

Appendix 2: List of Consultees and Responses

Consultee	Response
Environment Agency	No response
UK Health Security Agency	<p data-bbox="508 312 2056 379">Thank you for the opportunity for the UK Health Security Agency (UKHSA) to comment on the draft Air Quality Strategy prepared by Cheshire East Council, covering the period between 2024 and 2029.</p> <p data-bbox="508 421 1167 456">UKHSA's approach to improving air quality</p> <p data-bbox="508 459 2096 676">UKHSA's position is that some pollutants, such as nitrogen dioxide (NO₂) and particulate matter (PM), are non-threshold – i.e. there is no known level of exposure below which health impacts don't occur. This means that any improvement in air quality, even below Air Quality Objective Levels / Standards, is associated with benefits to people's health. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as by increasing active travel and physical exercise or improving access to and quality of greenspaces).</p> <p data-bbox="508 718 2107 1046">As outlined in our 2019 review of interventions to improve outdoor air quality and health, we recommend that evaluation is embedded in the design of any air-pollution focussed interventions from their outset and to systematically gather evidence of their impact and effectiveness. We suggest that it is beneficial to seek the implementation of the evaluation methods at the planning stage, and furthermore, the potential air quality impacts and subsequent population health impacts of developments which may lead to changes in air quality should be considered even at levels below Air Quality Standards / in Air Quality Action Plan areas. We note the intention to align the Air Quality Strategy with other relevant council strategies and would welcome the opportunity to support the integration of air quality improvements and associated co-benefits into the strategic spatial and transport planning process.</p> <p data-bbox="508 1088 1025 1123">Recommendations / Observations</p> <ol data-bbox="555 1161 2083 1449" style="list-style-type: none"> <li data-bbox="555 1161 2083 1267">1. The objectives outlined in pages 8-9 of the Strategy are notable in that they seek to improve air quality in areas where air quality standards are met; as noted this is in alignment with UKHSA aims around air pollution reductions. <li data-bbox="555 1270 2083 1343">2. UKHSA may be able to support Cheshire East in the assessment of the impacts of and the opportunities presented by the drive towards net-zero and would welcome the opportunity to discuss this in future. <li data-bbox="555 1347 2083 1449">3. We note the proposed indicators of progress in the Strategy document; given the role of regional spatial and transport planning in the long-term embedding of car journey dependency, we would suggest an additional focus on engaging with these stakeholders to highlight the impacts of these decisions.

	<p>4. Given that not all spatial planning developments require Environmental Impact Assessments, consideration should be given to the assessment of smaller developments and the need for additional indicators or focus relating to the cumulative impact of these proposals.</p> <p>5. Consider the impact and opportunity of Environmental Net Gain on Air Quality with regard to proposed developments.</p> <p>Cheshire East response:</p> <ul style="list-style-type: none"> Noted and we will look to work with UKHSA further in the future
Cheshire West and Chester Council	No response
High Peak Borough Council	No response
Manchester City Council	No response
Newcastle-under-Lyme Borough Council	No response
Shropshire Council	No response
Staffordshire Moorlands District Council	No response
Stockport Metropolitan Borough Council	No response
Trafford Metropolitan Borough Council	No response
Warrington Borough Council	No response
CPRE Cheshire	CPRE (formerly the Campaign to Protect Rural England), Cheshire Branch, has a number of comments to make in relation to the Cheshire East Council (CEC) consultation on its draft air quality strategy for 2024 – 2029. Air quality is an issue that concerns CPRE, not only because of its impacts on health and the quality of life and the fact that poor air quality can put people off from active travel but because of its inter-connection with climate change.

It is crucially important that CEC sees the climate emergency as the key, over-arching glue that binds together so many of its plans, policies and strategies such as the Local Plan, the Local Transport Plan, the Air Quality Strategy and the Carbon Neutrality Action Plans – with a view to attaining carbon neutrality across the Borough by 2040.

