Cheshire East Council’s
Environmental Strategy Consultation
All formal responses
Contents

Introduction .................................................................................................................. 3
Responses from organisations .................................................................................... 5
  Cheshire CCG ........................................................................................................... 5
  Cheshire East Climate Alliance ............................................................................... 6
  NFU North West ...................................................................................................... 7
  The Environment Agency ......................................................................................... 9
  The Tatton Group .................................................................................................... 19
Responses from Town and Parish Councils ............................................................... 33
  Holmes Chapel Parish Council .............................................................................. 33
  Pickmere Parish Council ....................................................................................... 35
  Poynton Town Council .......................................................................................... 36
  Sandbach Town Council ......................................................................................... 47
  Weston & Basford Parish Council ........................................................................ 48
Responses from individuals ......................................................................................... 51
  Alec & Val Scaresbrook (members of the public) .................................................. 51
  Councillor Akers-Smith (Cycling & Walking Champion for CEC) ....................... 63
  Colin Dore (member of the public) ......................................................................... 68
  Michał Piątek (member of the public) .................................................................. 68
  Nick Billington (member of the public) .................................................................. 74
  Reverend John Whitehead (ADAPT member and Cheshire CPRE trustee) .......... 81
  Rita Ledgar (member of the public) ....................................................................... 83
  Sarah Allwood (CEC Environmental Health Team) ............................................. 84
Anonymous responses ................................................................................................. 85
  Anonymous response 1 ......................................................................................... 85
  Anonymous response 2 ......................................................................................... 85
  Anonymous response 3 ......................................................................................... 86
  Anonymous response 4 ......................................................................................... 86
Introduction

Purpose of the consultation


The strategy set out the council’s proposed strategic goals and priority actions, in response to climate change, and to protect and enhance the local environment.

The aim of the consultation was to see what residents thought of this draft strategy, to see how they felt it might be improved, and to see how they thought the council could support the wider community to reduce its carbon footprint.

Engagement strategy

The consultation was widely promoted, including via:

- The Council Leader, Sam Corcoran – a keen advocate of the strategy
- Councillors and Town and Parish Councils
- Media releases to the public
- The council’s Digital Influence Panel
- Social media.

Consultation responses

Overall there has been a significant response to the consultation, including:

- 384 survey responses
- 32 formal written responses
- 54 social media comments.
Responses were received from a wide range of stakeholders, including:

CEC Environmental Health Team | Natural England
Cheshire CCG | NFU North West
Cheshire East Climate Alliance | Pickmere Parish Council
Cheshire East Countryside Access Forum | Poynton Town Council
Cheshire Local Nature Partnership | Sandbach Town Council
Congleton Cycling Campaign | Scotwood Nursery
Congleton Sustainability Group | Shavington-cum-Gresty Parish Council
Councillor Akers-Smith | The Environment Agency
Goostrey Parish Council | The Tatton Group
Holmes Chapel Parish Council | Transition Wilmslow
Holmes Chapel Village Volunteers | Walkers Strings Limited
National Trust | Weston & Basford Parish Council

Report format

This report is released as part of a collection of 3. The 3 reports being released as part of this consultation are:

1. A summary report
2. A full report
3. This collection of all formal responses
Responses from organisations

Cheshire CCG

Please find below brief information from the Cheshire CCGs in response to the Council’s Draft Environmental Strategy 2019-2024 Consultation.

Tackling the climate emergency

We are pleased to see that Cheshire East Council has embraced this challenge and is currently consulting on its Environmental Strategy 2019 – 2024 and the strategic goals and priority actions the Council will take to respond to the global challenge of climate change, and to protect and enhance the local environment.

Cheshire system partners can make a big difference locally to sustainability and climate change through a shared ambition to become carbon neutral, and targeting a date to reduce emissions of greenhouse gases to net zero. If we get this right we will not only secure a better future for those that follow us, we will also support economic growth, support healthier lifestyles, help tackle fuel poverty and ensure the responsible use of NHS resources that will help to minimise costs and maximise the funds available for patient care.

The development of the Cheshire CCG provides an opportunity for us to take a system lead role in driving sustainability across the local NHS. As partners in the Cheshire and Warrington Leaders Board, the Cheshire CCGs have signed up to the 10 Cheshire and Warrington Climate Change Pledges made in May 2019.

Both draft 5 year Place Plans, which were consulted on in Autumn 2019, included in their technical guidance the CCGs’ commitment as outlined in the NHS Long Term Plan to support the ambition to improve air quality by cutting business miles and fleet air pollutant emissions, and fully phase out primary heating from coal and oil fuel in NHS sites.

At its meeting of 23rd January 2020 the new Governing Body of the Cheshire CCGs will receive a recommendation to work with all local NHS organisations to declare a
climate emergency and will consider a range of opportunities to pursue as part of our approach to sustainability and climate change. We look forward to working very closely with the Council on this agenda.

**Cheshire East Climate Alliance**

1) We are very pleased that Cheshire East has started the process of taking steps on the climate emergency. As separate groups, our members have responded to the component parts. There is a climate emergency and we need emergency measures to make change possible. However, the CEC draft measures seem weak in parts and unconnected.

2) On the overarching strategy, there are questions that need to be addressed before it can have real meaning. For example, there is nothing about measurement of our present carbon footprint under any heading, and setting reduction targets against those measurements. Is CEC using the carbon modelling tool “Scatter” already used by Manchester City Council and Cheshire West? Can the work on carbon reduction be done on schools too?

3) We are very aware that other councils are taking bigger strides and would like to see these utilised here – e.g. Cheshire West operates a Design Review Panel staffed voluntarily by experts drawn from the community. We would like to see an environment-focused Review Panel, and would be extremely willing to propose appropriately skilled and experienced people to take part.

No new planning applications should be agreed without clear and comprehensive actions relating to climate change and wider environmental concerns; these may include energy use and minimisation, sustainable transport, biodiversity, and air quality and noise control measures. Friends of The Earth have highlighted many steps councils can/are taking now that really should be a reference point for Cheshire East so that we are not behind the leaders.


4) The local site allocations and development policy has just been reviewed, but
does not seem to take enough account of the necessary amendments resulting from an effective Environmental Strategy.

5) We are pleased to see suggestions about 20 mph speed limits in residential areas (best done by signage not humps) but do not see a long term transport strategy in the documents that will get us out of cars, into integrated bus and train networks. Cornwall has implemented some of the Bus Services Act 2017 ideas – and we need to follow suit. We are pleased to see work on cycling, and know that we need bold strokes to get children cycling to school.

6) We want to see a clear climate emergency staff lead – we know CEC are short of money and therefore staff, but this needs to be reinforced. We do have skills in the Cheshire East Climate Alliance in planning, building, and experience in community involvement that we could offer free help on.

7) Finally, we want to encourage Cheshire East to communicate why it is doing things and what it is doing – whether by having volunteers like the Waste Reduction Volunteers, using web sites, public awareness days (like Congleton’s Green Fayre), its newsletter, and Facebook.

**NFU North West**

I am writing on behalf of the NFU in response to the above consultation

The NFU represents 55,000 members in England and Wales involved in 46,000 farming businesses. We have around 1,150 members in Cheshire.

Our trade association is the largest farming organisation in the UK, providing a strong and respected voice for the industry and employing hundreds of staff to support the needs of NFU members locally, nationally and internationally. We work with government departments across government, including agriculture, rural affairs, environment, energy and climate change issues. With 71 per cent of UK land area in the agricultural sector, NFU members represent the bedrock of the rural economy, with a diverse range of business interests in addition to food production. Our vision is for farming to grow and create wealth through a wide variety of goods and services for the UK economy, centred upon but not limited to food production.
The NFU welcomes of the opportunity to comment on Cheshire East Council's Draft Environmental Strategy and would make the following points:-

**A Carbon Neutral Council by 2025**

We note the ambition for Cheshire East to be carbon neutral by 2025. The NFU itself set an ambition for the agricultural industry to be carbon zero by 2040. Farmers and land managers will be critical in meeting the tackling climate change and the county farms estate as well as otter farmers in the county are uniquely placed to assist the council in meeting its objectives. However, this needs to be balanced with the need to produce high quality food.

The council also looks to ‘Embed carbon reduction into Council procurement, purchasing and facilities management.’ Decisions should be made using accurate information which reflects the UK situation rather than using global figures to make decisions. Agriculture accounts for 10% of GHG emissions in the UK and the emissions from UK production systems are typically much lower than the global figures. For instance, the carbon footprint of beef produced in Western Europe is 1.5 times lower than the global average. British beef has a carbon footprint 2.5 times lower than the global average. Cheshire is ideally suited to producing grass for dairy and livestock farming systems and in many circumstances it is not possible to simply switch to an alternative system. Both the land quality and regulation prevent this and it can cause environmental damage. Grazing livestock help create and maintain many of our most iconic landscapes.

The productive grassland in Cheshire is a huge carbon store and the way in which the land is managed modest field sizes, each surrounded by Hedge rows and trees provide a great deal in the way of natural capital to the county.

Decisions on net zero and on procurement should be balanced with the need to produce food and should be made using local/UK figures and not global figures.

**Sensitive and Sustainable New Development**

This section highlights that fact that new developments should be climate resilient. One area which our members are very concerned about is the issue of flooding and
drainage. As the climate changes we will see more extreme weather events characterised by more rain falling in a short period of time. This has resulted in our members land flooding as the current land drainage system is unable to cope.

Increased development leads to a faster run off rate which would further exacerbate the problem. Again, farmers are in a position to assist with some of the solutions, such as water storage and Natural Flood Management. However, new developments should take into account the impact of the water after it leaves the new development. A system needs to be introduced whereby householders and property owners contribute towards the costs of maintaining the drainage system into which their water flows.

**The Environment Agency**

The Environment Agency welcomes the opportunity to respond to the public consultation on the Draft Environmental Strategy for Cheshire East. We have reviewed the plan to consider where our interests can support the development of the strategy and this is reflected in our response.

DEFRA’s 25 Year Environment Plan (published Jan 2018) sets out the government’s long term approach to protecting and enhancing the environment. The vision at the heart of the plan is that we will be the first generation to ‘leave the environment in a better state than we found it’.

We are pleased that this is highlighted and that broadly the Environment Strategy will support the government’s 25 Year Plan. However we consider there is scope to review the content of the plan to ensure delivery of national environmental objectives.

The Environment Agency has a key role in the environment sector and delivering government’s 25 Year Environment Plan. We are a delivery body (for environmental projects and flood risk infrastructure), regulator and statutory advisor on a range of issues including flood and coastal erosion risk, water quality, the natural environment (particularly water based habitats), waste, the Water Framework Directive as well as wider climate change mitigation and adaptation.
Recently the Environment Agency set itself the aim of becoming a ‘net zero organisation’ by 2030. Meeting this goal will require the organisation to go beyond what is set out in the Paris Climate Change Agreement to reduce emissions and mitigating any remaining emissions as a result of operational activities. To meet this challenge we recognise that issues cannot be tackled in isolation and that we need to work with other stakeholders to reach these ambitious goals as part of a collaborative approach. As such we are keen to work closely with the Council to align priorities within this agenda.

From the above context, our main comments to the draft plan are set out below.

**General Comments**

It would be useful to have additional narrative on the scope and status of the Environment Strategy. Currently it is unclear on whether it is a Strategy for the whole of Cheshire East (the environment and the people that live there) or it relates solely to the functions of the Council.

The Strategy provides an overarching summary for the six goals identified and subsequently ‘sign posts’ to various strategies/projects which form the ‘action plan’. What is not clear is how the outcomes from the various strategies will contribute to the six goals or the overall target to become carbon neutral by 2025. Ideally, the wider Environment Strategy should identify the specific actions from these studies to provide a clear framework against which delivery outcomes can be agreed. Currently it is reliant on the various strategies being developed and as a result may not serve as providing a wider framework for which decisions, projects and delivery can be measured against. This is essential if the 2025 target is to be realised. We would recommend that each section should have priority actions that relate to outcomes that Council needs to achieve and the outcomes of the 25 Year Environment Plan.

To be able to understand progress against the Environment Strategy we would welcome consideration of targets on which the strategy can be measured against. This may also help inform any outcomes that are considered for the priority actions (see comment above). Currently there is reference to overarching commitments (e.g. review transport fleet and journeys by staff and promote low carbon alternatives) but
this does not provide a baseline of where the Council will need to get to in order to meet the 2025 carbon commitment.

Wider cross cutting issues of ‘skills’ and ‘investment’ do not appear to have been covered as part of the strategy. These are important foundations on which the Council will need to rely on if the carbon target is to be delivered. They are also intrinsically linked in that any investment in the wider environmental sector, can also act as a stimulus for additional skills and job creation.

**Introduction**

We welcome the 6 goals that have been identified as these support the objectives of government’s 25 Year Environment Plan.

As noted earlier this section would benefit from further context/clarification on whether this is a strategy for Cheshire East as a whole or for Cheshire East Council and its functions.

In either this section or the specific sections on the goals, it would be useful to provide baseline evidence on the climate change issues/associated pressures that Cheshire East is facing at a spatial level that are driving the climate and environment emergency (e.g. flood risk, environmental quality indicators, UK Climate Change Projections, air quality). This could be supported by visual maps/infographics to help present the issues to the reader.

Paragraph 3: we would suggest mitigation should also be included as well as adapt. I.e. to ‘both adapt and mitigate the extent of change in the long term’

It is noted that the strategy complements the Council’s economic strategy as ‘an attractive and sustainable environment is inextricably linked to quality of place’. The links between the natural environment and investment should be strengthened in this section. A good quality environment not only provides ‘quality of place’ benefits but it can also attract inward investment and improve productivity of the people that live there (e.g. a more healthy and resilient workforce, improving resilience to climate pressures). In this context, the role of ‘natural capital’ should also be referenced.
A Carbon Neutral Council by 2025

It is clear that the Council are making the necessary step changes to look at carbon emissions across its operations. As noted earlier it would be useful to have specific targets identified across the sectors that have been identified (e.g. baseline of current low emission vehicles and overall target for 2025, renewable energy targets, current EPC ratings etc). Whilst we understand some of these need to be developed through the over-arching carbon strategy, you would expect further iterations of the Environment Strategy to reflect these.

Paragraph 4 – some of the wording in this paragraph should be strengthened so that there is firm commitment to meet the 2025 target. E.g., ‘we will look to use 100% renewable energy targets’ should be amended to ‘we will use 100%’.

Paragraph 6 refers to the Council auditing the use of resource and waste produced in order to become more sustainable. We would encourage the Council to consider building wider carbon considerations into existing procurement processes/frameworks so that this issue is already embedded into operations at an early stage. A useful example would be the need to consider embodied carbon as part of the supply chain. This could also equally apply to the design framework for projects and wider application of green infrastructure as part of any final design (ensuring net gain is applied).

We support paragraph 7, which outlines that the Council will seek to offset any residual carbon impacts through the development of wider green infrastructure. Where these are targeted against certain ecosystem services (pinch points) the benefits to Cheshire East and its people/wildlife can be maximised (E.g. tree planting focussed in areas of poor air quality, natural flood management techniques in areas which have surface water drainage issues). The GI Strategy for Cheshire East would provide this context and we would welcome specific reference to this and the required actions as part of this paragraph. As part of the urban GI interventions, the greening of buildings should also be considered.

Carbon literacy training is not mentioned in this section and it would be useful to understand if this is something the Council has considered for its staff and
operations. Carbon literate citizens can realise a typical carbon savings of 5%-15% per person. There is also free online learning resource from Defra that could be a useful training resource.

