

## **3rd anniversary of Calderdale's 'climate emergency' declaration: Friends of the Earth assesses what progress has been made since 2019**

In the early months of 2019, the five West Yorkshire district councils and the WY Combined Authority passed resolutions declaring a 'climate emergency': in Bradford (15th Jan), Kirklees (16th Jan), **Calderdale - 30th January**, Leeds (27th March), Wakefield (23rd May), and WYCA (27th June). These declarations were aligned with decisions that the WY authorities should achieve Net Zero at an earlier target year than the 2050 date set by the national government: 2038, or 2030 for Leeds.

To mark the 3rd anniversary of the WY declarations, the Friends of the Earth local groups in each district are making an assessment of what progress has been made since, recognising the **ever increasing urgency** of responding to climate change, and that **only actions count**. This is part of our ongoing campaigning around WY Mayor Tracy Brabin's [Climate & Environmental Plan](#) published in October 2021. This in turn is a response to the WYCA carbon emissions reduction pathways (CERP) study of July 2020, which identified the huge scale of decarbonisation that **has** to be achieved.

CERP's 'Maximum Ambition' pathway for WY requires that carbon dioxide emissions of 11.1m tonnes in 2020 fall to 5.1Mt in 2030: a **reduction of 6 million tonnes (-57%) in just 10 years** - so more than 500,000 tonnes every year. Whilst some emissions sectors, both nationally and locally, have been reducing systematically under the Climate Change Act process, others have not. The worst offender by far is transport where WY emissions in 2019 (pre-Covid) were actually higher than a decade earlier; as a result transport's share of an otherwise shrinking WY carbon budget has risen since 2005 from 29% to 40%.

### ***Calderdale positives since 2019***

- A [Calderdale version](#) of the WY CERP study has been produced (2021) identifying how emissions reductions from **1.06m to 0.56m tonnes by 2030** (-49%) *might* be achieved.
- there is cross-party, public/private, and community involvement in the Calderdale Council climate change working party, which discusses and tries to develop the climate emergency response.
- the Council has appointed a Cabinet member whose principal responsibility is to develop the response to climate emergency. The current programme of actions is [here](#).
- Council leader Cllr Tim Swift has been appointed by Mayor Brabin as her WY climate 'lead'.
- There's recognition of the connection between climate change and local catastrophic flooding.
- The Council & Calderdale Community Foundation have launched a [£1m Climate Emergency fund](#).

### ***Calderdale negatives since 2019***

- There is as yet **no action plan** produced to put the findings of the Calderdale CERP study into sequenced implementation (although the process of preparing it is now beginning). But will it identify where the nearly 50,000 tonnes yearly CO2 reductions will come from?
- The draft **Local Plan is undermining the Climate Emergency strategy** as it embeds an unsustainable growth pattern all the way to 2032. The Council has no modelling to establish what its emissions tonnage consequences will be.
- The Local Plan is based around **increasing highway capacity across Calderdale**, funded by WY Combined Authority, which is likely to encourage more road emissions in the 2020s.
- Calderdale has **not yet challenged insufficient WY level action**, particularly on transport. The FOE audit of the Mayor's climate plan (appended) has demonstrated that failed transport decarbonisation would collapse the entire WY climate emergency response. It's that serious!

**On balance:** Despite its positive public position and active process, the Calderdale Council response since 2019 has so far still been **inadequate** because: it hasn't yet faced up to the quantitative scale of carbon reductions needed; its Local Plan doesn't support but contradicts its climate strategy; and like other WY councils it needs to demand greater ambition & urgency at the WYCA level.

**What FOE will do next:** We will not accept this situation at either the Calderdale or WY level. We will be campaigning with others for more urgent action throughout this '3rd anniversary' season.

*Further information from Anthony Rae, coordinator Calderdale FOE [ar@anthonyrae.com](mailto:ar@anthonyrae.com) January 2022*

## The West Yorkshire Mayor's Climate and Environment Plan: An Audit by WY climate and social justice organisations

This **audit of Mayor Brabin's Plan** - prepared by the WY Friends of the Earth local groups and many other affiliated climate and social justice organisations - identifies some key issues for the Combined Authority and each of the West Yorkshire councils to consider as they reflect on progress they have achieved since 2019's Climate Emergency declarations and what they now intend to do to deliver the commitments of the Mayor's Plan. Our questions and suggestions are **highlighted in grey**; the most challenging of these concern **transport** which are on page 5

