15-20 and WLP22 - Design/public realm policies for Wakefield City Centre and for Pontefract are very welcome. It would be useful to include comparable policies for other places and the 'rural core', because otherwise there is a risk that design is not considered important in other settlements.

WLP27 Green and Blue Infrastructure - The policy seems rather brief and generic considering the importance that is implied in supporting text. The status of the Wildlife Habitat Network as a policy tool is also unclear. How is it given adequate weight in decision-making?

WLP49/50/51/52 - There should be a much clearer 'net gain' approach across this suite of policies, in line with current national policy.

WLP51 - We fully support the Habitat Network, though para 7.142 implies it has not been updated since RSS, and this is likely to weaken the delivery of the policy.

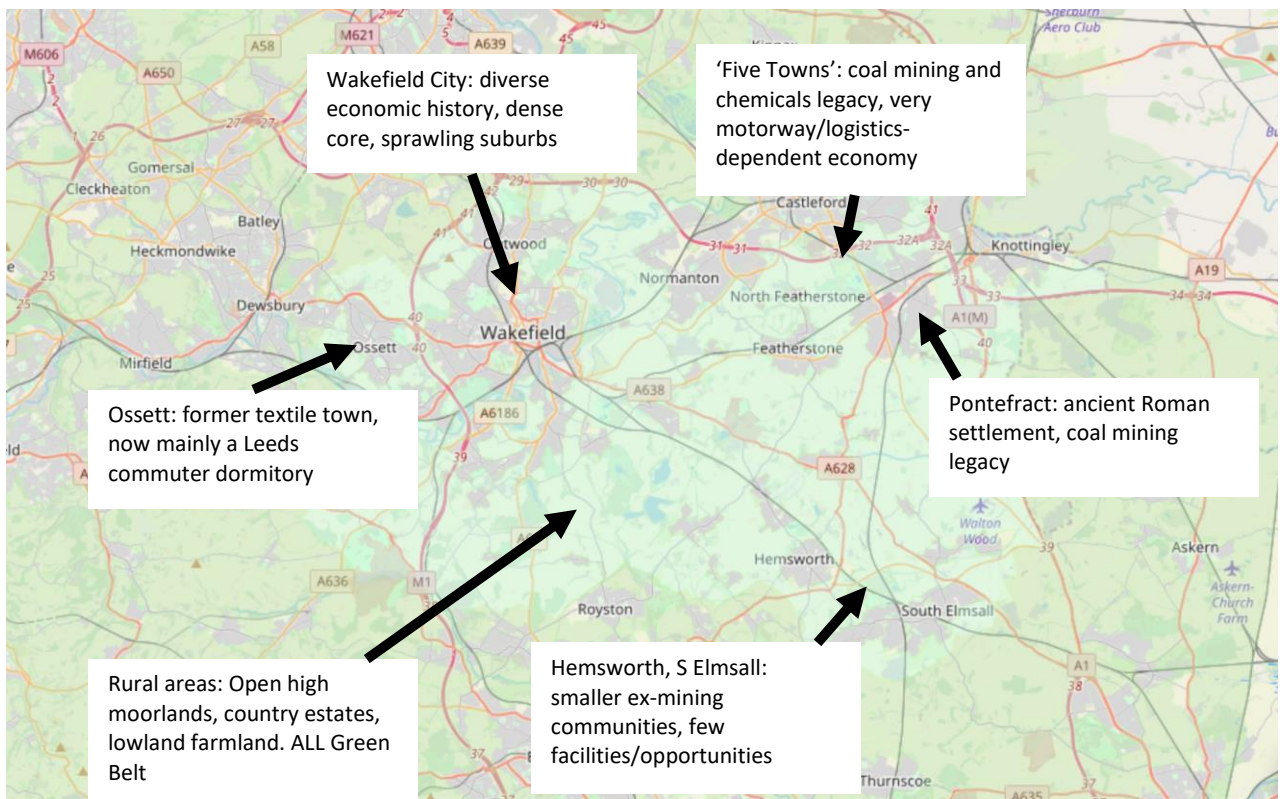
WLP53 to 57 - We support the policies but would be keen to submit further evidence on the scope for a stronger landscape enhancement approach to the Plan.