Whilst there is mention of the LED programme, the issue of wider energy efficiency retrofit for existing buildings and infrastructure is not mentioned in this section. According to the UK Green Building Council, the built environment contributes to around 40% of the UK’s total carbon footprint and 80% of buildings that will be around in 2050 have already been built. Therefore a major priority should be decarbonising our existing stock and this does not only have to be focussed on energy demand but can also consider the wider issue of ‘greening our buildings (e.g. Sustainable Urban Drainage Systems).

We support the commitment to produce a ‘carbon reduction roadmap’. The natural environment has a critical role to play in terms of carbon sequestration and data from ONS national capital accounts shows the estimated annual value to the UK of ecosystem service flows related to carbon sequestration to be approx. £1.7 billion. As such, we would encourage the Council to consider including natural capital within the scope for this work.

Government is currently consulting on the Future Homes Standard, which is looking to uplift standards for building regulations. The Future Homes Standard will require new build homes to be future-proofed with low carbon heating and world-leading levels of energy efficiency; it will be introduced by 2025. As part of the consultation, they are also reviewing whether to commence the amendment to the Planning and Energy Act, which will restrict Local Planning Authorities from setting higher standards for new homes. Clearly this may have some implications for the Council and the commitment to becoming ‘Carbon Neutral’. This will need to be considered as part of the carbon reduction roadmap.

Reduce Waste and Pollution

We would welcome reference to the ‘Resource and Waste Strategy for England’ to understand how the Environment Strategy support national priorities. The national resource and waste strategy provide the clear longer-term policy direction in line with
the 25 Year Environment Plan. Notable themes, which do not appear to be picked up by this section of the Council’s strategy, includes the issue of ‘avoidable plastics’ and waste crime.

This section refers to the key aims and objectives for the municipal waste management strategy, however it would be useful for the strategy to be more specific and set these out in the main report or accompanying appendices.

This section could also be broadened considerably to take into account wider forms of pollution, particularly those the Council have a statutory role in contributing towards improving, such as reducing pollution to the water environment. Not only does this support the North West River Basin Management Plan, but also contributes towards the 25 Year Environment Plan.

**Improve Air Quality**

This section refers to the impacts of poor air quality on human health but there is no reference to the natural environment and associated benefits (including natural capital) for improving air quality. Given this is an environment strategy we would recommend that this is included. As noted in our comments for carbon reduction, the natural capital role of the environment in improving air quality is significant. For pollution removal, ONS data shows the estimated total annual values of PM10 and SO2 absorption by the UK environment in 2006 and 2012 are £5.01 billion and £4.51 billion respectively (of which PM10 accounts for 99.9%). This should also be considered as part of the review of the Air Quality Action Plan.

The final paragraph refers to measures from the current ‘Air Quality Action Plan’ but does not define what these are or how they would directly enable the Council to meet the 2025 target. We would welcome further clarity on this.

**Increase Sustainable Transport and Travel**

Cross-reference to the role of Green Infrastructure in providing active travel routes should be strengthened in this section. The way people, goods and services move and the choice of transport/technologies available is a key consideration if we are to move towards a sustainable/low carbon transport system. Green and Blue
infrastructure can enhance transport corridors and provide additional benefits (e.g. air / water quality) whilst green/blue corridors such as our waterways already provide the necessary infrastructure to encourage more active and sustainable methods of transport. Strengthening these links are particularly important in places where there is lack of provision for non-motorised users. Being able to access good quality green/blue space is essential to the health and wellbeing of people who live within Cheshire East.

**Sensitive and Sustainable New Development**

The Environment Bill will introduce a mandatory ‘Net Gain’ requirement within the planning system. Where there is reference to ‘no net loss’ we suggest this is removed from this section to ensure it is strengthened to reflect a ‘net gain’ approach only. Where there are Council led developments these should be incorporating this requirement at the very start of procurement/design and feasibility processes.

Decisions made by the council also have an impact on the wider environment, including environmental risk. The role of sustainable development in mitigating these issues should be recognised.

**Protect and Enhance Our Natural Environment**

We welcome a specific goal within the Environment Strategy on the Natural Environment so that it will play a central role in meeting the 2025 commitment.

The narrative in this section is focussed on the natural environment and GI, but places little emphasis on wider resilience issues. If not covered within the introduction, we recommend that this section also includes an overview of current/predicted natural environment stresses associated with future impacts of climate change. In particular, the increased risks of extreme flood events and higher summer temperatures. Baseline evidence from the 2018 UK Climate Change Projections shows several indicators, which are consistent with the expected effects of a warming climate. In comparison to the last decade:

- The average temperature has been 0.3 degrees warmer.
- Winters have been 5% wetter
- Summers have also been wetter (11-13%)
- Rainfall on the wettest days has increased (17%)

In relation to this, we would also like to see a stronger focus on the issue of flood risk and how the strategy will seek to address future climate/environmental risks associated with flooding. The 25 Year Environment Plan supports the approach of utilising natural flood management measures as part of future plans and programmes and this should be included.

More broadly, it would also be useful to include a strategy approach for wider flood risk investment, which will be essential if the Council wants to be resilient to future climate risks. The resilience of places and the ability to recover from flood risk stresses have a direct impact on the local economy and associated productivity. This is particularly the case where there are areas of high economic activity, which result in supply chain impacts and where more vulnerable households are affected and/or densely populated areas.

The Environment Agency has a statutory overview role in relation to flood risk management and is also responsible for overseeing the Government's flood and coastal risk management programme as a key 'infrastructure provider'. This programme runs in six year cycles and we are currently nearing the end of the current cycle (2015/2016 – 2020-/2021). This identifies both surface water (Lead Local Authority or other Risk Management Authority) and fluvial (Main River) (Environment Agency Lead) capital schemes. The schemes are funded according to how they score using the Grant in Aid (GiA) partnership Funding formula that takes into account levels of flood risk, deprived communities and external funding contributions. Grant monies awarded by Government for flood risk capital projects often require partnership contributions and this is the case for schemes within Cheshire East. This funding gap remains a significant challenge to delivery.

Again we would welcome a stronger reference to natural capital given it is a core principle of the 25 Year Environment Plan and as noted in earlier comments the natural environment has a critical role in climate regulation (particularly the economic
benefits). The National Industrial Strategy also recognises how a healthy and resilient natural environment helps deliver its 5 foundations of productivity, such as supporting a healthy and productive workforce, attracting inward investment by making places more pleasant to live and work and ensuring the economy and infrastructure is resilient to future climate change impacts so that local businesses can thrive. In support of this, there is external evidence that demonstrates that a good quality natural environment in urban areas provides an uplift to local economies and improves people’s health and wellbeing. (E.g., the Greater London Authority have found ‘A correlation exists between urban areas with a low number of green spaces and higher levels of deprivation’).

Paragraph 3 – it is unclear what is meant by a ‘co-ordinated approach’ to the management of green infrastructure. Is this efficiencies in resource and management? Having measures in place to address long term management and maintenance of any greenspace asset is a vital component if ecosystem services are to be maximised. It is currently unclear within the strategy how this issue will be considered.

Whilst general maintenance of our main rivers are the responsibility of riparian landowners, the Environment Agency operations teams undertakes essential management and maintenance of the main rivers within Cheshire East. As such, we would welcome discussions on how a co-ordinated approach could be considered when looking at our river systems as key GI habitats.

There is no recognition of the importance of the water environment in Cheshire East and the role it has to play in creating resilient communities, as a source of drinking water, process water, supporting agriculture and cooling towns and supporting biodiversity. It would be useful to see that there is an understanding of the importance of both water quality and water quantity within this section.

In this context, we would welcome additional reference to the role of river systems and the water quality of the network, with particular regard to the Water Framework Directive (WFD) and current status of waterbodies in Cheshire East. Regulation 17 of the Water Environment (WFD) (E&W) Regulations 2003 places a duty on each public body including local planning authorities to ‘have regard to’ the statutory River
Basin Management Plan relevant for their region in order to meet the requirements of the WFD and water body objectives (this is also strategy priority 4 in the Council's Local Plan Strategy).

In terms of water body objectives, there are 23 water body’s (wholly or partly) in Cheshire East that are predicted to achieve an objective less than ‘Good’. The biggest contributions to this relate to urban diffuse pollution, agriculture and land management and the water industry. Climate change will likely exacerbate these issues further, with more rainfall increasing run-off, flood risk and also impacting on waste water infrastructure. The planning system in particular will have a key role to play in managing land management issues going forward. More information on water bodies, classifications, Reasons for Not Achieving Good (RNAG), objectives and can be found online via the Catchment Data Explorer.

The Environment Agency would be happy to provide additional data and evidence on this issue.

In a planning and regeneration context, early consideration of embedding green infrastructure in the design of development to maximise ecosystem service benefits should be a key objective for the Council in its role as a Planning Authority. This can range from the greening of buildings, utilising a natural approach to flood risk management and using key GI networks for active travel. Reference to the ‘Design Guide’ is made in paragraph 6.2 but it is not clear on how this supports this part of the strategy so it would be useful to make this more explicit.

**Measuring Progress**

As noted in earlier comments it would be useful for the strategy to specify the key outcome indicators on which progress will be measured against. These should be explicitly related to the need to meet the 2025 carbon commitment.

We trust that you will find these comments useful to help develop the strategy and look forward to continuing to support the Council in order to meet its ambitions for 2025.
The Tatton Group

Strategic goal 1 - Cheshire East will be a Carbon Neutral Council by 2025

The council has already made significant progress towards becoming carbon neutral, including by reducing its CO2 emissions by 42% since 2009, and by installing new LED (Light Emitting Diode) energy efficient street lighting across the borough.

It will work towards becoming carbon neutral by 2025 in various ways, including by using 100% renewable energy tariffs, by investing in alternative heat and power networks, by reviewing its transport fleet and journeys by staff to promote carbon alternatives, and by developing the green infrastructure within the borough.

An over-arching Carbon Strategy will be produced to establish the baseline carbon footprint for the council in 2019.

How strongly do you agree or disagree that Strategic Goal 1 is...

Relevant AGREE

Comprehensive STRONGLY DISAGREE

Good AGREE

Strategic Goal 1 - Priority actions

The priority actions for Strategic Goal 1 are:

• Develop an over-arching Carbon Strategy for the Council to achieve its carbon neutral aims by 2025 and to encourage all businesses, residents and organisations in Cheshire East to reduce their carbon footprint - By April 2020

• Trial alternative fuel vehicles for our fleet vehicles to reduce transport related carbon emissions - By April 2020

• Embed carbon reduction into Council procurement, purchasing and facilities management - By April 2020
How strongly do you agree or disagree that the above Priority Actions are the right areas to be focusing on in order to achieve Strategic Goal 1?

NEITHER AGREE NOR DISAGREE

Comments

The Tatton Group welcomes the Cheshire East Council climate change motion that was passed earlier in the year however strongly feel that overall the Environmental Strategy in its current form lacks ambition.

In particular, this section of the strategy which focuses solely on the Council’s own operations.

To be a carbon neutral council by 2025 is to be encouraged, and as it is within the Council’s control ideally very achievable, however we believe Strategic Goal 1 and the scope of the priority actions lack ambition and vision. For example, trialling alternative fuel vehicles we believe should be a given and would have welcomed actions to address bigger issues such as grid decarbonisation, an audit of potential renewable energy sources, the completion of a local area energy plan or actions to accelerate retrofitting of our housing stock to improve energy efficiency and in particular partnering with large landowners to deliver in borough offsetting. We would urge the Council as a matter of urgency to review this Strategic objective and set out a bigger vision with clear targets to mitigate climate change for the whole of our sub region. The scale of the challenge ahead requires that the strategy brings together a set of bold plans, setting out what we all need to do, and the local and national policy framework required to tackle these challenges and capitalise on the opportunities and benefits that will come from taking action. We note that the Greater Manchester 5-year Environment plan has done this clearly and effectively. This approach and level of detail appears appropriate for CEC, who (in our opinion) rightly, have placed environment and climate change at the top of their political agenda.

Additionally, we would strongly advocate an aligned approach at a regional level. Whilst Cheshire West and Chester have a significantly greater challenge to reach Carbon neutral, there are areas, particularly around environmental net gain, that need a landscape and catchment scale approach to be meaningful or effective. The
Tatton Estate is about to embark on a 20 year Estate strategy and would be keen to ensure that within this process we can materially contribute to the sub region reaching carbon zero. Cheshire is home to a number of large Landed Estates who own land across the two sub regions and who could be very effective partners in delivering against a Carbon strategy, especially where both Authorities have joined up thinking where nature and carbon sequestration is concerned.

In its current draft form, we do not consider Strategic Goal 1 to be an adequate response to a state of climate change emergency, and the UK’s overall commitment to the Paris agreement.

We would therefore ask that the Council urgently investigate working on Climate Change on a Subregional basis. Failing that, we urge that at least this document from Strategic Goal 1 onwards is changed to cover the whole of the sub region and the next step sets an emissions baseline for the whole sub region to be able to effectively prioritise actions to achieve carbon zero.

**Strategic goal 2 - Waste and pollution will be reduced**

**Brief summary of Strategic Goal 2 - Waste and pollution will be reduced**

The goal here is to produce less waste and as far as possible use it as a resource, by focusing on waste reduction, reuse, recycling and disposal, as well as on litter and street cleansing.

How strongly do you agree or disagree that Strategic Goal 2 is...

**Relevant** AGREE

**Comprehensive** DISAGREE

**Good** TEND TO AGREE

**Strategic Goal 2 - Priority actions**

The priority actions for Strategic Goal 2 are:

- Launch food waste recycling - By Jan 2020
• Introduce Recycling on the Go street litter bins in key town centres - By Oct 2020

• Review and update the Council’s Municipal Waste Management Strategy - By Mar 2020

How strongly do you agree or disagree that the above Priority Actions are the right areas to be focusing on in order to achieve Strategic Goal 2?

DISAGREE

Comments

The Tatton Group supports the development of a waste hierarchy as proposed in this section. However again for this Strategic goal to be ambitious it needs to broaden its remit as it is only addressing part of the problem. There is no reference to waste prevention. We would look to the Council to review this goal to develop a zero waste strategy including optimising the potential of utilising rescue food and incentivising businesses to reduce or eliminate plastics and non-recyclable materials from their products, services and individual business operations.

Strategic goal 3 - Air quality will improve

Brief summary of Strategic Goal 3 - Air quality will improve

On the whole air quality across the borough is relatively good, however, there are a number of small areas where there are concerns about nitrogen oxide and particulate matter.

The council shall review the Air Quality Action Plan which was adopted in 2018, and which sets the measures for each of the 17 Air Quality Management Areas declared within the borough. 2 additional Air Quality Management Areas shall be declared in 2019.

How strongly do you agree or disagree that Strategic Goal 3 is...

Relevant STRONGLY AGREE
Comprehensive TEND TO DISAGREE

Good TEND TO AGREE

**Strategic Goal 3 - Priority actions**

The priority action for Strategic Goal 3 is:

- Review the Air Quality Action Plan and publish the 2019 Air Quality Annual Status Report - By Sep 2019

How strongly do you agree or disagree that the above Priority Actions are the right areas to be focusing on in order to achieve Strategic Goal 3?

TEND TO AGREE

Comments

Air quality is an important component within the health and wellbeing agenda as well as quality of place although one that is far less of an issue here than in cities. With Manchester Airport’s flightpaths starting and finishing in the borough, it needs carefully weighing against noise and economic growth considerations with broader strategic thinking e.g. steeper take-off angles offset by mitigation may be better than the current shallow take-offs that create a greater noise impact and pollution close to the surface and ecosystems reside. Air quality has been focussed on within the review of the Local Plan part 2, yet little weight given to the effect on economic growth, housing need and the balance with quality of place and noise pollution for example.