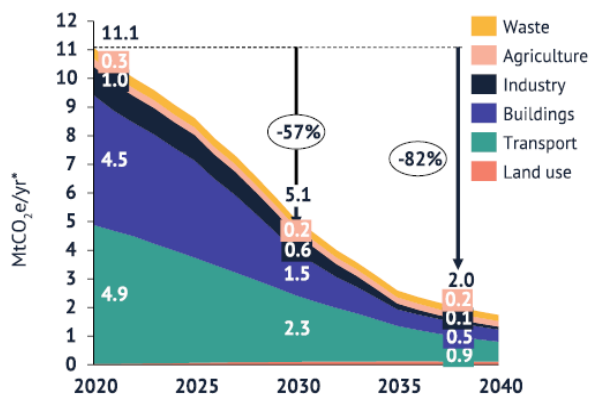
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Between January-June 2019 the five West Yorkshire councils - Bradford, Calderdale, Kirklees, Leeds and Wakefield - and the West Yorkshire Combined Authority (WYCA) declared a 'climate emergency' - indicating a determination to act with increased urgency to reduce the region's carbon emissions to Net Zero by 2038 (2030 for Leeds). In July 2020 the Combined Authority issued its 'Carbon Emissions Reduction Pathways' study (CERP), which quantified a possible reduction in WY emissions from 11.1m tonnes annually in 2020 to 5.1m tonnes in 2030, a reduction of 57% in just 10 years - and proposed how, in detail, that scale of carbon reductions *might* be achieved. In May 2021 Metro Mayor Tracy Brabin was elected, with one of her 10 pledges being to 'tackle the climate emergency and protect our environment'. Now (October 2021) the Mayor has published her **Climate and Environment Plan**, with some 40 detailed policies and actions to be delivered by 2024.

But, with the third anniversary of those climate emergency declarations about to be reached from the start of 2022, we all need to ask **what has actually been achieved as the climate clock has ticked down through those 3 years**, and **will the Mayor's Plan now accelerate actions across the 2020s in order to achieve its target of Net Zero?**

The principal sections of the Plan concern:

- **Pathways and Scenarios:** it repeats the 3 emission scenarios of the CERP - 'Maximum Ambition', 'High Hydrogen', and 'Balanced Pathway'; together with a baseline scenario - which are expressed in pathways displaying how each of 6 emissions segments must reduce downwards annually. Below is the 'Maximum Ambition' pathway and shows that, as with all the other scenarios, the 2 largest segments having to reduce are buildings (power & heating), and transport.



- **Roadmaps and Action Plans:** there are action plans for eight areas, each with a number of policies - transport (9 policies), sustainable homes (2), business & industry (4), energy generation (4), natural environment (5), leadership (5), 'cross-cutting' (7), and 'climate ready' (3). Six 'roadmaps' illustrate visually how the major measures proposed for the pathway segments will be sequenced through to 2038.

- **Roles of the Mayor/public authorities/business/WY people:** the Plan's final section sets out what the Mayor and WY councils **will** do, the government **must** do, and businesses and people **could** do in order to implement its actions.

This audit is intending to make a constructive contribution to the 'conversation' about the Climate and Environment Plan that Mayor Tracy Brabin has called for. It identifies just a small number of **important areas** where we suggest improvements should be considered.

## ***The need for greater certainty and urgency***

We welcome the publication of the Mayor's Plan, but note that this was 27 months after the Combined Authority's declaration of climate emergency in June 2019, and 15 months after the availability of the CERP study. We ask: **how will it be possible to tackle the climate crisis and achieve the enormous scale of annual emissions reductions required in the 2020s if WYCA and individual WY councils take this long just to prepare its first Action Plan?**

So certainty of emissions reduction must be increased, but the problem with the Plan at the moment is that it:

- has not yet selected a preferred emissions pathway which the Mayor and West Yorkshire public authorities have to work to and deliver.
- has not identified anywhere the quantified amounts of emissions reduction tonnages that any of its proposed 40 actions have to achieve to be judged a success.
- has not set detailed timescales within its 2021-24 life by which the proposed individual actions must be advanced, or an intention to establish those timescales as its 'next step'.

Without these three essential features it will not be possible for the Plan to be implemented across partnerships which may have multiple members, nor can there be effective accountability and scrutiny by the Combined Authority mechanisms, and civil society. We understand why, immediately, a 'preferred scenario' has not yet been selected, and that instead '*The Action Plan is focused on the 'no-regrets' activity that will be taken over the next three years*' which will contribute to **all** scenarios. In itself this is a reasonable approach, but it can't be pursued at the cost of providing no quantified targets and timescales for the Plan's actions. The CERP is replete with quantified reduction proposals for each emissions sector which can be utilised. Please note also that we are not overlooking the fact that none of the CERP scenarios actually result in 100% NZ decarbonisation by 2038 - the best achievement is the 82% reduction of the 'Maximum Ambition' scenario - which we could claim is a critical shortfall. That may be the case but in this audit we wish first of all to rectify issues for the immediate future.