WLP64 - Whilst it is essential to control pollution and minimise harm, in our view this policy or a companion policy should be much more pro-active in setting out an agenda that includes clean air zones, dark skies and access to tranquillity. We would be keen to work with the Council on this.

Section 2: A District with a Rural Core

Information from the context section of the Draft Plan highlights the diversity of the district. It also clearly indicates an unusual geography for a metropolitan district - that it has a large, rural core, with a series of distinct urban areas around the edge. These urban areas are physically close together but do not appear well-related to each other in their functions or character. This points to a need for place-shaping policies that reflect, and seek to enhance, the characteristics of these different places. In this section we suggest that approaching the district from the perspective of its rural core would be helpful in terms of place-making, by looking at several overlapping policy considerations.

Figure 1: Information from the Draft Plan Context



Sustainable Movement

The Sustrans map of the district shows that a combination of the rail network and non-main road cycle routes offers a potentially useful system for sustainable and active travel, especially in the Calder river corridor and also in the rural core. A clear analysis is needed of how this network, and the opportunity for modal shift, will be enhanced by the Plan.

For example, if new road infrastructure is to be built between Pontefract and Ackworth, as proposed in the draft plan, then this will tend to induce significant additional road traffic. This risk could be at least partially mitigated by taking the opportunity to enhance the cycle links between Pontefract and Hemsworth, which are only 7 miles apart and therefore within comfortable cycling range if the route were safe and pleasant.

Figure 2: Sustainable Travel in West Yorkshire (source sustrans.org.uk)