Improving air quality cannot be considered in isolation and needs to be part of the whole approach to placemaking as many of the solutions to pollution deliver against a number of priorities. The review of the Local Transport Strategy and Green Infrastructure strategy for example will have a large role to play in achieving this Strategic Priority

As well as a review of the Air Quality Action Plan we would welcome a full business case of proposals to reduce levels of nitrogen dioxide and particulate matter in high priority areas, with clarity as to the scale of ambition and level of investment the
Council is proposing to support this Strategic Goal

**Strategic goal 4 - Increase sustainable transport and travel**

Brief summary of Strategic Goal 4 - Increase sustainable transport and travel

Reducing reliance on private cars, especially single-occupancy cars, and an increase in use of sustainable transport will help improve air quality and contribute to the decarbonisation of the borough. There is relatively high car ownership in Cheshire East with 40% of households having two or more cars against a UK average of 29% - the council will aim to reduce this by offering a range of sustainable transport opportunities to enable travel on foot, by cycle or by public transport wherever possible.

The council will also aim to increase electric vehicle charging infrastructure throughout the borough, to increase the use of electric vehicles.

How strongly do you agree or disagree that Strategic Goal 4 is...

Relevant AGREE

Comprehensive TEND TO DISAGREE

Good TEND TO AGREE

**Strategic Goal 4 - Priority actions**

The priority actions for Strategic Goal 4 are:

- Review and publish the Local Transport Plan - By Oct 2019

- Produce an Electric Vehicle Infrastructure Strategy to increase electric charging infrastructure provision and encourage the uptake of electric vehicle usage - By Mar 2020

How strongly do you agree or disagree that the above Priority Actions are the right areas to be focusing on in order to achieve Strategic Goal 4?

TEND TO DISAGREE
Comments

Whilst the actions in this section are useful, they are not going to be enough on their own to enable a decisive modal shift away from cars in the timescales that are needed. The Tatton Group has re-attached its representations on the Local Transport Strategy and would reiterate the need for a more comprehensive and joined up approach to reduce traffic congestions and encourage alternative travel solutions to residents and commuters. Within this we would support any actions to reduce freight emissions and a modal shift from road to rail and from carbon to zero emissions.

Again, this Strategic Objective cannot be set in isolation and needs clearly feed into quality of place, health and wellbeing, air quality and new sustainable developments. Planning requirements must ensure that new developments have high levels of accessible and well-maintained green infrastructure in a way that is financially viable. A presumption in favour of any development that delivered a net gain could be a game changer.

We would caution about focussing on eliminating use of vehicles which will always be needed but can me made much more sustainable if low carbon, shared etc. For existing as well as new developments however, targeting delivery of local facilities to mitigate the need to travel in the first place needs much greater emphasis and resource – see the work at Poundbury that Cllr Quentin Able recently visited for example.

We are working with landowners, stakeholders, community groups and river trusts to scope an ambitious River Bollin project, building on the River restoration project run by the National Trust but extending the reach to include a continuous green infrastructure corridor with a cycleway running from the Manchester Ship Canal to Manchester airport and beyond. The project aims to create new sustainable transport links, delivering health and wellbeing objectives working with Wythenshawe as well as improving water quality, biodiversity and providing opportunities for environmental net gain and offsetting. We would welcome the opportunity for this to be presented to the council with a view to it being embedded into this Environmental Strategy.
We would support the National Trust’s call for a cross sector partnership to create solutions that would work for a variety of audiences and to accelerate the creation of safe and attractive green routes and innovative transport solutions. To achieve an integrated sustainable transport strategy the Council would need to identify key existing and potential routes and nodes enabling residents to move efficiently across the sub regions and beyond. This could include identifying the potential for electric bikes, to encourage uptake of cycling as preferred mode of transport for shorter journeys, linking in to rail, metro and other key transport nodes with cycle hubs and integrated cycle network.

Within the priority action to produce an EV Infrastructure strategy we would welcome the Council undertaking a comprehensive mapping process and as well as expanding the sub regions EV charging network we would also advocate the development of smart grids.

**Strategic goal 5 - Sensitive and sustainable new development**

Brief summary of Strategic Goal 5 - Sensitive and sustainable new development

New development should provide sustainable, high quality design that minimises its environmental impact, with a focus on delivering quality buildings and the spaces that surround them. This will be led through the Local Plan.

How strongly do you agree or disagree that Strategic Goal 5 is...

Relevant STRONGLY AGREE

Comprehensive DISAGREE

Good NEITHER AGREE OR DISAGREE

**Strategic Goal 5 - Priority actions**

The priority actions for Strategic Goal 5 are:

- Adopt the Site Allocations and development Policies Document of the Local Plan (Part 2) - By July 2020
• Adopt the Minerals and Waste Development Plan (Local Plan Part 3) - By Oct 2020

How strongly do you agree or disagree that the above Priority Actions are the right areas to be focusing on in order to achieve Strategic Goal 5?

DISAGREE

Comments

New development needs to contribute to the ambitions for quality of living and quality of place as expressed in Cheshire East draft Economic Strategy, as well as the environmental aims in this document. The Local Plan provides the right framework of policies relating to climate change, air quality, design, biodiversity, green infrastructure, etc. and we are happy to see this referenced in the strategy. However, we would urge a full, urgent and comprehensive review of the Local Plan in response to the climate change emergency motion as we do not believe there has been adequate consideration in response to the challenges ahead. In particular, consideration of mixed-use communities, density and housing types, mix of construction methods to include carbon zero modular builds, design that reduces heat demand in new buildings integration of community renewable energy generation as examples. To accelerate the roll out of renewable energy on new developments we would welcome specific targets being set such as 20% renewable energy minimum on all new developments and making smart meters in new homes compulsory.

Policies such as biodiversity net gain are important for new developments, and to drive this change when considering planning applications, going forward there may be a case for presumption in favour of any development that delivers net gain.

To support new development we would ask that the various environmental planning policies are collated within this Environmental Strategy as currently they are spread across various planning documents. A priority action could be to clearly set out how such policies will be applied to different types of proposals at different stages in the planning process.
Other priority actions we would welcome within this strategic objective include;

- Implementing a prioritised programme of nature-based climate adaption actions funded by a reallocation of existing CIL and other development related levies

- Undertaking of a full flood risk assessment to ensure future growth aspirations consider flood risk and how to manage the water environment

**Strategic goal 6 - Protect and enhance our natural environment**

Brief summary of Strategic Goal 6 - Protect and enhance our natural environment

We aim to deliver a high quality and accessible network of green spaces for people to enjoy, providing a range of social, environmental, economic and health benefits. We will seek to protect the health of existing ecosystems, encourage the restoration of degraded ecosystems and enhance the biodiversity of the borough.

How strongly do you agree or disagree that Strategic Goal 6 is...

*Relevant STRONGLY AGREE*

*Comprehensive TEND TO AGREE*

*Good STRONGLY AGREE*

**Strategic Goal 6 - Priority actions**

The priority action for Strategic Goal 6 is:

- Produce a Green Infrastructure Plan that guides the approach to Green Infrastructure management and investment in Cheshire East - By Oct 2019

How strongly do you agree or disagree that the above Priority Actions are the right areas to be focusing on in order to achieve Strategic Goal 6?

TEND TO AGREE

Comments
The recent State of Nature report 2019 highlights the dramatic decline in nature as the environment continues to be put under pressure from many impacts. Cheshire is 90% green infrastructure and according to the recent homes England report 42% green belt. Despite agriculture being seen as a small contributor to GVA, the impact of poor agricultural practice on soil and water quality and methane emissions is significant in Cheshire. We would therefore ask for collaboration with the LEP and CW&C and consideration of impact at landscape scale.

We are concerned that this section is so limited and whilst we welcome the GI plan we need a much more comprehensive approach and clear delivery plan if we are effectively preserve and enhance our natural environment.

Firstly, we would urge as an immediate priority that a natural capital audit and account is completed. In other areas the natural capital assessment has provided the basis upon which all other policies are built as economic, social and environmental benefits are all linked. Additionally we need to be able to clearly identify with some granularity (we note the Natural Capital audit completed by Liverpool city region has detail to the scale of a city back garden) if we are to identify where there is the opportunity for environmental net gain, how and where we plant trees for maximum benefit, look at land use as part of natural flood management, soil health for local food production and how we plan new development which is needed around these key assets.

As one of the largest landowners with a long-term interest and legacy in the region we believe we are an integral part of the solution. We would also recommend that the Council works with prominent land owners within the Borough to establish what wider environmental benefits could be achieved via holistic land/estate management. This could involve the preparation of Estate Investment and Environmental Management Plans or SPDs / Development Frameworks,

As in section 5 we would urge CEC to work with stakeholders and third parties to develop an environment fund as part of a natural capital investment plan linked to significant regional natural assets. We would welcome the setting up of a task force to identify new forms of investment which enable nature-based solutions on the ground, from biodiversity net gain and carbon markets, to post-CAP farming
payments and private investment.

**How to measure progress**

The draft strategy proposes that progress will be measured through monitoring actions taken, and reporting the impact through key outcome indicators such as carbon emissions, recycling rates, the biodiversity impact of new development, and air quality.

An Annual Status Report will be produced to report key outcome indicators, update on the progress made in implementing actions, and review the action plan to ensure they reflect broader strategic planning and learning.

If you have any views on how progress against the Strategic Goals should be measured, and what targets should be included, please give your views below:

As a priority we would expect the Council to complete a baseline natural capital account for the sub region. Annual targets and reviews are essential.

**Funding and contributing in future**

Do you think that delivery of the Environment Strategy should be subsidised from local taxation, or should be cost neutral to the council e.g. by relying on government grants and other external funding?

Please tick one box only

- Delivery of the Environment Strategy should be subsidised from local taxation
- Delivery of the Environment Strategy should be cost neutral to the council e.g. by relying on government grants and other external funding
- Don’t know / Not sure

DON’T KNOW/NOT SURE

Are you or your organisation currently contributing to the delivery of any of the Strategic Goals and Priority Actions? How might you do so in future?
Tatton Group and Tatton Estate are contributing to the delivery of many of the Strategic Goals. However, there is little reference or recognition within this strategy of the role partners especially landowners do and can play. For example a review of the planning policies particularly housing densities will enable the Estate and Council to work together to bring forward new developments that deliver against the strategic goals of the Environmental strategy as well as aligning with the aspirations of the next generation, helping address the significant skills shortage threatening the sub regions productivity through a lack of retention of 19-35 year old's.

Final comments

If you wish to add any further comments about this consultation please write in below:

The Environmental Strategy in its current form though based on good principles lacks ambition and detail and we are concerned that it will not deliver the changes that are required very urgently to address the climate change crisis.

To galvanise support and move quickly the strategy needs to have clear actions with measurable outcomes and targets. There is little recognition of the role of partners, residents, and policy in this strategy and these need to be clearly articulated.

Mitigating climate change is a long-term strategy, therefore the Strategy needs to reflect this and set ambitions in line with central government over 20-25 years, irrespective of any outcome of the general election or Brexit, in particular with an immediate comprehensive review of the local plan that has a presumption in favour of development that delivers net gain.

The fact that some of the deadlines in the strategy are already passed, and the limited nature of the objectives, or the lack of reference to some of the recent dramatic flooding experiences does not suggest that this is a strategy that has had due consideration since the passing of the climate change emergency motion

We will reiterate again that we would like to see this Environment Strategy to take a natural capital approach working cross sector and setting the framework upon which
other important strategies such as the recently published economic strategy, local transport review can be framed.

Finally, we would like to see much more thought leadership around the opportunities associated with this agenda and how we may capitalise this. Tatton group offer their support to the Council to further develop this strategy as a result of this consultation.
Responses from Town and Parish Councils

Holmes Chapel Parish Council

1. The introduction (para 3) emphasises the importance of mitigating our impact on man-made climate change. It goes on to say at the local level we have seen ‘increased incidents of flooding and increased impact on the elderly of extreme heat’. Presumably there is a document to support this statement which should be referenced.

2. It is noted that the Council has committed to the target of being carbon neutral by 2025. This seems a particularly onerous objective bearing in mind the Government target of 2050 which in itself leads the world as a commitment. Although the objective is laudable the timescale to achieve it is very short with the prospect that decisions will not be well thought through and investment decisions will be ill judged. It is important that the Council sends out a powerful signal of the importance of the problem but any action should be proportionate and framed within a realistic timescale.

3. Section 2 (para 2) states the CEC achieved targets for reduction of CO2 at 42%. Is there a reference which could be quoted in the document?

4. Section 2 (para 5) The reference to a workplace parking levy for staff may indicate commitment by the Council but seems a very unfair tax bearing in mind so many people would find the use of alternative travel arrangements to the private car difficult. A car sharing bonus may be appropriate or some other more positive nudges.

5. Section 2 (para 7) We would favour the additional tree planting referred to in Section 2. However, our recent experience with Highways department suggests they will make it difficult. Holmes Chapel budgeted to add ten trees along roadway verges but after initially being told no trees were permissible we are now informed it can only
take place if the Parish takes over lifelong responsibility for them. In principle we have no problem with that but our experience is that the greening of the community or absorption of CO2 come second to financial risk by the council.

6. Section 2 ‘Priority action 2’ is to trial alternative fuel vehicles to reduce emissions. Surely this needs to be stronger and state that the action plan is to eliminate fossil fuel vehicles by 2025.

7. Section 3.1 (para1) it is noted that Cheshire East residents produce very high levels of waste per person. Presumably you will identify why this is the case so that any action targets the cause.

8. Section 3.1 (bullet point 4) We support the incineration of waste where possible especially if heat and power are generated but presumably this will increase CO2 generation.

9. Section 3.1 (para 4) We applaud the waste management practices but would like to add that any waste should be dealt with in the Borough. Any waste exported from Cheshire East should only be for re-cycling and no waste should be exported abroad where controls are less rigid.

10. Section 3.2 (para 1) there is reference to fostering local community pride in our towns and villages. We were sorry to see the demise of the ‘Best Kept Village Competition’ this year and would suggest that such a competition in Cheshire East would be a way of fulfilling this objective.

11. Section 5 (para 1) We do not accept the link in the first paragraph between high car and especially two car ownership and air pollution. There are other factors such as the many commercial vehicles on the roads. High car ownership does not necessarily indicate high mileage as many vehicles probably see low individual annual mileages. The high car ownership is a result of the dispersed rural population in an environment with poor public transport links.

12. Section 5 (para 1) Targeting single occupancy cars to encourage car sharing could offer results but it would mean investment in suitable car parking.

13. Section 5 (para 5) The introduction of more electric vehicles is inevitable and
there will need to be a significant infrastructure to cope. Most importantly any new housing should incorporate car charging points and serious thought will need to be given to how all existing properties will have the facility to charge an electric car.

14. Section 5 (para 5) Charging points in public places need to be considered very carefully at this early stage in the take up of vehicles. To some extent installing charging points in public car parks is a good way of indicating the green credentials of the council. But there is a risk that it will be little more than virtue signalling and worse, may make car parking more of an issue in public areas. The likelihood is that by the time there is significant take up of electric vehicles they will cover 300 miles per charge and thus nearly all charging will be done at home or the final destination. This would suggest the main demand will be at work and major leisure destinations and at home. Placing charging points in the middle of Holmes Chapel, for example, will just reduce general parking spaces. We believe a policy needs to be carefully thought through bearing in mind the electric vehicle landscape is going to change dramatically over the next ten years.

15. Section 6.1 (bullet points 2 and 3) contain two expressions which are in need of explanation – ‘seek proportionate opportunities’ and ‘biodiversity metric calculation’

16. Section 6.1 (bullet point 4) makes a positive statement about increasing the number of trees where they are lost on new developments and we applaud this approach. We would also encourage the use of large trees (oak, ash, beech..etc.) in appropriate locations which as well as adding to the appearance of the town and rural scene will be more significant CO2 absorbers in the long term.