Consequently we **suggest to the Mayor and the WYCA Climate, Energy and Environment committee** that

- a delivery programme is immediately prepared which sets out the process by which the choices between pathways (which, as we'll see below, have crucial consequences in relation to transport emissions), nominal tonnage targets for individual action areas, and year-by-year (2021-24), timelines and milestones will all be provided.
- In relation to the monitoring of emissions reduction progress - where we welcome the decision of the Combined Authority on 9th December<sup>1</sup> to prioritise this action so as '*to ensure we are on track to meet the targets that we have set and to accelerate action where progress is off-track*' - we suggest that it should consider dividing each of those 3 years into two halves, and establish and communicate overarching 'what's going to happen in the next 6 months' timelines so that decision-makers and the general public can maintain an adequate awareness of how the Plan is meant to be advancing. Everyone across WY must have a means of knowing what is meant to be happening 'in the next few months' to tackle our Climate Emergency.
- Effective public communications about the Plan - that it exists, what its proposed actions are, whether they are being implemented or not - are a prerequisite. (Consequently we welcome the prioritisation of this action by the CA: '*Deliver communications and engagement with a focus on how partners, businesses and residents of West Yorkshire can work together to benefit from tackling the climate emergency*'.) For 15 months our groups were waiting to participate in the public consultation around the CERP promised by the authority in July 2020; this did not take place and there was no public information as to why not. The Mayor has promised a 'Conversation' about the Plan, but the [registration opportunity](#) for this has not been properly publicised. At the moment information about the Plan are semi-hidden under the 'Economy' tab on its website; surely it requires a tab of its own? The communications approach about the Mayor's response to our climate emergency must be improved.

## ***The Plan's individual action areas***

<sup>1</sup> report COP26 and the West Yorkshire Climate & Environment Plan para.2.10.

We believe **the action plans for individual emissions sectors are generally well structured, and with the necessary broad coverage, so creating a good foundation for the first 3 years of a West Yorkshire-wide plan.** This applies to 'business and industry', 'energy generation, supply and flexibility', 'natural environment', and 'climate ready'. For example action *NE02 Land-use Data and Evidence* (in Natural Environment) commissions the '*undertaking of research with partners on the current peatland condition in the region and potential for restoration*' which can then contribute to '*providing opportunities to 'slow the flow' of water through natural flood management techniques to provide more protection downstream*' in action *CR03 Flood risk and damage* (under Climate Ready). We have however more detailed comments (below) on two particular action plans: Sustainable Homes, and Transport.

There are three sections of the plan dealing with various aspects of coordination - 'Leadership', 'Cross-cutting', and 'Roles' - the effectiveness of which will be crucial for developing action at pace and (in some cases) from a standing start. The latter notes that '*We cannot [achieve Net Zero by 2038] alone and we will need the power of our partnerships and the people of West Yorkshire to do this together*' but, as will be well known, it's the alignment between the policies and actions of the UK government and what we do here in West Yorkshire that will be **the** determining factor. There are no fewer than 16 requirements listed on page 49 that the government *must* undertake - including '*provide new powers and multi-year sustainable funding and incentives for achieving net zero and nature recovery at regional and local levels - without these freedoms and flexibilities local areas will find it increasingly difficult to deliver against their locally defined targets*'. Consequently it's disappointing that the Combined Authority on 9th December did not identify this area as one requiring prioritisation. Maybe it's assumed that such interactions with government will take place in any case, but experience over recent years has not demonstrated that this engagement has been carried out forcefully enough or with success. It's suggested that the Mayor and Combined Authority **must prioritise this 'advocacy to central government' action, and publicly communicate what has been done, and with what results.**

A parallel section of the 'Roles' area sets out the actions that the 5 West Yorkshire councils will undertake. These include '*produce and extend climate and environment roadmaps and action plans following climate and ecological emergency declarations*' and '*align Local Plan policies to further sustainable development, decarbonisation, net zero and nature recovery plans and outcomes*'. This is obviously important seeing that each council will have been developing its own approach to tackling climate emergency in the 3 years since 2019. But: are those district climate strategies effective; and do they integrate and reinforce each other, or not? It's critical that, at the start of implementing the Mayor's plan, that the extent of this alignment is quickly established. It's suggested that each **WY authority should be requested to undertake an audit of the alignment between its own climate strategy and the Mayor's Plan - also identifying specific areas where synergies might be developed - for submission to the Climate, Energy and Environment committee and to the Mayor. To be able to undertake this, the 'tonnage targets' and 'milestones' suggested on the previous page will be essential.** Scoping/demonstrating the alignment of the plan with the likes of the Y&H Climate Commission work and the Transport for the North decarbonisation strategy will also be important.