It is therefore disappointing to note that the Council recently set back its target for itself as an entity to become carbon neutral by 2035 to 2045. It is also worrying that the draft Air Quality Strategy being consulted upon does not even mention climate change or the climate emergency in either the executive summary or the conclusion. Nor is it featured in Fig. 1 which illustrates ‘Inputs and outcomes’. Nor is it mentioned under ‘Central Government Framework’ in paragraph 3.1. In fact, it is only mentioned specifically twice – in the first bullet point of para. 4.1 (as a “such as”, along with health improvement programmes) and in para. 4.4, (along with ‘energy management’). At the same time as responding to this consultation, CPRE has been making a substantial submission on the first stage consultation in relation to the new local plan Issues Paper. Question 3(c) in this ongoing consultation is: “How can the local plan help to improve air quality across Cheshire East?” Our answer to this is: “CEC needs to adopt a different mindset. It cannot, on the one hand, be declaring a climate emergency and publishing fine words about tackling climate change and poor air quality and, on the other, be endorsing developing on a peat bog and building new roads. Its actions need to comply with its words if it is to square the circle. It should be taking all actions possible to reduce the need to travel – by ensuring everyone has access to good digital connectivity and communities are sustainable entities – and, when residents do need to travel, providing them with sustainable and seamless public transport options and good conditions for active travel”.

This followed on from us having drawn attention in the local plan consultation to the fact that Cheshire East is amongst the most polluting authorities for greenhouse gas emissions according to the map published in October by the Department for Energy, Security and Net Zero that was posted on the Department for Transport website: <https://maps.dft.gov.uk/ghg-emissions-by-local-authority/index.html>. Note particularly the map for 2021.

CPRE would also like to make the point that it is odd for CEC to be holding a consultation on air quality without featuring as part of it key information that is held, ie: https://opendata-cheshireeast.opendata.arcgis.com/datasets/6d51fb621fc948b2bd6a381f523b2960_0/explore and also: <https://cheshireeast.maps.arcgis.com/apps/MapJournal/index.html?appid=c91838f3f37e428a89bc743948a3e929>.

It is not appropriate that respondents should be expected to hunt around the CEC website to source such fundamental information. However, from these sources it is possible to discern that insufficient monitoring is taking place (from any permanent sites) around Manchester airport and close to the M6 and M56 in particular. There is also no information supplied on where, if anywhere, random monitoring takes place around the borough. CPRE regrets to have to conclude that the draft Air Quality Strategy is an inadequate and unimpressive document.

	<p>Cheshire East response:</p> <ul style="list-style-type: none"> Cheshire East becoming carbon neutral is referenced in the introduction, aims and objectives, Figure 1 highlights the Environment Strategy and the Carbon Neutral Action Plan and these are discussed in sections 3.6 and 3.7 respectively Monitoring takes place where sensitive receptors would be expected to spend a significant amount of time. We do have a current monitoring location close to both the M6 and M56 and historically we have had several monitoring locations along the M6, although due to measuring low concentrations of NO₂ these have been removed.
<p>Member of the public</p>	<p>May I applaud your Air Quality Strategy, I am very aware of the harm that is being done. I have some observations:</p> <p>I noted the Anti Idling Campaign, can I strongly suggest this is not enough, a more proactive nudge approach should be applied (in conjunction with raising awareness). This needs to be enforced, whether through the current civil enforcement team or a specific 'green team' so to speak and yes that does mean fines. I seem to recall a more proactive approach was taken in the past to littering particularly cigarette stubs in the town centre I live in (by the way please consider cigarette smoke drift also, you could do a lot worse than enforcing smoke free legislation more proactively, I suspect many a coffee shop/Café' is allowing smoke to enter their premises, with an abundance of smokers near their entrances and I actually had to ask a vaping member of the public to not smoke inside recently, I can't remember seeing a no smoking sign on a coffee shop front doors recently.</p> <p>We know that despite initial objections making wearing a seat belt law has saved countless lives, we know that a sugar tax has greatly reduced obesity and of course indoor smoking bans have saved many lives (e.g., those that used to work in such environments). These measures have and are continuing to make a difference. We are always faced with the cry of civil liberty or self-interest (think tobacco industry or climate change deniers etc) but the silent majority and our children deserve their freedoms and civil liberties to be protected also, not least the air they breathe.</p> <p>Cheshire East response:</p> <ul style="list-style-type: none"> Noted and the enforcement of vehicle idling has been considered by the Highways and Transport Committee on 23 November 2023
<p>Member of the public</p>	<p>I am sending this email to give my feedback on the draft air quality strategy as outlined at https://www.cheshireeast.gov.uk/business/environmental_health/local_air_quality/local_air_quality.aspx. Firstly though, I would like to make it very clear that I am writing this email [REDACTED].</p> <p>[REDACTED]. Second, I should say that I've not read any previous versions of the strategy, so I'm commenting on the document as a whole and not any changes that have been made.</p>