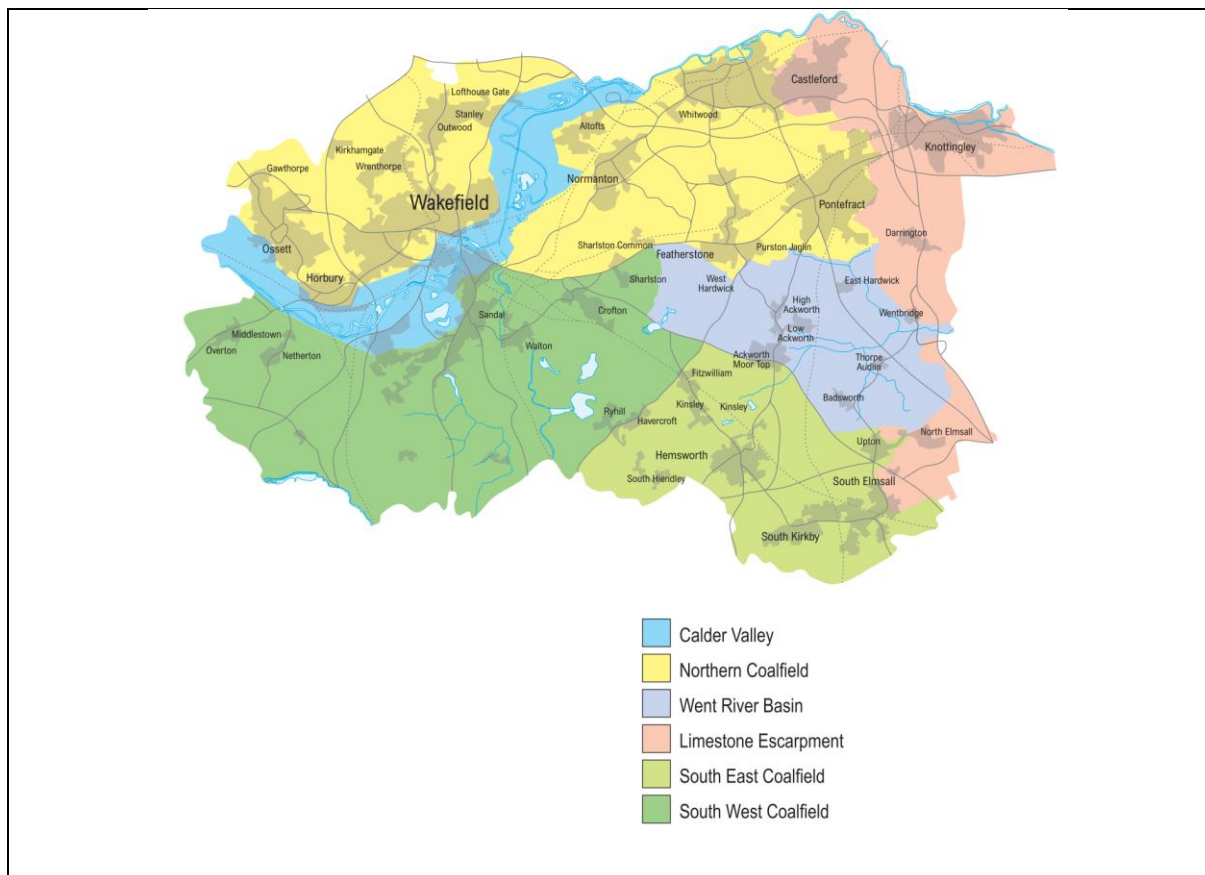
Landscape Character and Opportunity

Wakefield’s Landscape Character Assessment describes six landscape types. The South West and South East Coalfields and the Went River Basin areas largely correspond to what we term the ‘rural core’ of the district. Here, the landscape is generally high quality and has many points of interest, such as Yorkshire Sculpture Park, Newmillerdam, Sandal Castle, Woolley Edge, Winterset Reservoir and Nostell Priory. Currently these appear as separate, car-dependent cultural features, and it would be useful to consider how these landscapes might be promoted for sustainable and active access.

The Calder Valley is very significant for water ecology and for canal recreation, but its importance for the character of the district, its wetland landscape, and as a sustainable travel corridor, need to be substantially enhanced.

The Limestone Escarpment retains some high quality landscape but has been heavily impacted by transport and energy infrastructure and quarrying. Here, and in the predominantly urban Northern Coalfield areas, there is a need to enhance the landscape through better integration with development.