Pickmere Parish Council

Pickmere Parish Council considered the draft strategy at its meeting on 5th November 2019 and their primary comment was to express the concern that no mention was made either of HS2 or of Manchester Airport, both of which have considerable implications for an environmental strategy; in addition the Council commented that the Environmental Strategy should clearly be aligned with your Economic Strategy, where again these two projects have considerable implications.
I trust these comments are helpful.

**Poynton Town Council**

Poynton Town Council welcomes an opportunity to make comments in respect of the draft Cheshire East Environmental Strategy 2019. The format of this representation comprises four main elements and a conclusion as follows:

1. The overall vision and environmental strategy at a Borough wide level (goals 1 to 6).

2. The amount and location of new development in Poynton arising from the Local Plan site allocations (Goal 5).

3. The infrastructure capacity required to accommodate the amount and location of development locally, including the impact of recent flooding in Poynton and adjoining areas (goal 4).

4. The impact on the local environment arising from the development proposals of the Local Plan (goal 6).

**1 Overall vision and environment strategy at a Borough wide level**

The consultation document does not make clear by which methods the document has been prepared. Consultation documents from the Borough Council are usually clear as to the manner and scope of document preparation, its context and other relevant factors. Examples of some factors might have included taking into account good practice by other local authorities in drafting such documents, analysing and assessing latest or current targets on different environmental matters, review of the wider policy and legal context, review of existing activities and future opportunities across services and other relevant parties and some assessment of the potential resources the Borough Council will or may in the future be able to undertake its environmental work.

The first part of the overall vision for the Strategy is considered appropriate for the
Poynton area as this part of the strategy (goals 1 to 3) sets out a series of goals each of which Poynton Town Council can support. These are Cheshire East’s ambition for carbon neutrality by 2025, a reduction in waste and pollution and improvements in air quality. All of these goals are relevant to the wider Poynton community in differing degrees of importance, but all are worthy of support for the Environment Strategy including the priority actions listed in the Strategy. However, the second part of the draft Strategy covering goals 3 to 5 respectively cannot be supported for reasons we will set out in this response.

The Town Council can support the ambition of Cheshire East Council to become a carbon neutral authority by 2025. The review of Council transport fleet and journeys by staff to and during work to promote low carbon alternatives is supported. The Poynton Neighbourhood Plan supports improvements for services such as public transport, cycling and walking infrastructure. Poynton Town Council has also been innovative in supportive funding for sustainable transport investment including the “shared space” provision in and around the town centre. As the responsible public transport body, Cheshire East Council should play its role in responding to the transport challenges facing Poynton town due to the substantial increase in planned development arising from the Cheshire East Local Plan.

2  **Amount and location of new development in Poynton remains inappropriate (goal 5)**

Strategic goal 5 concerns sensitive and sustainable new development. The brief summary of Strategic Goal 5 in the online consultation states as follows:

New development should provide sustainable, high quality design that minimises its environmental impact, with a focus on delivering quality buildings and the spaces that surround them. This will be led through the Local Plan.

‘Exceptional circumstances’ are required to remove land from the Green Belt, usually with the intention of future development, through the local plan process. The circumstances in which the proposed amount of additional development proposed in Poynton increased from around 200 houses to over 700 homes remain a significant concern to both the Town Council and the wider community. During Local Plan
preparation, site allocations were to be made in order to meet objectively assessed needs unless specific policies in this framework indicated development should be restricted. Land designated as Green Belt is given as one of the areas to which restrictions apply. The adopted Local Plan 2017 did not and does not show or explain how the increase in housing and employment land proposed in Poynton was compliant with the national guidance at that time.

The uplift in the amount of development for the northern part of the Borough (including Poynton) was unjustified as there was no specific or satisfactory explanation about how the proposed amount of additional development had been derived. At a strategic level, the downward forecasts for growth in the economy over the next few years were substantially different from the levels of growth assumed in the Local Plan evidence documents over the previous two years. The reasons included the slowing down of the economy, the referendum vote to leave the EU and the slowdown in the construction industry. These issues (and others) both individually and collectively led to the conclusion that the growth rates anticipated in the Local Plan were a huge overstatement of the potential economic growth in Cheshire East over the 15 years period.

The Local Plan proposed uplift from 200 to nearly 700 proposed dwellings within the Plan period, without any effective assessment of the additional impact on the town. This included the necessary infrastructure to be delivered to serve that amount of development. This is particularly the case as a new housing estate of nearly 1000 houses was and still is currently being built on the former Woodford Aerodrome site within Stockport. This site lies immediately next to Poynton and indeed part of the aerodrome lies within Poynton. Poynton is the nearest town to this site and new residents of this development look to Poynton for many of their local services and facilities.

The development strategy in respect of Poynton was and is unsustainable. No additional infrastructure was proposed to support the three new proposed edge of town strategic housing sites. Of the sites allocated, four out of five (which includes the safeguarded land site) are beyond reasonable walking distance of either railway station in Poynton. The majority of longer travel movement within and to other areas will therefore be by private car. This does not fit with goal 5 of the Environmental
Strategy and indeed contradicts it.

The allocated sites and amount of development are not viable over the life period of the Plan to 2030. In Poynton, the allocated strategic and safeguarded sites require significant investment in infrastructure to meet basic tests set out in national planning guidance. National planning policy regarding infrastructure requires local planning authorities to work with other providers to assess the quality and capacity of infrastructure and its ability to meet forecast demands. This is substantially retained in current guidance. The Cheshire East supporting evidence regarding infrastructure to the Local Plan examination was inconsistent. Three specific examples for Poynton in Cheshire East Local Plan documents were noted: the deficiency of secondary school places identified as a high risk, the facilities at the existing Poynton Leisure Centre are noted as needing improvement for health and wellbeing and there was a new primary care requirement for the town.

The Local Plan is not soundly based and was a strategy for providing further housing and employment without the supporting infrastructure. A comprehensive development strategy was required in the form required in national guidance. For example, the plan should have been positively prepared in conjunction with Stockport Borough Council which immediately adjoins Poynton to the north and lies within the Greater Manchester sub-region. The amount of development in North Cheshire had not been foreseen (due to its Green Belt location) when major infrastructure works in the areas were being planned such as the A6 to Manchester Airport link road then under construction. There is a disconnection between the two authorities which was very evident from the Local Plan evidence. Stockport Borough was clearly concerned about the impact on its residents and businesses arising from the Cheshire East Local Plan.

The increase in the amount of development proposed for Poynton was inappropriate arising from two substantial planning matters. Firstly, the town is an inset into the North Cheshire Green Belt and there was a failure by the Borough Council to accept and understand the implications of this status. Secondly, the capacity of the town of Poynton to cope with the amount of development proposed is very limited due to the wide range of infrastructure and other constraints. It is more than 3 decades since any estate type development has occurred in Poynton. Potentially, over 100 houses
per year across three strategic sites could be built in Poynton within 5 years. The
town does not have the physical capacity or infrastructure to accommodate this
amount of construction and increased traffic.

In terms of sustainability, the allocated strategic sites are all on the periphery of the
town and within former Green Belt. None of the Local Plan evidence addressed
existing or potential traffic and transport issues within the town or the potential
impact of this amount of new development. The majority of this traffic will be car
borne due to very high levels of car ownership locally, the proximity to the
Manchester conurbation for a wide range of employment and other services and the
peripheral position of both Poynton railway stations on the edge of the town.

The five allocated strategic sites were made at the request of their owners or
prospective house builders. However, in terms of deliverability, no comprehensive
assessment either for the town as a whole or for each strategic site appears to have
been undertaken of the additional infrastructure requirement. This is particularly the
case in Poynton as many facilities and services have not been updated or improved
for more than 40 years. In terms of being justified by evidence and soundly based,
Poynton Town Council considers the Local Plan still fails to meet the expected
requirements set out in guidance and legislation.

The Local Plan itself contains planning policies for each of the allocated sites,
intending that these would seek to apply detailed guidance as to the detailed
planning criteria to be applied at the planning application stage. The three housing
sites allocated in the Local Plan have been subject to planning applications. However, in terms of compliance with the relevant planning criteria set out in the
Local Plan it is the Town Council’s experience as a statutory consultee on these
planning applications that the Borough Council has failed to apply and adhere to its
own adopted policies when granting planning permissions on these sites to date.

Paragraph 6.1 of the draft Environment Strategy states that the Local Plan is “a
powerful tool for protecting and enhancing the environment of the Borough”.
The Town Council cannot agree with this contention and will produce evidence if required
to support this view. In particular, the manner in which the amount and siting of
proposed housing development has been selected neither protects nor enhances the
environment of Poynton. On the contrary, much of the proposed development will destroy existing habitats, trees and open spaces. More importantly, Cheshire East Council in making planning decisions on planning applications for these sites has set aside its own adopted Local Plan policies in some cases to grant planning permission in support of the development. The Borough Council has either chosen to ignore some of the site criteria set out in the relevant Local Plan policy or has given the local environment matters set out in the relevant policy limited weight in the decision making process.

Based on this material, Poynton Town Council cannot support goal 5. Indeed, the Town Council would welcome a review of the Local Plan 2017 to address the many outstanding planning issues arising from the adoption of that Plan.

3. Infrastructure capacity to accommodate further development (goal 4)

Throughout this submission, we have emphasised the concerns that the Town Council has about the short to medium term infrastructure impact that will result from the likely amount and location of new development. The Town Council has prepared a Neighbourhood Plan which was subject to a successful referendum in October 2019. As part of that Neighbourhood Plan work, the Town Council has collected a considerable amount of evidence across a wide range of matters. It is disappointing that with regard to infrastructure, this Environment Strategy only addresses at goal 4 matters of transport and travel. Whilst this is a relevant and current environmental matter of concern for the town, there are also other concerns.

The purpose of this part of the submission is to address, as an example, one particular issue which has arisen during the recent summers of 2016 and 2019. There was severe flooding in and around Poynton in June 2016 and July 2019. In particular there is a link to goal 5 in that our submissions on the Local Plan and more recently on the 2019 event it has been made very clear to Cheshire East Council that flooding is an important environmental issue for the whole town including the strategic and safeguarded sites proposed for the Hazelbadge Road, Sprink Farm and the Woodford aerodrome sites.
Cheshire East Council have liaised with the Environment Agency and United Utilities on a response to both the floods. There have been well-attended drop-in public meetings on both occasions organised by Cheshire East and the Environment Agency in liaison with the Poynton Town Council. Detailed information regarding the number of homes which flooded and their location is available from Cheshire East and the Environment Agency. The Town Council has many photographs taken by councillors and members of the public during these flooding events. Flooding is potentially caused by global warming and climate change, both of which should be major environmental concern for a Borough Council wide strategy.

In terms of the Environment Strategy. It is important to seek to understand some of the reasons for these flooding events. Surface water and flooding of highways can arise from a variety of factors either in isolation or working together.

For Poynton, the main contributory factors appear to include the following matters:

1. Geology and soil types: in Poynton, clay is more predominant as opposed to sand or sandstone and is not as permeable to allow natural base flows in the ground which can lead to more saturation in the soil above the clay layers which leads to more surface water run-off.

2. Surface water flooding is caused by overland flow during periods of sustained or heavy rainfall which may itself be a consequence of climate change. Poynton experienced such events in the two recent summers of 2016 and 2019 which caused ponding of water where it became obstructed and collected in lower lying areas.

3. Local drainage capacity and infiltration was unable to cope with the volume of water experienced.

4. Regular maintenance of watercourses and culverts is essential to mitigate the impact of other factors especially high rainfall. Moving forward, it is unlikely that appropriate maintenance will be available.

5. Groundwater flooding can occur when the water held underground rises to a level where it breaks the surface in areas away from usual channels and drainage pathways.
6. Highway gullies can become blocked and left until the routine maintenance date unless they are causing a health and safety issue where they may be prioritised as urgent gulley cleansing works. Cheshire East Council develop a policy of regular preventative maintenance to clear blocked grids both in terms of fallen leaves and other debris, blockages from the pipes across the whole borough.

7. The risk of surface water flooding increases as the amount of built-up area and the associated area of impermeable hard surfacing extends. The increase in car ownership has led to increased paving of front and side gardens which increases the surface water run-off.

8. Fluvial flooding occurs when the capacity of a watercourse is reached, causing water to spill out of the channel into nearby areas. In some areas the surrounding floodplain of the river may be undeveloped or have flood compatible uses, but in some areas development has occurred within these floodplain areas. In Poynton, the brooks are a potential source of this type of flooding.

In terms of flood risk, it is also helpful to consider wider evidence as well as the recent flooding and potential causes. This is particularly the case given that the northern and eastern part of Cheshire East Borough are within the river corridors flowing down from the Peak District/Pennine areas across the Cheshire Plain and Greater Manchester.

The national map of Flood Risk areas in England and Wales is maintained by DEFRA and the Environment Agency. Ten areas are identified as at significant risk which includes the Stockport Borough area within Greater Manchester. The Flood Risk Management Strategy for Stockport which follows on from designation as risk was published in February 2016. The strategy sets out an overview of flood risk within the Stockport Borough from all sources. A plan within that document shows links with the adjoining parts of the former Macclesfield Borough Council area including Poynton. The strategy confirms that these northern areas including Poynton contribute to flood risk within Stockport.

To conclude, it can be seen that a combination of location, ground conditions, increasing development, surfacing over of gardens and natural areas and other
factors all contribute to the risk of flooding within Poynton. The implications of recent
flood risk for Poynton with the existing amount of development are a major concern.
The Town Council is extremely concerned about the implications of the amount of
development proposed in the Local Plan for flooding. The Town Council has sought
reports from the Borough Council and Environment Agency as to how the summer
events of recent years may not be repeated and that appropriate mitigation and
management works are scheduled to avoid a recurrence.

This example has demonstrated one aspect of a recent failure of infrastructure
provision and the consequences for future planning of all types of development. It is
clearly a major environmental concern in Poynton, if not the most important one to
the local community.

Flood risk receives only scant coverage in the draft Environmental Strategy with only
two specific references neither of which relates to the list of Priority Actions. Cheshire
East Council is the Lead Local Flood Authority (LLFA) for the Poynton area
and as such has legal obligations. The Town Council notes that the Environment
Agency has produced tools to help LLFAs consider the impacts of climate change on
sources of local flood risk with a view to helping LLFAs to develop their local flood
risk management strategies.

As a LLFA, the local flood risk management strategy must:

• assess the local flood risk
• set out objectives for managing local flooding
• list the costs and benefits of measures proposed to meet these objectives,
  and how the measures will be paid for.

Poynton Town Council request that the flood risk management strategy should form
part of this Environment Strategy. Flood risk is a major environmental concern in this
area and greater urgency is needed as flooding is a major risk to life and the future
of the town. Within north east Cheshire (including Poynton) this strategy should then
be added to the list of Priority Actions for the overall Environment Strategy.
4 Managing the environment in terms of nature, heritage and beauty of landscape (goal 6)

The impact on the local environment arising from the development proposals of the Local Plan will have considerable detrimental consequences. At the town wide level, Poynton now has a wide range of Neighbourhood Plan policies addressing environmental matters. As a minimum Town Council requests that in making decisions on planning applications, the Borough Council as the local Planning Authority take full account of both the policies of the Poynton Neighbourhood Plan and the relevant environmental aspects of the many policies affecting Poynton town in both the adopted Cheshire East Local Plan and the emerging Site Allocations Development Policies document.