Comments as follows:

- Section 4.1: You state that you wish to make monitoring data available on the Cheshire East Website. Currently, the data presented is the absolute bare minimum annual averages for compliance purposes and an ambition to improve on this would have been welcome. In order to meet the stated objective “Raise the profile of air quality amongst the local communities across Cheshire East.” (among others) it would be much better to present more of the data, as many other councils do (e.g. Greater Manchester), specifically hourly data from the automated sites (ideally in near real time) and individual tube data from the diffusion tubes.
- Section 4.2: I would have perhaps hoped for some specific ambition here regarding the promotion of electric vehicle charging infrastructure and heat pumps, through either promoting design choices at the planning stage and/or more proactively holding developers to account.
- Section 4.3: I notice there is no mention here of improving air quality through encouraging the use of public transport or electric vehicles. This is disappointing, although I note you touch on public transport very briefly in 5.5 (without giving detail)
- Section 4.3: What exactly does “Work with the relevant Highways Authorities to improve air quality within AQMAs” mean? What sort of effective actions could result from this?
- Section 4.3: Education regarding anti-idling is mentioned, but by its omission, can I take it that you do not plan to enforce this?
- Section 4.3: You state “make sure vehicles comply with emission standards” but most of this is covered by the DFT through type approvals, MOTs, etc. What do you intend to do over and above this as a local authority?
- Section 4.5: It’s disappointing that you are choosing to act alone as a council rather than working with and leveraging national resources, e.g. Air Quality England
- Section 4.6: What exactly does “support the public with domestic solid fuel burning” mean?
- Section 4.6: Cheshire East’s smoke control areas are limited to parts of Crewe and some very oddly specific areas of Wilmslow, and most date from the 1960s and 1970s and would arguably not reflect current domestic emissions and exposure, so focusing on these and their boundaries is likely not going to be effective on a practical level. Producing a more up to date assessment of the influence of domestic burning emissions in Cheshire East would be more ideal.
- Section 4.6: In addition to fuels sold at retail, work could be done to improve public awareness regarding privately-acquired fuels, such as discouraging the burning of waste wood (in particular treated and painted wood) and encouraging the proper preparation of wood from tree thinning/felling.

	<ul style="list-style-type: none"> • Section 4.6: On top of the above, it might be anticipated that there will be an increase in garden waste burning in response to Cheshire East’s recent introduction of kerbside garden waste charges and closures of tips. I would be reassured if Cheshire East planned to at least monitor for this. • Section 4.8: This is a national strategy and it’s not clear what Cheshire East actually plans to contribute, if anything. • Section 4.9: This section is very light. Do you plan to engage with any national-level resources here? Do you plan to act on private properties, public buildings, workplaces or all of the above? Or given that this does not feed into any of the measures of success in section 5, do you even plan to do anything at all? • Section 4.11: “Robustly monitor the progress of the Council’s actions in implementing this Strategy” would be a more effective statement if you could say what this would involve. Who is doing the monitoring and who do they report to? • Section 5.1: Cheshire East’s monitoring is (by and large) dictated by areas that already have problems and mostly limited to diffusion tubes, so it’s not clear how its monitoring activities will identify new problem areas, unless you plan to proactively use measurements to survey areas? • Table 5.1: If targets 1 and 2 are met, this will likely be because of natural vehicle fleet turnover that this strategy has no influence on (that I can tell). While these would certainly be good outcomes, they are a questionable measurement of success of this strategy. If you could qualify any successes as being “attributable to actions performed within the strategy”, it would be far more impressive. <p>Cheshire East response:</p> <ul style="list-style-type: none"> • Monthly raw diffusion tube monitoring data is published on the website, alongside the annual averages. • Electric vehicle infrastructure is recommended through the Development Management process and we now also have Building Regulations Approved Document S: infrastructure for charging electric vehicles • Through the Taxi Licensing Policy emission standards of vehicles now need to meet required minimum standards, failure to do so results in the vehicle being removed from the licensing regime. • Smoke Control Areas are located within areas of Crewe, Wilmslow, Handforth and a small area of Disley. A borough wide review of these areas will be undertaken in the future. • New monitoring locations will be considered by using local knowledge, requests from members of the public and the Development Management process to map new development. • Several bullet points have been expanded to aid clarification.
Member of the public	<p>Ref item 4.6. Domestic Burning and Smoke Control Areas</p> <p>There are instances of Scrap collectors etc burning the plastic coating off COPPER wiring to reclaim the copper & sell to scrap dealers.</p>