Figure 3: Landscape Character

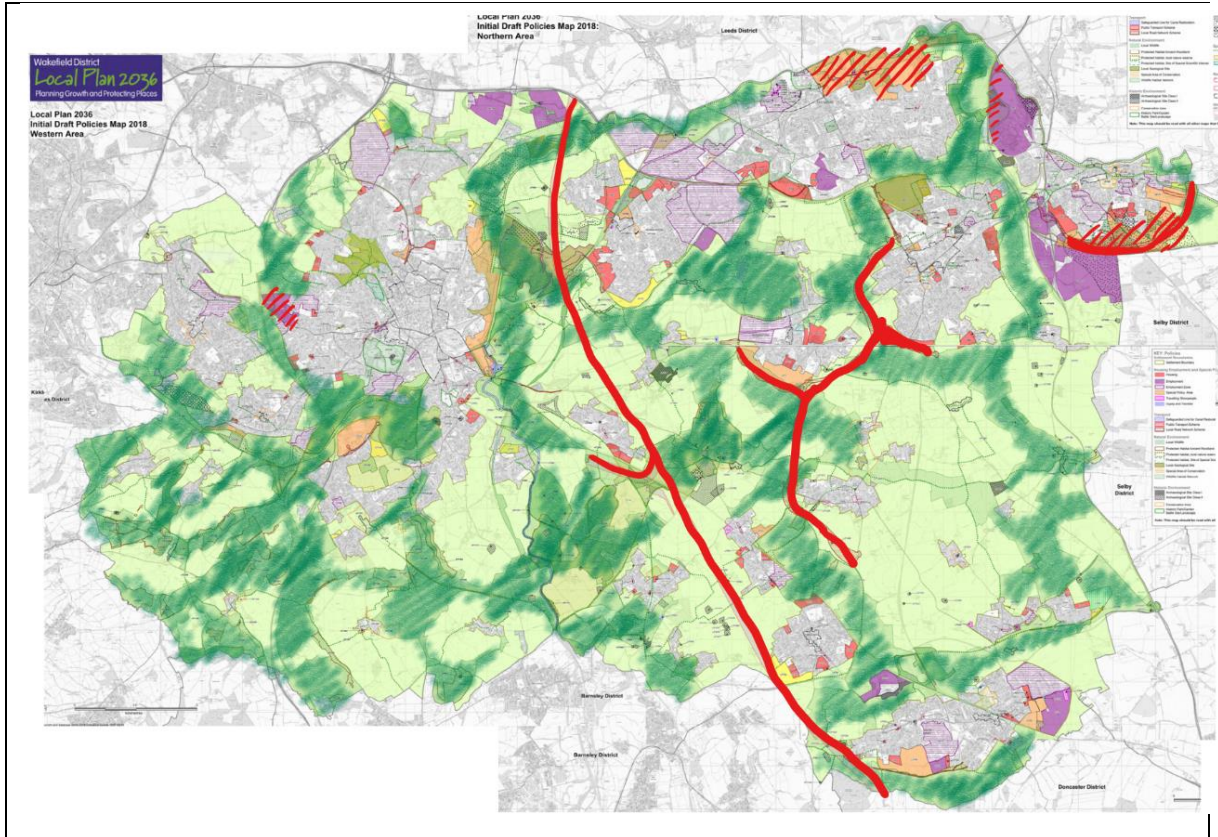


Green Infrastructure

In Figure 4 we have emphasised the wildlife network and green infrastructure features of the Policies Map (shaded in green) and indicated in red what appear to be the principal potential threats to the integrity of that network. Our initial desktop analysis suggests that:

- The wildlife/GI network is deeply interwoven with the urban areas and is not particularly correlated with the ‘rural core’ of the district. Consequently the rural core may be regarded as a set of cultural characteristics, rather than ecological ones.
- HS2 is may be the most significant challenge to the integrity of both the Green Belt and the GI network, compromising the remaining openness between Wakefield and Normanton, harming relative tranquillity of the landscapes around Sharlston, Walton and Ryhill, and directly affecting the GI assets around Winterset and Hiendley Reservoirs. It is possible that HS2 might also offer GI benefits as envisaged in the Leeds City Region GI Strategy, but it remains to be seen how well these benefits can be integrated.
- The proposed new road infrastructure between Pontefract, Featherstone and Ackworth present major risks to the remaining countryside in those areas, partly from additional road traffic but also, perhaps more significantly, from the pressure for future additional development along the new road corridors. This will have a profound impact on the landscape around High Ackworth, as well as likely loss of historical landscape along the Roman Ridge between Featherstone and Pontefract.
- There are additional potential risks to the GI network from proposed site allocations at Castleford/Fairburn Ings, South of Knottingley and M1 J40. The outcomes in these areas will depend crucially on how environmental considerations are integrated with development.

Figure 4: Pressures on Green Infrastructure



Section 3: Wakefield Garden City?

Applying the Garden City Principles to an established settlement pattern in Wakefield is an interesting and innovative approach. The risks associated with the Garden City principles is that they are not place-specific, and are based on assumptions about how making new places might be done. It would therefore be very useful to analyse how these principles might apply differently to different places.

Development Principles

5.1 The Wakefield District Local Plan will embody the Garden City development principles to deliver sustainable, high-quality places. Development will embrace the natural environment, offer high-quality affordable housing and locally accessible work in engaging, healthy and sociable communities:

- Land value capture for the benefit of the community;
- Strong vision, leadership and community engagement;
- Long-term stewardship of assets;
- Affordable mixed-tenure homes and housing types;
- A wide range of jobs within easy commuting distance of homes;
- Well designed homes with gardens, combining the best of town and country to create healthy communities;
- Development that enhance the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains, using Building for Life 12, zero-carbon and energy-positive technology to ensure climate resilience;
- Strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods;
- Integrated and accessible transport systems, with walking, cycling and public transport designed to create healthy streets and be the most attractive forms of local transport;

The principles of Active Design and Healthy Streets will be incorporated to deliver sustainable, well designed, high-quality places.