The Town Council would support Priority action number 12 concerning the proposed Green Infrastructure Plan. However, in order to deliver such a plan the Borough Council should give full weight to all the relevant environmental policies set out in the main Borough level policies (the adopted Local Plan and emerging SADPD) and also those policies in made Neighbourhood Plan for the environment in towns, villages and rural areas. As drafted, the Environment Strategy makes no reference to neighbourhood plans which comprise part of the statutory Planning framework within Cheshire East and against which many environmental decisions are taken.

Full weight should also be given in terms of managing the environment in respect of nature, heritage and beauty. National Planning Policy Framework (NPPF) 2019 re-emphasises that an environmental objective is one of the three overarching objectives to create sustainable development along with social and economic objectives. In both its planning decisions and policy and plan making, the Borough Council should take into account the impacts and consequences on the environment of its decisions. Since the adoption of the Local Plan in July 2017, the Town Council has raised many concerns on a wide range of environmental matters (both through the planning process and beyond). Whilst the production of a Green Infrastructure Plan is to be welcomed, there have been many situations in which limited weight has been given to environmental factors and concerns by the Borough Council. In order for this goal of the strategy to be achieved, it is the Town Council’s view that within
the proposed five year strategy period (2019 to 2024) many other environmental aspects will continue to be given limited weight by the Borough Council to the detriment of nature, heritage and beauty. Poynton is a town lying within the countryside as recognised by its status as a town inset into the North Cheshire Green Belt. The town also has an important industrial heritage to retain and protect. A far wider and through review of managing the environment within Cheshire East is required than is presented in this first strategy.

Conclusion

Poynton Town Council welcomes in principle the first Environmental Strategy being prepared for the Cheshire East Borough. At a Borough wide level, the Town Council supports the overall vision of the strategy and its application to Cheshire East as a large diverse unitary local authority. The first three goals of the strategy are all applicable to Poynton and accordingly the Town Council support these goals and the supporting priority actions.

With regard to goals 4, 5 and 6 however, the Town Council cannot support the goals in the manner intended in the strategy. This situation arises from the decisions taken and other actions taken by Cheshire East Council in recent years on a wide range of planning and environmental matters. These relate in particular to the Cheshire East Local Plan and subsequent decisions made on a range of planning applications including for the large strategic sites. As set out in this response, the Town Council consider that the combination of planning policies and other decisions for the Poynton area have been and will continue to be detrimental to the environment of the town. This is in spite of the recent very successful referendum result for the Poynton Neighbourhood Plan. Many policies for the Neighbourhood Plan seek to enhance and protect the environment of the town and to also mitigate the impact of Borough decisions and actions, some examples of which have been set out here. Further examples can be provided if required.

The Town Council consider that goals 4, 5 and 6 of the Environmental Strategy are an attempt to retrofit the strategy to the planning decisions made by the Borough Council over the last decade. What is required instead is a genuinely open and transparent strategy which addresses the matters raised in goals 4, 5 and 6 in which
the local environment is given more priority than to date.

**Sandbach Town Council**

The goals are admirable and will have to be monitored to establish if the council is on course to establish its goals of Carbon Neutrality. The date of 2025 at least allows the council to adopt a strategy over a number of years which manages the reduction of Carbon at a more achievable rate.

- Action point 4 the launch of the food waste recycling initiative throughout East Cheshire. Some concerns have been made about this process using existing technology but CEC have made the process roll out transparent and we are satisfied that the process that the council is moving to will be fit for purpose. The plant at Leighton will be open January 2020 to receive the first waste and will be operational at the time of the first deliveries to the site.

- The ability of CEC (Action point 7) to establish the accurate recording of Air Quality has been of some concern so the statement that the council will improve the Air Quality within the area of Cheshire East will require some real change in process and policy.

- The idea that new developments will be sensitive and sustainable is a goal we all support but as shown in the past will depend on the will of central government to support the local authority against the obvious pressure of the demand for all types of housing set by government in recent years. In that respect Action points 10 -12 show the required commitment but do show the limitations of CEC’s power to deliver the outcomes completely.

- Regarding Electric Vehicles and Infrastructure, this is in line with changes in the automotive industry, central government targets and the growing support in the country for reduction in carbon from motor vehicles. Sandbach Town Council echoes the need for infrastructure support to facilitate use of electric vehicles and there is support for investment by the Town in charging points as take up for electric vehicles increases.

- With respect to Goal 6, CEC will find that this goal is not compatible with the
other goals, conserving heritage - buildings need to be energy efficient many of our old heritage buildings are not, insulation either internal or external will change the character of the buildings if they are to remain in use. Residents may need to compromise on the beauty of our landscape if green energy from wind turbines or small hydro schemes are implemented as part of the strategy.

- Action 10 is already in doubt, senior CEC staff briefed the Town and Parish Council conference that the SADPD will not be adopted in 2020, it will be delayed into 2021 after a likely reformatting and re-consultation - Spring 2021 at the earliest.

In summary the strategy is comprehensive and well structured but may be too ambitious relating to the stated outcomes.

**Weston & Basford Parish Council**

In May of 2019 the Government declared an environment and climate emergency and across the world there have been climate protests by people urging their respective Governments to act.

The Government published a 25-year Environmental Plan in 2018 which sets out how it proposes to improve the environment by creating and improving

- wildlife habitats;
- air quality;
- water quality, and
- tackling plastic waste.

The revised NPPF 2018 included some notable changes that reflected the need to act with emphasis on flood risk assessment and air quality in respect of climate change resilience and impacts upon health. Furthermore, the ongoing protection of the environment is important and is in line with Defra’s 25-year plan which includes more protection for habitats and that places greater importance on air quality when deciding development proposals. As a consequence, it is important that Local Authorities take a proactive approach to the mitigation of and adaption to climate
change in all of their policies and strategies including such critical issues as flooding, coastal change, water supply, biodiversity, sustainable transport, preservation and conservation of landscapes and overheating from higher global temperatures.

It is against this background that the Cheshire East Environment Strategy should be setting out the Council's approach to climate change and how it can be mitigated at a local level and, whilst it sets out 6 goals, these are all very high level and do not address any of the climate change issues or change the emphasis of any of the existing outdated Council Strategies including the Local Plan and the emerging SADPD. Compared to these and other Council publications this Strategy is only 12 pages long, no attempt has been made to incorporate the aims of the Government or the objectives of the revised NPPF whereas climate change should be driving all of the Council’s Strategic policies and changing the direction of the Council’s policies into the future.

What the Council should be publishing is an over arcing Environmental Strategy that covers all of the Council’s functions and clearly sets out how they propose to tackle climate change and meet the Governments climate change objectives. In particular we would suggest that any Environment Strategy should include the following;

• support the principal of environmental net gain for housing, employment and infrastructure development as set out in the Governments Environmental Plan;

• protection and enhancement of the natural environment including good quality agricultural land, wildlife, biodiversity, trees, hedgerows, woodlands and watercourses, Green Belt, Strategic and local green gaps as well as maintaining the rural character of much of the area of the Borough

In addition, developers should be encouraged to provide;

• dwellings that are designed to make the best use of natural light and ventilation as well as taking account of solar panels, grey water systems, electric car charging points and sustainable heating systems;

• At an early stage in any large development deliver local facilities such as
shops, schools, medical facilities and open space reducing the need to travel;

- Green areas for recreation and wildlife
- Walking and cycling routes to connect with other adjacent settlements and to create links into the surrounding countryside, and;
- Access to public transport

Cheshire East should themselves set an example by;

- Encourage new development in areas where good sustainable public transport already exists;
- Encourage landowners to improve the countryside by planting more trees, restoring and planting more hedgerows, leaving wide field margins for wildlife and reduce the use of pesticides
- Create better public transport and cycling links to the towns of Crewe and Macclesfield, and invest in the towns to make them places that local people want to visit.

In conclusion we would suggest that this Environment Strategy is withdrawn and re-drafted taking into account the Government Strategy, the guidance in the NPPF and the National Design Strategy but also that the principals of tackling climate change be included in both a modified Local Plan and the emerging SADPD.
Responses from individuals

Alec & Val Scaresbrook (members of the public)

1 Carbon neutral by 2025

The target to reduce the Cheshire East (CE) Council's carbon footprint to net zero by 2025 is an excellent start, but nowhere near enough to have an impact (didn’t the council leader say CE is only responsible for 1% of carbon dioxide output of the borough?), although it is vital that the council leads by example, so this is not to denigrate such a within-council aim.

Therefore the target should be more ambitious, i.e. to reduce the whole Cheshire East area’s carbon footprint, not just the CE council itself.

The statement ‘Everything we do as a council should consider the implications on climate change and the natural environment.’ is to be applauded, but does not go far enough. The current wording just states that implications will be considered, but does not indicate the consequences of these considerations. It should consider cradle-to-grave implications of products, services and actions, whether something is essential to be done regardless of implications, and should draw on proven evidence, not anecdote or gut-feeling, to discover implications. More importantly, it needs a policy to make clear what level of implication is considered acceptable/unacceptable. Also it needs to seriously consider how much it intends to balance economic factors (e.g. creating jobs) with carbon reduction. If it is serious then carbon reduction must win. Don’t be like Cumbria that has just opened a coal mine to create 300 new jobs. Surely it is unacceptable to exploit coal in this day and age. Will those 300 new employees be so happy when they and their families are affected by rising sea levels, more extreme weather and all the other consequences of climate change.

CE has the opportunity to go above and beyond any government commitments,
becoming an innovative and authoritative leader in the field, in the same way that the state of California has been a force for change. It forged a lead in the USA, drawing up stringent local legislation to clean up its air, and later its water and land, and applying many ‘green’ solutions instead of waiting for action at federal level. Apart from creating a better environment locally, the result was to force manufacturers to make changes in order to make sales in that state. This in turn gave those companies a competitive advantage in other states and abroad once these places belatedly brought in their own legislation. For example, Californian anti-smog laws resulted in the design of more efficient, less polluting, quieter small engines for gardening equipment – a significant improvement when the number of petrol-engined mowers, hedgetrimmers, leaf blowers, chainsaws and other equipment is taken into account world-wide.

CE also has the opportunity to change behaviours. Although there are fairly painless changes that organisations and individuals can make, such as switching to renewable energy suppliers, switching from fossil-fuelled engines to electric motors, reducing single use plastic and increasing recycling, unfortunately it is the behavioural changes of everyone that are essential to make a significant impact on climate change reduction. These are harder changes, unpopular, unlikely vote-winners, as can be seen by the French rioting over increased diesel prices. They are rioting for the right to continue to have poor air quality and damaged health, which appears ridiculous, but immediate concerns of money in pockets seem to trump wider or long-term considerations (as we’ve seen in Cumbria with their coal mine). Again, in the UK, we may have to wait for government to initiate major changes, but meanwhile CE has to explore its powers regarding its authority to create bye-laws and produce carrot and stick measures to force behaviour change. With so many of these changes, people will not consider them unless everyone else has to do the same, so relying on people to voluntarily make changes at an individual level is unlikely to achieve much. However, nudge theory can been used to good effect, so this powerful method of persuasion should also be explored.

Many carbon reduction measures are compatible with good business sense, so mapping advice and bye-laws to tangible cost savings is a route to business owners’ ears when appealing for carbon reduction. All waste from a business represents
costs/expenses that are being thrown away and it is better to tailor purchases and manufacturing methods to reduce waste, and recycle within the business, rather than disposal, even if some things can be sold on to recyclers. Additionally the council needs to explore its powers to vary business rates or other financial aspects in order to reward those businesses that achieve real carbon reductions.

Trialling alternative fuel for fleet vehicles should be carried out in conjunction with a review of journeys in particular regarding necessity, frequency, and routes, with a view to reducing mileage. This might mean having more localised hubs for transport and services. Any findings would be worth sharing with all businesses and organisations in the CE area as a model for them to review their own transport.

Communication, as ever, is key, including explaining to the public in general (and sectors such as schools, retailers, manufacturers and service providers) in simple terms and visuals, of the how and why and when of action points.

CE also needs to make sure it has sufficient representation, possibly in conjunction with other authorities, to pressurise the government to urgently bring in country-wide measures to complement local efforts, and provides local authorities the powers and funding necessary to implement effective carbon reduction measures and behaviours.

2. Reduce waste and pollution

The strategy to reduce waste and pollution is another excellent start but despite the introduction stating that waste strategy needs emphasis on reduction, this section does major on recycling and waste management. The fact that recycling is successful is no bad thing, but there is much work to be done to reduce the amount of waste being generated.

The problem is that individuals (myself included) tend to justify consumption of something by the fact that ‘it can be recycled’, therefore cancelling out any guilt. Plastic bottle?  Nah, that’s OK, just chuck it in the silver bin.

How to reduce waste generation at local level?  A town in Australia declared itself bottled water free. That was driven I think by the desire to curtail a water bottling
plant in the town removing water supplies, but also to reduce the amount of single use plastic bottles that are unsustainable and often form litter.

A local money-back scheme on glass/plastic bottles and drinks cans might be viable – but this is probably something that has to be implemented country-wide since if all items are marked up with a returnable deposit, the risk is that people who are able to will just shop outside CE. Or shoppers may bear the extra cost but not bother with returning for the deposit. However, any litter will be picked up quickly by those needing some extra cash. Money-back schemes in other countries mean they do not have a bottle litter problem. If CE does not have the powers to implement this, then it needs to pressurise government to bring this in asap.

The power of the media is enormous, with the recent David Attenborough documentaries doing more for plastic reduction than any legislative measure. CE should be flexible enough to capitalise on such popular sentiments – via local publicity and initiatives.

The scale of littering continues to be disappointing, particularly when one sees litter placed beneath or close to a litter bin (I don’t mean stuff that’s blown out or been taken out by birds etc). It is the hard core of litterers that needs addressing, rather than more litter bins, with education, encouragement and possibly more enforcement. Relating costs of dealing with litter etc in terms of council tax payments might make it less socially acceptable in the same way that drink-driving is disapproved of.

Fly tipping continues to be a problem, although usually swiftly dealt with IF reported. The problem is with reporting – some areas fall between two stools – is it the town council or CE? This often means nothing is done as it’s been reported to the wrong authority and one doesn’t pass it on to the other. Also ease of reporting needs reviewing. One-stop reporting whatever the location would help. How to reduce fly tipping? Education, and a review of costs of using the local tip. Although local authorities are only obliged to deal with household waste the fact remains that many have larger items to dispose of that they are not prepared to pay for. So more education on who will collect for free, how to advertise (e.g. free ads in local papers, free online selling sites (Gumtree, Shpock) and recycler sites such as
Freegle/Freecycle) – all keeping waste out of landfill. Also, it’s important to correct misconceptions of the cost of disposing of difficult waste such as asbestos-cement. This is not in fact as difficult or vastly expensive as some people think, but it often means that they will fly tip, or hide it in ordinary waste rather than deal with it properly, not considering the risks that they expose others to.

The food waste recycling initiative really needs to be equal to measures of encouraging home composting of mowing and veg peelings. Perhaps a drawing of a simple-to-make home-made compost cube would help? Reducing the volume of waste from the garden bins means the waste vehicles carry less weight/waste, so use less fuel, and possibly can cover more households before needing to travel to the waste hub.

Segregated litter bins are a good strategy, if only the public puts the right items in, but the whole issue is so confusing for people.

All street bins need to have lids to stop litter blowing out of them, or birds/vermin rummaging and spreading rubbish about. Their position also needs more consideration. There are open bins in Congleton that are on the ground, so accessible to rats, and those so high up on poles that a child or someone in a wheelchair cannot reach them. Also if bins were larger, emptying could be less frequent, possibly meaning fewer journeys generating carbon dioxide, if the vehicle had sufficient capacity.