This will particularly apply to the interaction between 'climate emergency' and spatial planning. We are already very aware of the contribution, **either positive or negative**, that the local plans of the five West Yorkshire councils can make to tackling the climate emergency. Local plans, whether already adopted or being prepared or revised, can in so many ways reinforce the thrust of decarbonisation or alternatively comprehensively undermine it, not just now but over the crucial next decade.

In theory the national planning policy framework has set the right framework - 'The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions ...' *para.148* - but without the strongest possible coordination inside authorities then this doesn't necessarily happen. We appreciate that the Mayor has not been allocated a responsibility for spatial planning, which is a major setback - but nonetheless it is good to see that action *CC02 Strategic Planning* - '*We will develop the spatial evidence base to tackle the climate and environment emergency and use this to inform and influence Local Plan policy and a potential West Yorkshire Strategic Spatial Plan*' - has been included. We understand that a report is being prepared to review 'issues and options'.

We suggest that, once this report has been considered, the Mayor - and then each of the West Yorkshire authorities - should initiate the process by which civil society and other parties can submit their own contributions about how the interaction between climate emergency and spatial planning strategies and local plans can be made to reinforce each other.

**Sustainable Homes** - This section of the plan notes the sheer scale of the housing energy efficiency problem: *'just less than 700,000 existing homes across West Yorkshire will need some form of energy efficiency retrofit to be undertaken to bring them up to a level that contributes to significant emissions reductions'*, and then additionally, there's the task to ensure that *'the energy efficiency and low carbon heating and power of the thousands of new homes to be constructed in the region is built into their design at the construction stage'* so that these do not contribute to further emissions and require expensive retrofits in the future.

The two measures proposed in the Plan are the establishment of a home energy advice service, and a 'Better Homes Yorkshire Hub' which appears to be the location of all the many diverse routes to more energy efficient and warmer homes, including *'making the case, and submitting proposals, to government for sustainable long-term funding for West Yorkshire'*, *'requiring that the performance of new build homes meet energy, water efficiency, climate resilience and space standards'*, and *'procuring a framework of high-quality repair, refurbishment and retrofit suppliers'*, as well as *'supporting the building of 5,000 affordable and sustainable homes'*.

Since so much is riding on the performance of the Better Homes Hub we ask the following questions: When will the Hub be up and running?; who will be running it?; when will it publish its own detailed action plan for the 10 areas it's responsible for?; how does WYCA intend to engage with the proposals of the government's new Heat & Buildings strategy?; and which WYCA committee is responsible for supervising the delivery of the Hub?

But it's the Plan's section on **Transport** - around which our environmental groups have already been campaigning for years - which represents the biggest challenge, for a number of reasons. At the national level, total transport emissions (so including aviation) have risen both absolutely and relatively since 1990: from 152Mt to 165Mt in pre-Covid 2019 - so haven't even begun the process of decarbonisation - whilst increasing their share of the national carbon budget from 17% to 33%. In West Yorkshire, the government's local authority level statistics (which do not however include aviation) show that transport emissions of 4.5Mt in 2005 have dropped only marginally to 4.3Mt in 2019, and with actual increases since 2013. The transport share of all WY local emissions has consequently soared from 28% to 40%. These trends are replicated in all 5 West Yorkshire districts.

The failure of transport decarbonisation policy at the national level (which is the responsibility of the Department for Transport) therefore creates a daunting backdrop for the scale of WY emissions reductions required by 2030: from a 2020 baseline of 4.9Mt in the CERP scenarios (which properly include aviation) to 4.1Mt by 2030 in its Baseline scenario (-16%), 3.0Mt in its Balanced Pathway and High Hydrogen scenarios (-39%), and 2.3Mt under 'Maximum Ambition' (-53%). The latter would require annual emissions reduction averaging a quarter of 1m tonnes every year! If transport emissions only achieved Baseline pathway reductions to 2030, **they would by then take up 80% of the total West Yorkshire carbon budget.**