The TCPA has evaluated the history of Garden Cities and New Towns to derive key lessons for creating 21st century Garden Cities or other high-quality developments. These make clear that it is not enough to have declared principles - there must be the mechanisms to implement them. In particular:

- *The creation of new Garden Cities requires a dedicated delivery team (a Garden City Development Corporation) with the power and resources to do everything necessary to deliver the town, and guided by a legal commitment to implement the Garden City principles (i.e. to high-quality place-making), including meaningful engagement with residents and a commitment to long-term stewardship.*
- *Requirements for the long-term stewardship of new Garden Cities should be embedded in updated New Towns legislation. For existing projects, local authorities should require consideration of long-term stewardship within all large-scale development proposals.*

- *Local authorities and delivery bodies must make a commitment to secure high-quality development.*
- *Meaningful public engagement in the planning and development process should be a requirement of any large-scale development as part of evolving arrangements for long-term stewardship.*
- *New Garden Cities should be places in which people are proud to live and which provide a vibrant social and cultural life from the outset.*
- *The existing New Towns have a legacy of generous community assets such as green space, but for the most part stewardship and funding mechanisms were not put in place to look after them.*

(TCPA 2015: New Towns and Garden Cities - Lessons for Tomorrow. Stage 2: Lessons for Delivering a New Generation of Garden Cities)

There is no indication in the Draft Plan of how these lessons would be put into practice, though clearly it is possible to build some of them into the Local Plan process and policies. Place-making, engagement and stewardship appear to be the key ingredients.

URBED's Wolfson Prize winning essay (2014) explores the possibility of grafting Garden City thinking onto an existing settlement pattern. This hypothetical approach, for the fictional city of Uxcester, has subsequently been tested in real situations, most significantly by Sheffield. URBED say:

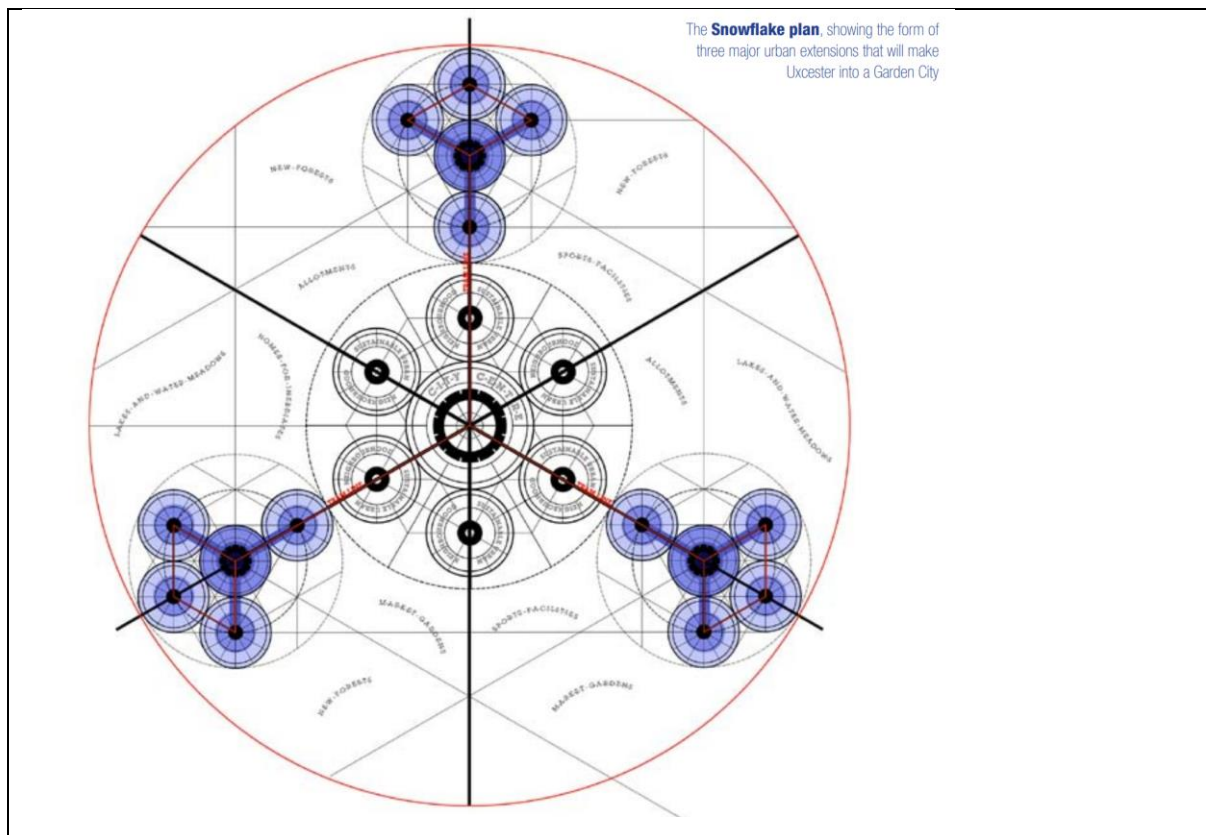
"We describe in this essay a plan to create a Garden City of almost 400,000 people by doubling the size of an existing city. We are proposing a 'new town', but it is one modelled on Edinburgh rather than Cumbernauld. As with our original essay we have explored this idea through the fictional city of Uxcester, a place that we have constructed as an amalgam of a number of cities, all places with populations nearing 200,000, with long histories, established institutions and settled communities.