**Waste energy**

CE needs to develop local strategies, getting all on board by selling the advantages. It could declare a ‘shut the door’ campaign to fight the recent fad of fixing shop doors open in winter, just to show they are open for business, while wasting heat. Similarly, but not so prevalent, in summer with the air con running. Both wasting energy. Surely businesses can all revert to an ‘open’ sign on the door? Another campaign could be ‘shut the fridge door’ aimed at food shops that have their refrigerated and frozen food in open cabinets, thus having the heating fighting the refrigerant. We don’t leave our fridge and freezer door wide open at home, so why do shops?
3. Improve air quality

The same comment as for waste/pollution, the key strategy is to reduce the pollution at source, rather than trying to clean up after the damage is done.

Although a major factor in air pollution at local level is our dependence on fossil-fuelled engines for transport, there are other uses of engines/power that have not been addressed in this section. Small engine use, generators, equipment used on business premises.

As CE is a rural borough, it rests on its laurels of an average good air quality. However this masks many hotspots, not just the ones currently measured. There needs to be much more measurement at junctions, waiting areas (such as bus stations), outside schools and hospitals etc.

CE also needs to update itself on the issue of traffic flow. There is a misconception that slow and stop/start traffic is more polluting re NOx etc than faster moving vehicles. The actual problem is that in certain areas, emissions can be trapped thus accumulating to dangerous levels. In more open areas, pollutants disperse more quickly – they still exist but are less dense.

One quick win is for CE to implement its own ban (if allowed to) on engine idling for vehicles. This needs to be enforced to be any use, but the focus on enforcement could be narrowed to bus stations, taxi ranks, outside school gates, leisure centres, and any premises where a waiting area is frequently used. The amount of carbon dioxide, never mind other emissions, generated by idling is unacceptable, and has an impact on pedestrians, residents and workers in these idling hotspots.

4. Sustainable transport

The strategy to move towards more sustainable transport is admirable but does not go far enough. Where are the targets? Without targets for x more sustainable journeys by y date, it’s meaningless.

Although sustainable transport is a good thing for pollution reduction, increased health, increased personal activity and reduction in obesity, transport is still a
fragmented sector within CE as with many local authorities.

There is the issue that Highways and Transport=roads. Then as a subsection, or even a separate dept, there is cycling/walking. Then another section – rail. Then another – bus. CE has to have joined-up thinking so when transport issues are considered, ALL active travel (walk/cycle/public transport) and mixed modes of travel are given equal priority and considered at the same time. Currently we have a road scheme, then it is looked at again to tack on a few nods to other modes of travel, with interested groups having to lobby for their needs. This is not acceptable. We need proper integration, which many other countries manage as it is common sense. Step off a train onto a bus because the bus station is next door. Obvious, so what happened in Macclesfield? Move the bus station up a steep hill and build something that is deeply unpleasant and uninviting to use (perishing in winter, on a slope so difficult to sit comfortably, with no bus info office or functioning toilet, closed altogether on Sundays). As for Crewe, well, who wants to wait in this derelict place? A great advert for the town – not.

The infrastructure should aim to ease the movement of buses and commercial vehicles (deliveries, tradespeople, taxis) so the hard decision is how to reduce the amount of other vehicles (private cars) to alleviate congestion so travel times are predictable, enable buses to be punctual and therefore a viable travel option, reduce road wear and tear, reduce particulate pollution from tyres and brakes, reduce noise pollution (from tyre noise and slipstream), and reduce the need for yet more land for parking spaces in residential, business and public spaces.

Sadly the lure of electric vehicles is in danger of distracting from major changes needed to reduce pollutants. There’s the danger that we’ll merely switch fuels without changing behaviours, thus continuing the car dependency that is so damaging. My fear is that this is like recycling. The mantra is Reduce, Re-use, Recycle, but only the easiest option requiring the least change in behaviour is cherry picked. Better than nothing, of course, but as mentioned above, recycling assuages guilt and/or makes people think they are doing all they need, requiring no change other than to use a different bin. Reduce and Re-use seem to have been ignored.

So with electric cars? Just swap fuels, pat oneself on the back, assuage guilt, and
carry on as usual. Whereas a lot more needs doing. You can't make a fruit cake with just sultanas, and you can't affect climate change with just one ingredient either. Switching fuel but not behaviour can distract from considering alternatives like walking, cycling, bus and train. Walk to the railway station? Walk to the local shop for the Chronicle? Nah, got an electric car, so it's OK to drive. Of course there is a place for electric taxis, buses, mobility aids, local deliveries, trades vans, but for individual transport for able-bodied? Perhaps not so much in the future. Unfortunately government is frightened of doing anything meaningful because denying people their apparent inalienable human right to drive about the place will be unpopular. Meanwhile, the continuing level of traffic (whether electric or fossil fuel powered) will continue to deter people from taking up cycling. And so the vicious circle continues.

Of course, a few people manage to balance their transport, only using their car as a fall-back when the bus/train service has stopped for the day, or walking or cycling is too far. However, once people have stumped up for a car plus paid all the annual overheads, most aren't so keen on paying out on top for trains or buses, or making the small effort of walking or cycling.

The enthusiasm for electric cars also assumes that it’s possible to replace the nation’s fossil fuel fleet of private cars – unlikely with the limitations of world resources for batteries. Is this why there’s a long waiting list for some models? So hopefully the fact that the government is planning to ban the sale of fossil fuelled cars from 2040 (woefully far into the future), might mean that industry will have solved the issue of sourcing materials.

The only advantage of electric cars is the quick win for reducing localised air pollution in urban areas. But the country will need more electricity generation – is there capacity and will it be zero carbon? When will we have suitable storage of renewably generated energy?

Of course, hybrids re-charge their batteries from fossil fuel, so reduce but don’t eliminate petrol/diesel emission issues, but 100% electrically-driven cars need their batteries recharging at a public charging point (which you plan to expand presumably for cars), or from home (needing a special charging point). Those in terraced houses
will need to trail cables across the pavement adding yet another obstacle to pedestrians and disabled.

So yes, encourage electric vehicle use, but prioritise ebikes and e-cargo bikes for transporting children and goods. Have targets for ebike charging stations – a lot of them.

We need to see an integrated transport plan for the whole of CE, and planners need to get out of their cars and try using buses and trains for a few weeks too, to discover the problems of users.

CE should prioritise pedestrians, mobility impaired, cyclists over private motorised vehicles. It should increase the number of pedestrianised areas (that also create more pleasant shopping experiences and relaxing cafe stops), add many more pedestrian crossing points, introduce congestion zones (as modelled by London), make one-way streets two-way for cyclists, create cycle lanes with solid white lines so parking is illegal on them, increase public transport (expanding on routes, providing a choice of express inter-town travel and stopping buses, expanding times so that workers are catered for, not just shoppers), fund better public transport perhaps by higher car parking costs and higher penalties for transgressions, ensure bus, train, cycle/walking routes connect (e.g. connecting commuters with their nearest station, including across local authority boundaries (e.g. Biddulph residents drive to their nearest rail station, Congleton; Congleton residents on the west side of town drive to their nearest rail station at Holmes Chapel).

The whole public transport issue needs reviewing so people can use bus tickets on any operator’s bus (smart cards), and CE steps up its representation on railway boards and committees to fight for all our towns with stations to have better services (particularly Congleton which is badly served).

5. Sustainable development

The strategy to move towards more sustainable development is necessary but needs expanding.

CE needs to do all in its power to upgrade local building requirements to meet much
higher standards regarding carbon reduction for households living in new builds. The developments should also integrate cycle and walking options that link in with existing routes, or pay in S106 agreements to improve these routes beyond their development.

The current thinking is to reduce parking opportunities (drives etc) to make car ownership more problematic and to encourage more walking/cycling.

Additionally when new developments are approved, CE should immediately contract with local bus companies to provide services on these developments.

S106 arrangements should be enforced in a timely manner – often inspections are not made at the right stage of development so opportunities are lost. Some radical measures are in order with financial penalties if CE has this power – even threatened demolition if agreements are not adhered to. It only needs doing once to show that CE has teeth!

Infrastructure to support ‘growth’ = new roads to enable new housing = more traffic so we’re back to square one. These are not carbon-neutral strategies! Particularly if there is little local employment for the new residents, who will then travel to work, probably by car.

CE should consider the necessity to respond to increased traffic by building roads. There is no obligation to respond. Let the traffic develop, become grid-locked, so drivers work it out for themselves and start car-sharing, or find a job nearer their home, or a job from home, or move house, or put their children on the school bus, or go to work on the train, or get their bike/ebike out. There is no need to pander to any clamour to reduce congestion, since the people in the traffic are responsible for the traffic. Why give priority to private vehicle owners over those travelling sustainably?

Why does the council (like many others) wring its hands over ever increasing traffic, and then attempt to deal with it by road improvement schemes, road widening and new roads? It isn't actually possible to continue to cater for ever increasing traffic as we'll run out of land, and meanwhile it just moves bottlenecks elsewhere, and if parking is required at the journey's end, it means provision of public car parks, or driveways for new homes, or tolerance of roadside parking, which normally means
obstructive pavement parking. The government does not seem to want to bite the bullet over this, but the only answer is to reduce traffic, not keep enabling even more. Unfortunately buses, taxis, commercial vehicles and tradespeople become caught up in this traffic, which is the bigger problem, in my opinion. So when the council identifies a traffic problem, its flow diagram of dealing with it should start with analysing journey lengths and purposes, and then work on how to reduce the number of vehicles on the road at that time. This means time, effort and money needs to be spent on carrot and stick approaches to getting able-bodied people on local journeys out of their cars and onto their feet, a bus, a train, a bicycle, or a combination of these. Currently the priority is wrong, with panic over traffic, measures that ensure private car transport is catered for first, even if the intention is to get buses and freight moving, and then non-motorised users very far down the pecking list, often as an afterthought. Non-motorised users are also zero/low carbon users so should be top priority!

Support growth by encouraging green sector industry and employers to the area.

6. Natural Environment

This section is pretty woolly. Where are the SMART targets?

Specifically connected with horticulture, can all planting and maintenance of open spaces, parks, gardens, recreational areas be reviewed for impact on carbon dioxide production/air quality plus impact on soil depletion, growing media and potential resultant habitat destruction, demands on water supplies (the latter not an issue currently but predicted to become a problem).

Including but not limited to:

Mowing frequency – it may be advantageous to mow edges of larger grassed areas, and desire lines across it, rather than mow the whole area, to reduce fossil fuel use, improve air quality, and increase usefulness for wildlife. An unintended consequence might be that machinery capable of cutting grass infrequently might need to be hired or purchased, and might use more fuel, thus cancelling out the carbon advantage, although still useful for wildlife. The public would need to know why the grass has been ‘abandoned’ too.
Planting choice – evergreen trees and shrubs are good for filtering out dust and other pollution from roads, protecting roadside residences and schools. Shrubs may not be a good idea where people feel vulnerable though, as they make good hiding places. An increase in tree planting either singly or more in larger areas is worth considering, providing there are no problems of reduced visibility for road users, or increasing hazards in autumn with leaf fall.

Formal and informal planting areas – permanent perennial plants have a lower carbon footprint in terms of their growing and transporting and then planting since only done once, rather than seasonal bedding plants with twice-yearly removal/replanting. Not all perennial plants last forever, but their replacement in cycles would still be less frequent than annual bedding. This also saves soil erosion, dust, maintenance costs in terms of hoeing/weeding/watering. Many seasonal bedding plants are grown in glasshouses with artificial lighting/heating which also has a carbon impact.

Maintenance machinery – fossil-fuel powered equipment has become the norm, replacing hand tools. Mowing would be difficult without powered machinery, as would cutting large lengths of hedge, but equipment could be kept well maintained for it to run efficiently and minimise pollution, or replaced with the best possible for reduced emissions. Indiscriminate cutting back of individual shrubs etc with powered hedgetrimmers could be replaced with more considered pruning with hand-operated secateurs and loppers at the correct time of year for the plant, but only when needed, so not actually more time-consuming. Powered leaf blowers have also become the norm for blowing mowings off pavements, leaves off beds and borders, and hedgetrimmings/prunings into heaps. It’s possible to use a lawn/leaf rake to clear gravel and paths, to consider allowing leaves to remain to rot down in place unless likely to provide a slip hazard once wet and slimy, and generally to clear up with a sweeping brush, plus boards to move material to a container. Mulching mowers re-cut the mowings before dropping them onto the grass, so there is no need to box off the mowings and keep emptying the box, or to deal with mowings that blow onto pavements. However mulching mowers can clog on wet/long grass so need time to clear, and not always the solution in the UK although fine for drier climates/grass. UK-produced mulchers are usually better at UK conditions. If time is
no longer needed for ripping out bedding plants twice a year, then more time is available for the old-fashioned, slower methods that are healthier for the operatives and the public (no noise pollution, engine fumes, so better air quality). Serious consideration needs to be given to the health of workers close to busy roads too (e.g. Congleton roundabouts are mown and manicured by people working in a whirlpool of PM10s from tyre, brake and engine emissions, never mind the noise which is a proven stressor).

Appropriate planting: if we work with the existing soil and conditions of sun/shade, wet/dry areas etc, to choose the plants likely to succeed, then less maintenance is needed, the carbon footprint reduced, plants have more chance of cleaning the air, and all benefit, the planet included.

Inspire the workforce and the public – use public spaces to demo planting for problem areas e.g. a drought garden, and to encourage people to grow food for themselves. Good for mental and physical wellbeing. Look at the Incredible Edible website for their achievements in engaging the public. The more the public understand the link between the health of the environment and their own health, and the impact of actions on carbon production and air quality, the better.

Councillor Akers-Smith (Cycling & Walking Champion for CEC)

The word 'promote' and 'encourage' is used throughout the document, unfortunately promotion and encouragement is simply not enough to enable people to use their car less and use sustainable transport modes more. This is because these words do not address the reasons why people don't use sustainable transport. Detailed below are the reasons why we need to not just promote the use of sustainable transport to increase the uptake of walking, cycling and using the car less, we need tangible targets, increased investment and infrastructure that will actually enable people to make a real choice to use sustainable transport.
Cycling and Walking

Cycling and Walking are the biggest single influences to reduce the use of the car for short journeys. One mile takes 20 minutes to walk and about 7 minutes to cycle. Leaving the car at home with more people walking and cycling will impact considerably on air quality by reducing carbon emissions. The biggest barriers to the uptake of cycling and walking for journeys of under 1 mile are:

The roads are too dangerous with vehicles travelling too fast, no consideration from drivers. - Due to the death or serious injury of one person a week Cheshire East roads are classed as the most dangerous in the country. Slowing traffic down in and around town centres will create a safer environment for pedestrians and cyclists. The use of 20mph zones in town and village centres, raised tables at junctions, implementation of infrastructure design from the Department for Transport LTN02/08 and up dates will enable people to feel safer and try cycling. When people feel safe to cycle for short journeys they will increase their usage for longer journeys because it will reduce their outgoings and make them fitter, increasing their resilience to illness.

Not enough zebra and toucan crossing across busy roads - the current guidance of pedestrian footfall and vehicle traffic flow to decide on road crossings is flawed. We are told there isn’t enough pedestrian traffic to justify a road crossing, but if there was a road crossing making people feel safe, there would be more pedestrian traffic. Increasing the number of road crossings significantly will increase safety for people walking and cycling.

Dangerous crossing at roundabouts and road junctions - the width of many of our road junctions enable fast moving traffic, reducing the size width of the entrance and access to a roundabout and raising tables at junctions with the right of way for pedestrians and cyclists (if a shared road) will create priority for vulnerable road users.

Not enough covered cycle parking - to allow people to keep their bike and themselves dry if it is raining, and to allow people to park their bike throughout the towns. People will take their bike with them if shopping so there needs to be
considerably more bike parking, storage and covered facilities.