	<p>This tends to happen late at night to avoid detection, often in back gardens or on public land very close to the offending inhabitants houses. Instances have happened around areas [REDACTED]. Though I'm sure it happens in other areas too.</p> <p>Concern surely should be raised as to the harm from carcinogens released into the air from such practices the smell from the acrid smoke is unmistakable!</p> <p>Any steps to PUBLICISE & deter this illegal practice should be taken imho.</p> <p>Cheshire East response:</p> <ul style="list-style-type: none"> Noted and for information complaints of this nature can be made to the Environmental Protection team to investigate.
Member of the public	<p>I refer to the request for comment on the air quality in the area.</p> <p>I am extremely concerned about the air quality caused by the amount of traffic on the Wilmslow by-pass ie. the A34.</p> <p>This road has a speed limit of 70mph, exactly the same as the M1 and the M6 among others and without the benefit of a hard shoulder!</p> <p>As a general rule many motorists drive at a faster speed than this. [REDACTED]</p> <p>Clearly, it's much more than 70mph and in fact it's well know that it's frequently used as a speed track particularly at weekends.</p> <p>Groups of motorcyclists travel up and down racing each other, as do sports cars.</p> <p>As a result of these illegal speeds the amount of pollution is increased exponentially!</p> <p>If you walk along the pedestrian and cycling path at the rear of [REDACTED] on any day of the week, the clouds of petrol and diesel fumes are frequently quite overwhelming.</p> <p>It's only a matter of time before there is a tragedy and as someone who lives overlooking the Motorway, I can't describe it in any other way, I dread this happening!</p> <p>There are many days in the summer when it is impossible to spend time in my garden.</p> <p>I'm sure that a reduction in the speed on this road would decrease the amount of pollution created by these vehicles and make life healthier for residents!</p> <p>Cheshire East response:</p> <ul style="list-style-type: none"> Noted and Cheshire East does have a Speed Management Strategy in place, which considers air quality.
Member of the public	<p>We [REDACTED] and have really noticed the air quality has deteriorated. If you walk into and out of Congleton town along [REDACTED] you cannot only smell the vehicle fumes but taste them, the amount of dust from the construction sites also irritates your eyes. Not only is this bad for residents but also the pupils at [REDACTED].</p> <p>The amount of dust is also getting into our houses in summer when we need to open windows to keep cool.</p>

	<p>With all the extra housing in the area there are more cars travelling at speed along the road into and out of town. This is causing not only a pollution problem, as cars are queuing at the pinch point nr to [REDACTED], but a pedestrian safety problem.</p> <p>There is also a noise problem from all the extra vehicles using [REDACTED], one of our neighbours, who lives alongside the road, recently said it's got so bad they cannot sit out in their garden.</p> <p>We that is the local residents have all said the speeding along the road is getting worse with cars overtaking those keeping to 30mph right before the junction to [REDACTED].</p> <p>The quality of life in our area has really gone down since we moved here, if it was not for [REDACTED] we would move again out of the area all together.</p> <p>Cheshire East response:</p> <ul style="list-style-type: none"> • Noted
Member of the public	<p>I have looked online at the AQMAs in Crewe and cannot find any up to date information.</p> <p>The volume of traffic on [REDACTED] has more than doubled over the past few years. There are 3 massive separate housing developments [REDACTED] and nearby [REDACTED] which are contributing to the volume of traffic, many heavy goods vehicles, as [REDACTED] is signposted for access to the town centre.</p> <p>There are frequently queues from vehicles trying to turn onto [REDACTED] and the nearby roundabout at [REDACTED] exacerbates this. The area is choked with vehicle fumes at times. This is a residential street and drivers keep their engines running while queueing.</p> <p>We think this area should be monitored as the traffic situation has clearly changed for the worst since the last AQMAs were published.</p> <p>Cheshire East response:</p> <ul style="list-style-type: none"> • AQMAs are not routinely published they are declared until monitoring provides evidence they are consistently below the air quality objective and then they are revoked. We have previously monitored on North Street which is around this area.
Member of the public	<p>I am appalled by the provision of EV infrastructure in the county. Every French village of a few hundred people has more public charge points than Cheshire East. Last year, the council voted not to pursue idling engines (which is actually already an offence under the Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002. This demonstrates that the Council shows utter disregard for what is needed: Of course much of the constituency is scoring fine; we're largely rural, for Christ's sake... It very much feels like the Council is just busy on window-dressing whilst avoiding to address any real issues. Our children will call you out on it! It is an utter shambles as it is!</p> <p>For what it's worth: [REDACTED] because this Council does not seem to be inclined to tackle what is, unquestionably, the by far largest issue of our lifetime!</p>