"Key to these reforms is to redirect the huge sums that are invested in the purchase of housing land in the UK into the provision of infrastructure and the development of quality homes. However, large as these sums may be, they are not enough to build an entire Garden City. Even the unlocked value of the land is insufficient to build the infrastructure required for a Garden City if, that is, we are serious about the word 'city'. In a modern world where the economy is based on knowledge and technology rather than the manufacturing that supported the new towns, then the idea of a city is something that we should be very interested in. Places without major institutions of learning, that are unable to attract and retain the brightest and best young people, are destined to become dormitory suburbs, however good their garden might be. We have therefore concluded that it is better to graft a Garden City onto the strong root-stock of an existing city.

"We illustrate how the city of Uxcester could double its size by adding three substantial urban extensions each housing around 50,000 people. These lie within a zone 10km from

the city centre, which is a 20 minute tram ride, but is also of course solidly within the green belt. Our argument is that rather than nibbling into the fields that surround the city and all its satellite villages, we should take a good confident bite out of the green belt to create sustainable urban extensions that can support a tram service and a range of facilities. This will mean building on farmland, but much of the land around Uxcester is not accessible to the public and is of little ecological value. The Garden City vision is that for every hectare of land developed another will be given back to the city as accessible public space, forests, lakes and country parks - the garden in which the city will sit. In this way the whole of Uxcester will become the Garden City. The Garden City extensions are based upon some simple geometry; tram stops that are within 20 minutes of the city centre, neighbourhoods that are within 10 minutes' walk of these tram stops, each of which supports a secondary school and its feeder primary schools, and urban extensions made up of five neighbourhoods that have sufficient scale to support a district centre and employment uses. The overall plan is described in our Snowflake diagram which we have developed into a set of proposals to show how it would be applied to Uxcester.

Figure 5: URBED's Snowflake Plan for a Garden City (source urbed.coop)