Walking - there are not enough dropped kerbs that facilitate walking, mobility scooters and wheelchair users, surfaces can be uneven and a person having to travel 30m to a dropped kerb makes life more difficult than it needs to be. If we want people to be active we need to make our pavements accessible.

To have a pavement/footway/cycleway maintenance programme that is reviewed annually to ensure the footways/cycle ways are fit for purpose and support the ambition of increasing the uptake of cycling and walking.

Creating an Active Travel network that shows the traffic free routes into and out of the town centre, active travel network linking schools to houses, a target of km of traffic free cycle routes implemented or planned for each month/year, and measures for more infrastructure would go a long way to enabling people to cycle and walk more.

**Trains**

The last mile - Many railway stations maybe a short distance into the town centre. For many towns there is no or little connectivity to get from the railway station into the town/village centre. E-bikes and E-scooters would enable people to travel from the railway station and return back in a timely fashion.

Train fares can be expensive to use - A family of five to travel to Manchester is at least £60 and can be higher, it costs £20 in a car including parking. There is little incentive to use the train because it works out at a much higher cost than travelling by car. We need to work with the railway companies and central government to reduce the cost to encourage people to use the trains.

Limited spaces for bikes - It is not always possible to take bikes on board a train because of limited spaces. There needs to be unlimited spaces for bikes to enable their use as part of train travel.

Covered and secure bike parking - Put simply there is not enough secure, safe, covered cycle parking at railway stations.
**Buses**

Not enough covered bus stops - bus stops without a shelter create an uncomfortable environment for people waiting for a bus, especially when it is raining. Vehicles will drive fast through puddles and splash you. The bus stop post can often be on a grass verge which is muddy when wet. Improving bus stops will improve the environment for people who would like to use a bus.

Not enough buses - and bus services that don't coincide meaning that passengers have to wait an hour for a bus.

No direct service -buses that go the long way around make journeys take much longer than necessary'

No sharing of tickets - being able to use bus tickets on different services would offer real choice for the consumer.

Expensive - Some short journeys can be expensive, as much as £6 for a return trip into and out of the town centre.

Bikes - Not being able to take bikes on board can be a barrier for people to use the bus because when they get to their destination, their bike would enable them to carry on their sustainable journey.

The Cheshire East Health and Wellbeing Strategy 'as attractive and accessible green spaces will support and enable people to access outdoor space for the mental and physical health benefits - Enabling people to cycle to the outdoor space rather than taking their car to it will provide double the benefit. Families will cycle and the short journeys that people take can be reduced with a network of traffic free cycling infrastructure.

**Electric Vehicles**

Whilst it is admirable that Cheshire East Council have included goals for the increase of infrastructure for electric vehicle charging. What electric vehicles do not do is get people fit and active and do not relieve congestion. We have 39,000,000 vehicles in this country which if they were all electric would still cause congestion, plus there are
other emissions from tyres and wear and tear. Not to mention the damage to the environment from the precious metals in the batteries. They will help, but they are not the solution, and by relying on the idea that the use of electric vehicles will significantly reduce congestion, stops us creating a solution by increasing the uptake of walking and cycling, both of which are carbon neutral forms of transport.

I would like to see added to the PRIORITY ACTIONS in this document:

Yearly targets for traffic free cycling infrastructure

Yearly targets for dropped kerbs to facilitate wheelchairs and mobility scooters

Yearly targets for pedestrian and toucan crossings

Covered cycle parking provision

Secure cycle storage - particularly at railway stations

Affordable and an increase of the availability of public transport

Identify appropriate locations across the borough for covered cycle parking provision such as all Cheshire East car parks.

As the Local Planning Authority the Council should request that town housing developments have bike parking/secure storage installed. Retail developments have secure/covered bike parking installed.

Most importantly that developers provide details of how they are going to incorporate traffic free cycling infrastructure in and around the housing development and to work with the highways department to look at how the developments will effectively connect creating a safe environment for young people to cycle. To provide funding to help create the joined up infrastructure needed, to obtain funding through central government.

To work with the cycling groups for each town to create a network of traffic free cycle routes into and out of the town centre, via schools and retail developments. Potentially a cycling and walking circumnavigation around each town that will enable the uptake of active travel.
The Air Quality Management Areas remain so and have been the same for many years, producing a report that details them is what we do. Reducing peoples reliance on the car for short journeys and increasing the number of people walking and cycling more will improve the AQMA's.

**Colin Dore (member of the public)**

Overall these are important aims. I think the introduction of food waste recycling is an very important step. I would like clarity on what will be done with the resulting waste.

I am presuming there will be a more detailed plan once the consultation is complete, please confirm.

Additional things I would like to see included:

Food - I would like to see more space made available for people to grow their own. There are a number of sites in Macclesfield but I live in Bollington where demand outstrips supply.

Council should support initiatives such as zero waste initiatives by making meeting places/drop off points available in council buildings

Council should encourage community level renewable energy projects such as wind turbines.

**Michał Piątek (member of the public)**

I would like to submit my response to the Draft Environmental Strategy 2019-2024. Also, I would like to take this opportunity to thank all members of the Council for taking these first, but gravely important steps towards fixing the climate crisis. It would be difficult for me to point out any other issues of greater importance than this ecological catastrophe of unprecedented scale. Tackling it will be a challenge greater than any other in the known history of the human kind. We have run out of time for “experimentation” and now is the time to use all our resources and known solutions to put this crisis to an end as soon as possible. It is why my response might sound
over critical at times. We have to be critical over the solutions we decide to use and we have to be critical at every single step we take from now on. Data from the IPCC reports shows us how unforgivable our current time frame is and how little time we have got left to avoid the collapse of human civilisation.

This crisis will affect every single one of us which makes it even more important to be inclusive, to make just decisions, to look further into the future and try to predict the consequences of these decisions. This is why my hope is that the Commission will seriously consider my suggestions and suggestions of others.

**Measuring progress**

The IPCC reports tell us that we have very little time to respond to the climate crisis, and even the slightest setback in reducing our carbon dioxide emissions can lead to catastrophic results. This is why providing citizens with only annual reports are not good enough. This will leave people with only four chances to respond. Should the Council fail to meet its goals, there will be only four reports between now and 2024, and only four opportunities for its citizens to undertake necessary actions. I would encourage the Council to produce reports every six months at least, or more frequently.

**Transport and travel**

It is admirable that the Council is seeking to improve access to public transport, as the Council's own data shows that over 40% of households have two or more cars. Unfortunately, even if the goals defined in "Increase sustainable Transport and Travel" section of the Environmental Strategy were to be achieved car ownership would remain almost the same.

The source of the problem lies in what you define as a mission of public transportation. You say that success would be when people have access to places of recreation, leisure, and the countryside.

While this sounds attractive, providing access to such places would only help stop car use in only a fraction of cases. Let me elaborate by taking a step back. What's the purpose of introducing public transportation? It's purpose is to reduce CO2
emissions by providing people with an alternative to car travel, to allow people to commute to where they want, when they want, even if their budget is low or their health is impaired. Public transport should also aim higher, it should aim to eliminate inequity by providing everyone with equal access to workplaces, education facilities, recreation, shops, and health facilities at a fair price. This is where the Draft Environmental Strategy fails.

By providing people with a means of transportation to places of recreation, leisure, and the countryside you are only covering a marginal fraction of general transportation needs. Even if every person would have easy access to these places there would still be need for car ownership! This will not help to reduce CO2 emissions the way you imagined it would. The main reason why people have to own at least one car is not because they cannot visit Tatton Park or Peak District once every few months. The reason why people do have to own at least one car because they cannot commute to shops, their workplaces, hospitals and general practices, their children cannot commute to schools, sometimes their mobility is impaired, public transportation is unreliable, trains are often cancelled, buses are running late, or in the most absurd scenarios- when train tickets are almost as expensive as owning a car and paying for fuel.

This is why I believe the aim should be to provide people with a way to commute to most commonly visited places such as:

• schools
• hospitals
• offices / workplaces
• shops

This should be at the heart of this Strategy but currently it's only a side note. It is something you briefly mention but you did not go far enough to include these as the key goals. I believe you could go even further than that, by defining public transport pillars such as:

• affordable (daily commute should always be cheaper when using public
transport)

• reliable (cancelled or massively delayed buses and trains should be a rarity)

• everywhere (Council should aim to eliminate dead areas where no public transportation exists, i.e. Congleton <-> Wilmslow)

• scalable (it should be easy to get from the outskirts to the city centre, as well as travel between cities)

• interconnected (bus timetables should be synchronised with train timetables and vice versa)

• adaptive (a public transport option should be provided whenever a new shopping centre, school, hospital or suburb is built)

Similar goals can be defined for bicycle networks:

• bicycle lanes are commonly available and well maintained

• bicycle lanes are connecting most popular travel destinations within the city reach

• bicycle racks are common and where bicycle theft rates are high, racks are monitored by CCTV

• buses are equipped with bicycle compartment so it is convenient for cyclists to use public transport when needed

If you are seriously thinking about reducing CO2 emissions, then you should reconsider your approach to public transportation. Truth be told even if people continue to own cars just so that they can go on holiday once every few months, but switch to public transport for their daily commute, this would be a much greater success than if it was the other way around.

According to researchers most Britons do grocery shopping once or twice a week, which is far more frequent than they visit the countryside or leisure facilities. Providing a reliable public transportation method to shops would cut CO2 emissions more effectively than providing public transportation to much more rarely used green
Providing access to health facilities should be a priority with the climate crisis worsening every year. The aim to cut the amount of cars on the roads, and the British population ageing it will be even more important to have access to hospitals and general practices. Let's take Wilmslow and Handforth as an example. Currently there is only one bus service run by Arriva - bus 130. It is extremely unreliable as it runs from Manchester all the way down to Macclesfield which often results with over one hour of a delay. It is also the only way to get to the Macclesfield General District Hospital which is the default hospital for all the patients from the Wilmslow/Handforth area. Arriva just announced that this bus service is going to be discontinued with the end of this year leaving hundreds, if not thousands without easy access to Macclesfield Hospital. What these people are to do but to buy a car or pay for very expensive taxi service?

I believe I do not have to elaborate why is it also extremely important to provide people with a way of commuting to their places of work - a huge part of the population have to do this every single day and very often the only choice they have to make that journey is to own a car.

I would also welcome more precise definition of goals. It is unclear how "access" to public transportation will be measured. Is it going to be measured by calculating how many bus stations per 1000 residents are going to be built, by taking the average travel time to key facilities? Because it is so vague, any implementation of this high level strategy could be named as a "good implementation". In my belief the strategy should set high level constraints and precise goals in place. Then a more detailed document would elaborate on the actual implementation of these goals. Because these high level goals would be more precise, there would be no ambiguity left and no chances for the implementation to "miss the point". Imagine being asked to build a jet fighter, you read the specification and the requirements are that "it flies" and that "it is good". Surely, even a paper plane would fit into this definition.

To give you some more perspective on why I believe precise goals are important, let's consider a hypothetical person from Wilmslow who wants to visit Bakewell. Currently this journey would take around three hours and about three to five changes
if public transport was to be used. The same journey would take about 30 minutes by car. Our hypothetical person would still fall into the category of people who "have access" to public transportation which is something your Strategy mentions. You say that a success would be when people have access to the countryside but what do you mean by "access" is not defined.

Sensitive and Sustainable new development

Overall I agree with what is mentioned in this section, but I would like to see more defined precise goals to be set in place. It is hard to elaborate on whether this part of the Strategy is good enough or lacking when a lot of it is very ambiguous.

I would also like to see an addition to your definition of "sustainable" development. I strongly believe that it should be a requirement that any new development, be it a hospital, general practice, school, shop, office must be made accessible via public transport, bicycle lanes or and/or be within a convenient walking distance. This is because the alternative is what you describe as a problem in the "Transport and Travel" section - bloated car ownership.

Encouraging behaviour change

I fully support any action that aims to educate people on climate change. Cheshire Council and any other public authority should at least feel obliged to tell people the truth about the reality of this grim crisis.

At the same time, based on the information from this section of the Draft, my worry is that Cheshire East Council does not fully realise what events are waiting for us down the road, ten, twenty or thirty years from now. The IPCC reports tell us that even if we were to go fully carbon neutral today, we will still suffer from various catastrophic events. We need to prepare the people for these events as much as we can while we can.

This can be achieved if the Council decides to raise awareness of the climate crisis based on the information enclosed in the IPCC reports. This should be at the heart of all education and awareness actions. As devastating as the truth may be, the last thing we want to do is to fool people into thinking that by switching to a bicycle all
problems will be solved and no catastrophes are awaiting down the road.

Informing people about the factual state of the climate crisis is the key to building more self aware society, one that understands what does it mean to be a part of nature and one that understands how to live in symbiosis with it.

I would welcome a change to the Draft Strategy which would incorporate the IPCC reports data into all awareness actions.

I would also advise the Council to go even further than that. Anthropocentric climate change would probably have never happened if we had more educated policymakers, councillors and politicians. It was in the 70's when the issue was put out in front of the Congress of the United States, and it was then when politicians decided to ignore science, ignore facts.

As much as the Council wants to raise awareness amongst the regular people, it should also start raising awareness amongst policy makers. To make sure that science and facts are put at the heart of governing. Educating MPs, lawyers, anyone who has anything to do with policy making, yourself included, is the key to solving this catastrophe. Why not organise conventions for policymakers from all around the country with the aim to share and spark ideas, educate each other?

**Nick Billington (member of the public)**

**General comments**

It is extremely welcome that the Council has finally produced its first Environmental Strategy, which is desperately needed. The Strategy is clearly the product of careful thought and extensive work and there is much to commend in it, particularly the development of new initiatives like recycling food waste. However, the level of ambition remains modest in comparison to the scale of the climate emergency that we face, so the Strategy's objectives and actions could go much further.
**Alignment between Economic and Environmental Strategies**

The Council’s Environmental Strategy and its Economic Strategy rightly acknowledge each other and the need for each strategy to complement the other.

Page 2 of the Environmental Strategy notes that it “complements the Council’s Economic Strategy as an attractive and sustainable environment is inextricably linked to quality of place.”

Strategic Objective 3 (page 15) of the Economic Strategy (consultation draft – version 20.5) refers to the Environment Strategy by noting that “Alongside the Economic Strategy, it will help to define how Cheshire East will build on its strengths to deliver quality of place and support a healthy, prosperous and sustainable community.”

However, there appears to be no explanation of how each strategy’s objectives can be delivered without compromising the objectives of the other. Growth is, unsurprisingly, a key aspiration of the Economic Strategy, which notes for example (on pages 6-7) that “by 2024 there is an ambition to: Grow the Cheshire East Economy to at least £15 billion”. This growth could be achieved in part by producing goods that do not last long, which are not economical to repair, or which cannot be easily recycled, as such goods end up being replaced quickly – meaning a higher level of demand for new goods, a consequent increase in production levels and a higher growth rate for economic output. Such an approach is clearly counter to the objectives of the Environmental Strategy, but neither this document nor the Economic Strategy explain how such environmentally damaging forms of growth will be avoided. (Similarly, environmental sustainability should mean producing and consuming only those goods and services that are needed. However, advertising and promotion encourages consumers to buy goods and services, whether they need them or not – which results in more economic output and more growth, but a larger carbon footprint and more damage to the environment.)

In essence, there is an unstated conflict between the two strategies, as environmentally sustainable production and consumption effectively means less
production and less consumption of goods and paid-for energy than otherwise: for example, activities like walking instead of buying and driving a car, or drying washing on a line instead of buying a tumble dryer incur much less (or even zero) expenditure and so contribute less to economic output - and hence result in less growth. But as we face a climate emergency, environmental sustainability should take priority.