	<p>Cheshire East response:</p> <ul style="list-style-type: none"> Noted. Cheshire East now has an Electric Vehicle Charging Strategy in place and continues to bid for funding to deliver increased EV infrastructure.
<p>Member of the public</p>	<p>Thank you for the opportunity to comment on the draft revised Air Quality Strategy. While the revised policy seems generally sensible, I am concerned that Cheshire East are currently following various policies that will seriously damage air quality.</p> <p>Paragraph 3.5 of the draft Policy states: “... <i>the biggest contributor to air pollution within Cheshire East is road transport.</i>” However, Cheshire East is currently promoting policies that will have the direct effect of increasing road traffic:</p> <ul style="list-style-type: none"> The imminent closure of the Household Waste and Recycling Centres at Poynton, Bollington and Middlewich. Residents of Poynton, Adlington, Disley, Bollington, Prestbury, Pott Shrigley, Mottram St Andrew, Handforth and Wilmslow will have to take their waste to the remaining site on the Moss, south of Macclesfield. A journey to the Macclesfield HWRC site from anywhere in the Poynton area means a return journey that is 13 miles longer. On current usage figures that would mean an extra 226,000 miles driven on tip journeys from Poynton (closing Bollington would add about another 100,000 miles). Using an average of 40 m.p.g. this equates to over 5,700 gallons of petrol or diesel used in a year. The policy of running down and threatened future closure of Poynton Leisure Centre (and other Leisure Centres across Cheshire East). There are no alternative facilities in Poynton, residents will be expected to travel to leisure facilities in Macclesfield, Bollington or Stockport. The reduction of bus services in Poynton from one bus an hour in 2019 to one every two hours, with no service at all after early evening or on Sundays. There are continuing fears that the 391/ 392 service will be withdrawn altogether, leaving Poynton (and also Adlington and Pott Shrigley) with no buses at all. The only alternative is the car. The policy of building new housing estates in the Green Belt on the edge of towns, long distances from shops and other facilities. Again, there is no real alternative to the private car for residents. <p>A further concern is how exactly Cheshire East plan to measure air quality. Dangerous pollutants include nitrogen oxides (NO₂) and particulate matter (PM). The draft Policy states in Section 5.1: <i>“Cheshire East has a network of NO2 monitoring sites and a RTA [Real-Time Analyser] located at Disley. The RTA measures NO2 and PM. The measurements obtained will be used to directly report on trends in air pollution concentrations. The measurements will provide a long-term indication of overall air quality across Cheshire East and will help to identify areas which maybe exceeding the objectives.”</i></p>

	<p>However, Cheshire East maintain only one diffusion tube in the whole of Poynton. The policy implies that a single machine in Disley provides the Particulate Matter data for the whole of Cheshire East. This seems wholly inadequate – one diffusion tube in a small town like Poynton provides little coverage across a small town, and Disley is one site in the far north-east of Cheshire East. PM readings there can hardly be applied, for example, to Crewe, which is over thirty miles away.</p> <p>There are also other dangerous pollutants, such as sulphur dioxide, ozone, benzene, lead and butadiene. If Cheshire East do not monitor them, how do they know these are not at dangerous levels?</p> <p>Please could you take these points into account when considering Air Quality strategy.</p> <p>Cheshire East response:</p> <ul style="list-style-type: none"> • The location of monitoring is reviewed every year and try ensure we have reasonable coverage of the borough. There have been more diffusion tubes in Poynton in the past, but these were removed due to showing good compliance with the air quality objective. We follow Defra Technical Guidance and our own monitoring procedure. • Defra have advised that in recognition of the fact that all of the objectives for Benzene, 1,3-Butadiene, Carbon Monoxide and Lead have been met for several years and are well below objective values, local authorities do not have to report on these pollutants unless local circumstances indicate otherwise.
Transition Wilmslow	<p>Well done for doing a strategy and stressing the importance of the work on reducing carbon emissions from transport. Not much one can say on it, but can you do more to allow the closure of roads for events - to make it more easy to getting people walking and cycling, like we did in Wilmslow for the Festival of Nature in 2022? It was very hard to get it accepted - but it a) reduced pollution b) got a lot of people out to walk and cycle there c) was, of course, fun for all!</p> <p>Cheshire East response:</p> <ul style="list-style-type: none"> • Noted
Member of the public	<p>Firstly, I welcome the update to the strategy, particularly given the changes to environmental legislation post-Brexit, and welcome this opportunity for consultation with the wider public.</p> <p>[REDACTED], drawing on the knowledge and facilities of [REDACTED].</p>