This review of the transport tonnage data therefore sets the context for an assessment of the Mayor's 9 proposed actions TR01-9<sup>2</sup>, and establishes two fundamental tests which they have to pass. The Actions have a common characteristic: they all propose 'positive' measures to improve the carbon efficiency of particular transport modes or services, and the take-up of more sustainable modes. But on their own, this cannot be an adequate response to a transport decarbonisation challenge of this scale. Instead we have to ask:

- Does the Plan propose actions which will prevent a continuation of the two 'negative' trends - increased road vehicle demand and capacity, and increased aviation demand and airport capacity - that have been driving transport emissions upwards?; and the answer is **No**
- Will the Plan's 9 positive actions produce sufficient emissions reductions to achieve any of the reductions scenarios, and the answer is **we don't know** because there is no evidence or data that demonstrates that in aggregate they will achieve the necessary decarbonisation tonnage.

<sup>2</sup> We have also considered the Mayor's response of 2nd December to an Action Network petition calling for WYCA not to proceed with road capacity expansion, and to oppose LBA expansion. Our reply to that letter is being submitted at the same time as this Audit, and contains more detailed information on these issues.

In consequence, and until an analysis of the transport decarbonisation strategy shows to the contrary, the **environmental groups are assuming that transport emissions will only achieve a Baseline pathway reduction to 2030**, with the consequential catastrophic impact on the WY carbon budget and on the Mayor's Plans to reduce it.

This is therefore also a governance crisis. The WYCA Transport Committee has to our knowledge not been presented with an overarching quantified analysis of the **scale** of its decarbonisation challenge, and so have not engaged with it. Instead they have proceeded by considering and improving individual 'positive' measures (of the same type as TR01-9) in isolation, as if under the illusion that this incremental approach would somehow produce the necessary amount of decarbonisation despite the fact that they had no basis for that assumption.

Moreover the Combined Authority on 9th December agreed that the transport decarbonisation 'first priorities for the next three years' should be actions TR01/05/06/09, a selection which does not seem likely to maximise emissions tonnage reductions such that the CERP pathways can be achieved. Specifically the action within TR02 - to '*scrutinise the case for the construction of new roads through the funding that we control and only move schemes forward where they demonstrate significant benefit in delivering our priorities*' - has **not** been prioritised. We've also noted that the newly established Transport Scrutiny Committee has not, as we urged, included in its work programme for the 2021-22 year consideration of 'the extent to which the 9 actions of the Mayor's plan will be sufficient in themselves to achieve the amount of decarbonisation identified by the WYCA carbon emissions reduction pathways study', or to 'test the integrity of WYCA 'carbon impact assessment' of its major roads programme'.

Collectively these initial decisions do not bode at all well for starting the successful decarbonisation of this the largest and most intractable emissions sector, thus justifying our judgement above that only Baseline reductions may be delivered.

Therefore **we call upon the Mayor and the WYCA Climate, Energy and Environment committee to:**

- take immediate action **to ensure that the Transport Committee considers within the next 3 months what its policies and programmes approach will have to be in order to achieve the emissions reductions of the various CERP scenarios**. This becomes even more important due to the decision of the CA in December to prioritise four action areas without first quantifying their carbon reduction potential. Successful transport decarbonisation is essential for all aspects of the plan, and WY civil society has to know that the Transport Committee and the Combined Authority itself have finally accepted 'ownership' of the scale of this huge problem.
- produce a **quantified and sequenced analysis of the Plan's 9 positive measures** that can demonstrate what emissions tonnage reductions will be produced by each of them, and year by year to 2030, so that their collective contribution can be tested against the CERP scenarios.
- When (as we understand) the Climate Committee finally comes in January to consider the results of the Carbon Impact Assessment process to be applied particularly to the major legacy programme road capacity improvements which the Mayor has inherited, it must i) **make available to interested parties all the Assessment's underlying data and modelling assumptions** so that they can be subject to independent scrutiny; and ii) not just **apply its carbon assessment** to individual infrastructure schemes, but **to the road capacity programme as a whole**, and the **ability of this major area of transport capital funding to be contributing to priority decarbonisation investment**.
- Since, as we have already pointed out to WYCA Climate committee, the Plan's proposed response to Leeds Bradford Airport expansion - 'produce a national decarbonisation strategy for aviation and introduce a frequent flyer levy' *page 50* - has already effectively been rejected by the government, which still has the ability to immediately approve the LBA planning application, **the Mayor and Combined Authority must now go further and publicly call on the government to reject the application**.

We hope you've found this audit of the Climate & Environment Plan constructive (if challenging!) We look forward to continuing a discussion about this during the first half of 2022.

20th December 2021  
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