**Promotion of and support for the “repair” industry**

The Strategy rightly acknowledges that waste should “be re-used, recycled or recovered wherever possible, and only disposed of as the last option” (1st paragraph on page 4). However, the word “repair” does not appear once. The Strategy should address this oversight and could also:

• promote and champion the repair of manufactured goods, machines and vehicles, so that they last longer and production/consumption is more sustainable;

• highlight the benefits of producing standardised goods (whose replacement parts are more widely available, whose means of operation are more widely understood and which can therefore be more easily repaired);

• encourage the sharing of guidance and best practice on how and where to get products repaired, so they are not thrown away and replaced.

**Measures to encourage sustainable travel**

Besides the steps identified in the Strategy, there are some other obvious steps the Council could take to encourage residents, workers and visitors to travel by environmentally sustainable means. These include:

• the provision of more pedestrian crossings and pedestrian-friendly routes in and around town centres. (Neither the word “pedestrian” nor “crossing” appear in the Strategy.) There are noticeably few of these in Sandbach, for example:

  o crossing many of the main streets through the town’s retail centre depends on motorists stopping to let pedestrians walk by;

  o the B&M (formerly Homebase) superstore on the eastern edge of the town is
just a few minutes’ walk from the town centre and only 1 or 2 minutes’ walk from the car parks next to Waitrose, but hardly anyone walks between the two – probably because it means walking along/ across a busy A road with no crossing opposite B&M and then either walking around or down a steep grassy embankment.

• reducing the land area available for car parking and/ or introducing car parking charges. (I note page 3 proposes a possible parking levy, but only for staff at (its own?) workplaces). At present, apart from the office itself and a modest amount of bushes/ hedges/ other “green infrastructure”, the Westfields plot consists almost entirely of (free) car parking spaces, with additional free car parks adjacent to these. Moreover, one of these car parks is sometimes reserved for the Council’s elected Members on key meeting dates. These practices encourage car use and set a bad example to residents.

• efforts to reopen the Sandbach-Middlewich-Northwich railway line to passengers, so that Middlewich no longer lacks rail access. (It is ironic that the Strategy mentions Middlewich only in relation to the Eastern Bypass road scheme.) The adopted Cheshire East Local Transport Plan 2019-2024 identifies this as an ongoing challenge, so surely it is significant enough to merit inclusion in the Environmental Strategy?

**EV charging infrastructure and ease of use**

Improvements to the EV charging infrastructure – which the Strategy prioritises – are welcome. However, the Strategy seems to underestimate the difficulty of rolling out this infrastructure and encouraging people to switch from petrol/ diesel vehicles to EVs. It should not just aspire to an increased number of charging points, but to ensuring that these points are better designed, more reliable and easier to use.

The final paragraph on page 7 is an indication of how much the Strategy appears to underestimate the challenge. It says:

“The Council has already provided six 50kV rapid charging units in car parks in Congleton, Wilmslow and Nantwich (Love Lane). The sites have been chosen as they are close to destination points such as supermarkets and coffee shops, where drivers can pass 20 minutes or so while waiting for their vehicle to charge.”
I’ve had an EV for over 2 years and know others in the Cheshire East area who own one too. Our perspective may not necessarily be representative of EV users more generally, but a shared experience is technical problems with (among other things) the local charging infrastructure. I’ve tried on multiple times to use the Wilmslow and Nantwich charge points that the Strategy cites – following the charging network’s (Engenie’s) instructions – and the machine have failed to work, for reasons unknown. (I assume here that the Wilmslow machines referred to on page 7 are those in the Sainsburys car park.) In my experience, the Nantwich and Wilmslow machines are not used that frequently – or being used by a driver who has left their charging vehicle unsupervised – so there is no-one around to explain how they actually got the machine to work. Some other networks (e.g. Ecotricity) are similarly problematic, but others work fine for me (though not, it seems, for all EV users).

Even when the charging procedure goes smoothly, it can take significant time: connecting the cable, logging into a mobile app if the charging network requires access that way or making a one-off card payment in some cases (e.g. with Engenie). It isn’t worth going through process that if you’re only going to charging the vehicle for 20 minutes – particularly if you cannot afford a very new and/ or highly expensive EV that can charge at a rapid rate. If it’s freezing or raining heavily, a long-winded charging experience isn’t fun and you have to be careful to avoid rain water getting into your (or the operator’s) cable because there is generally no shelter over or around the charge point. If we want to persuade more people to switch from petrol or diesel to EVs, the charging process has to be made as easy as filling up with petrol. At the moment, it’s far more complicated and indeed unnecessarily complicated. The number of different networks, each with different charging procedures and payment structures, also adds to the complexity and time involved for EV users.

Some of the charge points, including those in Wilmslow and Nantwich, also appear poorly designed. The Wilmslow and Nantwich ones have tethered cables and the connectors at the end of these fit very loosely into slots within the machine. Consequently, the connectors are easily knocked accidentally out of their slots, meaning they fall on the ground and get damaged (and run the risk of water ingress if it rain gets in before they are picked). It seems quite possible that the reason these
machines do not work is due to the poor design and the damage that results from that.

Payment structures can also act as a deterrent: for example, a network that requires a substantial monthly subscription will only recruit subscribers who are likely to use that network’s machines many times a year.

**Reducing consumption of plastic**

It is welcome that the Council is “assisting communities though providing educational material such as our Life with Less Plastic campaign” (page 5). However, the Strategy should also include an explicit commitment to the Council reducing its own plastic use and encouraging its staff to do likewise (e.g. using pencils instead of pens, or buying milk in cardboard packets instead of plastic bottles).

The provision of free, drinkable water dispensers/ fountains is a common feature in some European countries and reduces the demand for single-use plastic water bottles. The Strategy should at least consider the viability of making such dispensers available in public places.

**Recycling**

Public bins for recyclable waste are commonly available in other parts of the UK and Europe, but there are few in Cheshire East: it seems they are generally present only at supermarkets and other large retail outlets, not on the street. Increased provision of such bins could increase recycling rates and this is something the Strategy should consider.

**Guidance on climate change mitigation and adaptation**

The Strategy should seek to provide residents and local businesses with advice and guidance on how to mitigate and adapt to climate change. Existing guidance produced by the Council and local partners – for example, the climate adaptation advice offered to businesses on the CLASP website (http://claspinfo.org/smeadapt) - should be promoted and efforts made to ensure such advice/ literature is kept up-to-date.
Peak District

The Peak District is one of the major environmental assets within Cheshire East, but is mentioned only briefly in the Strategy, with page 10 noting “We will also coordinate with designated landscapes and other managed green spaces, which in Cheshire East include part of the Peak District National Park.” Yet there is no reference to how the landscape and management of the Peak District could be improved environmentally. For example, the prioritisation of activities such as sheep grazing means an absence of trees and plants that could (a) better absorb rain water and reduce the impact of floods on lowland areas and (b) increase the biodiversity of the National Park (which has a limited range of wildlife at present). Greater tree coverage would also provide more shade and cooling for walkers (and animals) during hot weather. I appreciate that Cheshire East is just one of many partner organisations with a stake in the Peak District and only one of several local authorities that the National Park covers, but the Strategy could nevertheless champion more environmentally responsible management of its landscape and seek to persuade other Peak District partners of the merits of increased tree coverage.

Manchester Airport

The Strategy should explain what action the Council will take to limit the environmental impact of the Airport and its contribution to climate change. Ironically, the Economic Strategy (briefly) acknowledges this issue (see quote below from page 22), but the Environmental Strategy does not:

“Cheshire East Council will continue to look to maximise the access to the airport for our residents and businesses by road and rail and work with Manchester Airport and Greater Manchester to support growth for Cheshire East as the airport undertakes its investment programme. However, whilst this growth provides opportunities for businesses and visitors, this should be balanced with environmental considerations.”
Reverend John Whitehead (ADAPT member and Cheshire CPRE trustee)

1. This document is welcome, combining 'Green New Deal' interlocking principles with proposals for action by Council, partners and citizens in the next few months.

2. CE plans a carbon neutral Council by 2025, through, for example, trialling alternative fuel vehicles for application to the vehicle fleets.

COMMENT: an earlier deadline should be set. E.g. Dundee already has electric taxis.

3. Food Waste and Pollution

COMMENT: reduction of food waste needs a massive education campaign at all levels from schools to shops. Disposal of food waste needs an effective collection strategy, which citizens actually endorse and support.

4. Air Quality

The proposals are obvious and desirable – alternative and active travel, low emissions technology, and most importantly, public awareness and education.

5. Sustainable Transport and Travel

The Strategy states that it will have a Local Transport Plan in October 2019.

It advocates access to places of recreation, leisure and countryside, etc.

Rapid Electric Car Charging Points – 6 so far in Congleton, Wilmslow and Nantwich. COMMENT: these proposals need urgently to be accelerated.

6. Sensitive and Sustainable New Development

COMMENT: decentralising energy is proposed, but no facts on the challenging process of implementation.
The protection of trees, woodland and hedgerows needs to be mandatory on both public and private land.

In the Design Guide the stress on the importance of character and quality of place is welcome.

On the other hand bypass and relief schemes at great cost in the Local Plan, already in the making like the A500 widening by Wolstanton, promote vehicle use and pollution, and should be downgraded in favour of public transport and alternative travel.

7. Protecting and Enhancing the Natural Environment

COMMENT: where is the Green Infrastructure Plan of October 2019?

CE Open Spaces, Rights of Way, parks and pitches etc. do indeed need both protection and enhancement and also improvement, so vital for citizens well being.

8. Measuring Progress

A mandatory undertaking is needed that this will happen on say a six monthly basis.

9. Encouraging Behaviour Change through Communications Activity

This important proposal fails to recognise that people are inundated with communications and increasingly fail to respond.

What is needed is a requirement for existing fora where concerned local people meet – e.g. Parish Councils, activity groups – to discuss and spread the environmental message in imaginative activities.

In conclusion, the Summary Action Plan lists 12 Priority Actions.

9 of those are set to be achieved between September 2019 and April 2020.

If the Action Plan is serious, then progress in specific areas as above should be reported and publicised before the end of 2019.
Rita Ledgar (member of the public)

*Firstly, I have found that not many people I have spoken to are aware of this consultation.

* secondly, I do not find the questionnaire user friendly so have decided to take the email option

* on a positive note I feel there are lots of good intentions in this plan but really not going far enough.

I note in the introduction about education of the wider population but I am concerned that you concentrate a lot of effort on your own vehicles, staff and premises rather than representing the people of Cheshire East.

2 Carbon neutral by 2025

Again I would be interested to know why a lot of these changes seem to be enabling your staff to feel good that things are being done to lessen damage on the community, but not so much help for the population of Cheshire East, I would be glad if you were able to help more people become carbon neutral; I think it should be made clearer to the public that this target is for Cheshire East staff and vehicles etc not everyone in Cheshire East.

3 Waste and pollution

nothing to add sounds like a good plan

4 air quality

are results available to the public?

I walk to work and back some days and at certain times when walking alongside slow traffic the fumes seem really bad and I wonder if I should be avoiding certain areas at busy times of day?

I feel I need this information to make an informed choice.
5 increase sustainable transport and travel

This seems to be mainly pending the results of the local transport plan so how can we comment on this?

6 sensitive and sustainable new development

I gather there is a lot of national pressure to build and develop and am not sure how much choice we have in this. I hope we don't lose the character we have in this part of the U.K. through continual growth.

7 protect and enhance our natural environment

Cannot comment until the other plan is available

8 measuring progress

This seems too general, can more clarity be given on what will be measured and reported on specifically

9 encouraging behaviour change, communication etc

This seems to overlap with the introduction

I hope this can be done with real meaning and be truly effective and reach everyone.

Sarah Allwood (CEC Environmental Health Team)

I work within the Environmental Health team and have just been reading the consultation document, which I feel is a good starting point with actions that need undertaking. On this point, action 7, publish the 2019 Air Quality Annual Status Report. As this strategy is for 2019-2024, would this action be better if you left it as simply publish the Air Quality Annual Status Report? Just because we have already done the current action but we have to submit an annual report every year to Defra, i.e. there will be one in 2020, 2021, 2022, 2023 and 2024.
Anonymous responses

Anonymous response 1

Having read your draft CEC Environmental Strategy 2019 - 2024, I note that the proposed measures, though noble in themselves, do not address a main underlying cause of perceived problems.

That is the fact that the population is three times the size it was when I was a lad (U.N.). Up from 2.5 billion to 7.7 billion, projected to rise half as much again within thirty years.

This is why we have rampant urban sprawl, congested roads, habitat loss etc. etc..

We are going to have yet ever more urban sprawl and pressure on the environment, not the least being the need to feed the growing hordes.

No one with any kind of public profile has the guts to acknowledge this trend as a main cause of the problem. That we are facing the fallout from a plague of humans.

Strategies should be developed to ensure the population is stabilized by persuading people to have no more than two children and preferably less. Unless this is done, I can't see that we will ever make a better world. However it is likely that measures like that won't be on the horizon until it is far too late.

Anonymous response 2

I am very pleased to read the aims of Local Plan regarding environmental issues and hope every effort will be made to carry out said plans. The introduction of food waste collections is a very good start.

It is good to hear that the council is striving to “protect and enhance the natural environment, reduce the carbon footprint, conserve biodiversity, protect trees and woodlands, examine potential for tree planting, a 3 tree replacement for every one removed.”
These are worthy aims with a greener country in sight and I do hope Cheshire East can become one of the first councils to show what is possible with good leadership.

I am preoccupied however with the continuing threat of 225 houses being erected on a site of biodiversity near Longridge. It seems to contravene all your aims and objectives. There are many oak trees, Scot’s pine, 16 Red and Amber birds including Redwing that use the site regular, hand 9 other bird species in this category visiting less frequently. At least 4 species of African birds migrate here to nest: Whitethroat, Willow Warbler, Chiffchaff, Blackcap. Badgers, hedgehogs, stoats and weasels, bats and Great crested newts are also present.

Ripping up this land for housing seems criminal. Should we not be encouraging people to visit this amazing site to see some of this wildlife? It would surely bring many visitors to Knutsford. The area has its own beauty in every season and has Boothsmere and Birkin Brook in addition to green space. I gather that water in addition to green space is important to mental health.

I hope you will examine your consciences at this time of the world’s awakening to our destroying of the natural landscape. We are part of nature and must respect that part of ourselves not commit suicide.

Anonymous response 3

I write to voice my concern and objection to plans to try to put car parking on 25% of the above allotments. Such a plan is contrary to your declaration of climate change emergency! You (Cheshire East) are the freeholder of the site and should have the final say on any change of use. Car parking runs contrary to environmental considerations such as flooding/drainage, destruction of wildlife habitats - plus we should be discouraging increased car usage!!

Anonymous response 4

I recently completed the questionnaire on this consultation. I then received your annual newsletter about the local services and plans and noted a significant list of new road building projects in the area.
This seems completely contradictory to sections 4 and 6 of the consultation

4. The availability and use of sustainable transport and travel will increase and

6. We will manage the environment to restore nature, conserve heritage and enhance the beauty of our landscapes

I am very much against this. The money should be used instead to support ambitious plans for safe cycling routes and mass public transport as well as restoring our green spaces.

More roads = more cars, and people are less likely to find alternative transport if they can drive more conveniently and more quickly.

This says to me that the council are not serious about climate change and are not serious about making it easier for residents of Cheshire East to make sustainable choices about how they travel.

It also tells me that the council are not serious about protecting biodiversity by destroying established ecosystems to build roads. These cannot be replaced by planting a few trees once the road is completed.