I have researched the latest legislation at some length and have to comment that it is incredibly confusing. Hence, I would strongly recommend that you include in the paper some clear statements as to which organisations have legal responsibility for each of the following:

- Monitoring the pollutant
- Taking action to reduce concentration of this pollutant
- Checking and enforcing the action

Of course this may be different for each pollutant of interest.

██████████ has been the monitoring of PM_{2.5}, primarily because of the increasing scientific evidence of the dangers of small-particulate pollution, and the consequential tightening of WHO guidance levels for human exposure.

As far as I can tell, for PM_{2.5} it is Defra who does the monitoring through the AURN network, but the Local Authority has the responsibility to take any required action. Do please clarify this in the strategy paper.

It is also not very clear over what geographical areas PM measurements should be taken or averaged. There seem to be several definitions of geographical zones – one is North-West and Manchester, and another is Cheshire east. The legislation appears to say that if a zone has >250,000 population (CE is approx. 400,000) then there should be at least 3 monitoring stations – but the AURN network only has one station (at Crewe) and CEC has just commissioned their own local station in Disley. It would be very helpful if the strategy paper could clarify the legal requirement for monitoring.

The strategy paper references some of the background documents and web sites, but I found several more which appear to be relevant:

- Environment Act 2021
- Air Quality (England) Regulations 2000
- Air Quality Standards Regulation 2010
- Air Quality Standards Regulations 2020
- Environmental Targets (fine particulate matter) (England) Regulations 2022
- Environmental Targets (fine particulate matter) (England) Regulations 2023
- Air Quality Strategy: framework for Local Authority delivery (2023)
- Environmental Improvement Plan 2023

Finally, there is [the uk-air Defra site](#) for AURN - Automatic Urban and Rural Network.

It would be very helpful if the strategy paper could list all the appropriate links to legislation and other involved organisations (Defra etc).

I note that the paper has a table listing all the air pollutants covered by legislation, but the monitoring and action plans in the paper only mention NO_x and PM. It isn't clear from this who monitors and takes action on all the other pollutants. Of major concern would be ammonia for example. Could you please clarify the responsibilities of CEC for all the other pollutants.

	<p>I would also have expected a review (or reference to a review) of the previous 5 year period, to be used in informing the next period's strategy – ie what were the targets, action plans, results, and outstanding issues. I couldn't find such a review on the CEC website, and it would be very helpful to have a summary of such a review included (or referred to) in the paper.</p> <p>Cheshire East response:</p> <ul style="list-style-type: none"> • The Annual Status Report is the document we produce each year which advises on the current monitoring and provides updates on the measures in the Air Quality Action Plan and the work undertaken by the team. This has to be submitted to and approved by Defra. • The indicators within the AQS are reported on annually and presented to the Air Quality Steering Group. • Defra have advised that in recognition of the fact that all of the objectives for Benzene, 1,3-Butadiene, Carbon Monoxide and Lead have been met for several years and are well below objective values, local authorities do not have to report on these pollutants unless local circumstances indicate otherwise. • Clarification included in the Strategy as to local authority and Secretary of State responsibilities, plus clearer links to legislation.
<p>Member of the public</p>	<p>Thank you for the opportunity to comment on the above draft strategy.</p> <p>██████████ relates to transport, which your draft strategy states in para 3.5 is the biggest contributor to air pollution in Cheshire East. I am particularly concerned about significantly reducing the contribution of motorised vehicles to poor air quality, and making our streets more pleasant to use and safer.</p> <p>The commitments in section 4.3 of the draft strategy are a good start but I think you should go much much further given the urgency of climate breakdown and the acknowledgement that 40% of households in CE have two or more cars; leading to a high dependency on driving. For example, I urge you to include further commitments such as:</p> <ul style="list-style-type: none"> • reviewing all speed limits especially on our country roads and lanes with the aim of reducing the limit • changing the default from 30mph to 20mph in residential areas so that only roads which are safe enough to stay at 30mph do so • adjusting transport and highways funding to reduce spending on road schemes for motor vehicles and significantly increase spending on schemes to support and promote walking, cycling and using public transport. Schemes to support walking and cycling in particular are very cost effective, have high cost benefit ratios and are often quick and easy to deliver. <p>Regarding 20mph speed limits in built up areas, there has until recently been a question mark over whether reducing speed limits to 20mph increases air pollution. Recent research shows that when the stop/start nature of</p>