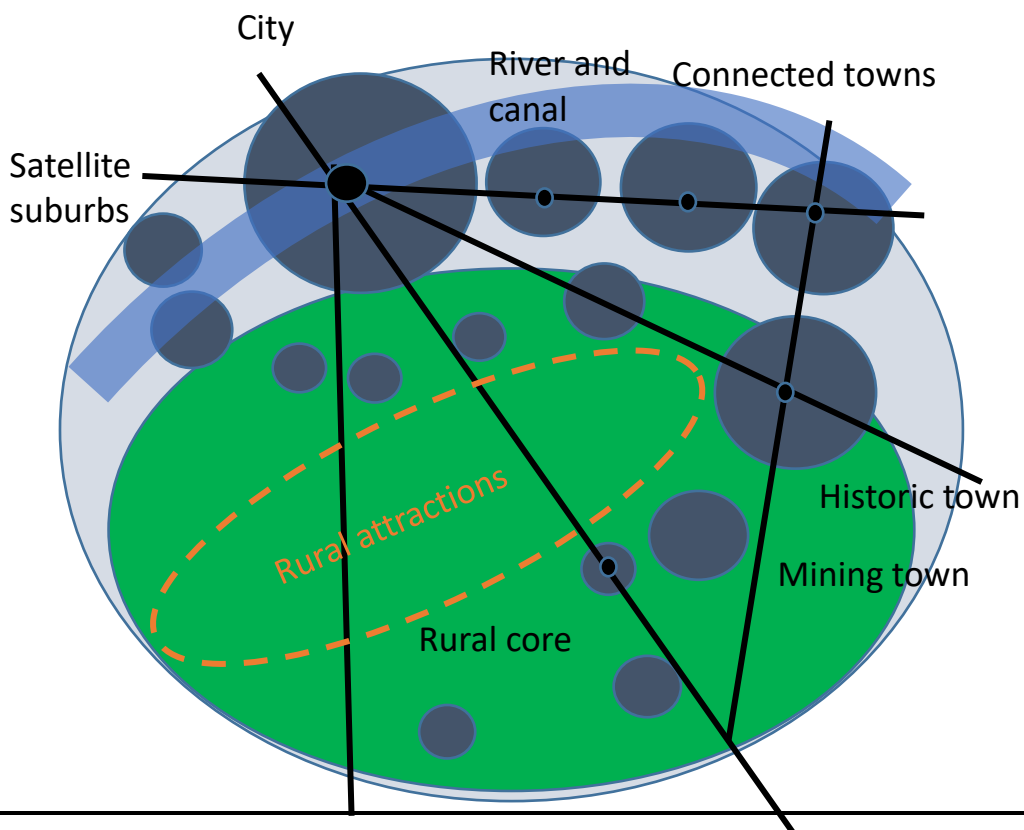


It is worth examining how URBED’s snowflake plan, and the assumptions about Uxcester, might be relevant to Wakefield. The population of Wakefield district is about 330,000, so when considered as a collection of places it is of the right order of magnitude. The local rail network is also relatively strong and well-used. There are perhaps three crucial factors about Wakefield that appear to go against the snowflake model and against URBED’s assumptions:

- Wakefield City is not at the centre of any model, since it could be viewed as a satellite of Leeds, but if considered within its own hinterland then the rural area is at the centre and the main urban areas are strung around the end;
- Unlike Uxcester, Wakefield’s rural land is generally of high ecological and landscape value;
- Whilst the second tier settlements are basically well-connected to Wakefield by public transport, there is a significant rural population in the Hemsworth and Ackworth areas that are too far from Fitzwilliam railway station.

Therefore, if Garden City Principles are to be successfully applied to Wakefield, then a variation on the spatial model may be needed. It is worth noting that URBED suggested Huddersfield as one of 40 UK cities that might lend themselves to their growth model, and a glance at the map shows that the linear arrangement of major settlements along the Calder Valley might also be a useful model, though this would require a greater level of inter-authority collaboration than is currently in evidence.

Figure 6: Developing a Garden City model for Wakefield



Our schematic (Figure 6) of Wakefield district focuses on rail connectivity and emphasises the rural core. This shows that:

- Rail-connected settlements are all within a 30 minute radius of the City;
- Some settlements, including some that are currently growing substantially, are much less well-connected to the rail network and therefore don't comfortably fit a Garden City model;
- A significant proportion of the district's urban population is quite disconnected from the rural core, but they are potentially well connected to the blue infrastructure of the Calder Valley;
- Rural attractions are a significant part of the character of the district.

Key spatial issues for the district are therefore:

- **Focusing development growth on the rail-accessible locations (and improving rail connectivity where possible);**
- **Improving sustainable connections between centres of population and the district's rural core;**
- **Integrating growth with environmental enhancement and restoration in and around the main settlements.**

The crucial question, therefore, is whether the Local Plan can be successfully accompanied by the leadership, engagement and long-term stewardship that is needed to address these spatial issues.