	<p>traffic is taken into account, pollution is lower in areas where 20mph is the limit than in areas where 30mph is the limit. In 30mph areas drivers will try to accelerate up to 30mph between pedestrian crossings, traffic lights etc and create more emissions. https://futuretransport.info/wp-content/uploads/2022/05/Urban-Transport-Modelling-2022-05-16.pdf</p> <p>I think that additions like the above would reduce pollution in themselves, and increase the likelihood of getting more people to switch to active travel and public transport, thus improving air quality even more.</p> <p>Finally, regarding para 4.1 which includes the commitment to work with relevant partners such as highways, etc, to achieve the necessary improvements in air quality, my view is that this wording is far too weak. This topic is far too serious to be managed by "working with" other partners, especially partners which are also part of CE. In particular, CE Highways have a notorious reputation for being far too interested in car-dominated schemes and routinely allocate huge funds for road building at the expense of schemes to promote walking and cycling. Recently, I was unable to even convince CE to allocate a modest amount for on-street cycle parking in [REDACTED].</p> <p>[REDACTED] The wording of para 4.1 should instead say that other council departments should revise their policies, strategies and plans to be consistent with the AQ strategy and be required to submit plans to the AQ department for approval. The AQ department should have more influence. Regarding organisations outside of CE, I am happy with the wording "work with".</p> <p>I hope you will take my comments into account from a resident who feels passionately about this very serious issue.</p> <p>Cheshire East response:</p> <ul style="list-style-type: none"> • Wording in the AQS tweaked and to note that Cheshire East does have a Speed Management Strategy in place, which considers air quality.
Cheshire East Climate Alliance	<p>Please accept these comments on your Air Quality Management Strategy which is currently open for consultation. These comments are on behalf of the Cheshire East Climate Alliance (CECA) which brings together representatives of climate and environmental groups from across the borough. <i>We are also encouraging members of the various groups to comment individually if they wish to.</i></p> <p><u>Comments</u></p> <ol style="list-style-type: none"> 1. Firstly we welcome this current review of the strategy and in particular the continuation of objectives such as <ul style="list-style-type: none"> • raising the profile of air quality • ensuring that air quality is a major consideration in all policies and plans throughout the council

- the continuation of the Council Air Quality Steering Group as a means of involving all council departments
2. We note the inclusion of 4 new commitments and agree that it was right to add them
 - 4.6 Domestic Burning and Smoke Control Areas
 - 4.8 Agriculture
 - 4.9 Indoor Air Quality
 - 4.10 Fund Air Quality
 3. As a general comment we would have found it helpful if you had included a review (*or reference to one*) of the previous 5 year period, to be used in informing the next period's strategy. (For example we couldn't tell which were the new additional targets in Table 5.1.) We couldn't find such a review on the CEC website and would have liked to see something which included
 - a list of previous targets and how well we did against them
 - an updated action plan with responsibilities and time frames
 - a list of issues including funding shortfalls
 4. We understand the relevant legislation is very confusing and would like to have seen this document set out more clearly what the legislation is and how Cheshire East are applying it. In particular we would like to have seen
 - clarification of responsibilities between local authorities and DEFRA
 - clarification of the geographical areas over which PM measurements should be taken or averaged
 - whether the 2 monitoring stations we have in Cheshire East (an AURN station in Crewe and a local station in Disley) are sufficient for a zone with a population of around 400,000
 - responsibilities for monitoring and taking action on ALL pollutants including others such as ammonia
 5. We welcome indicator 5.4 on raising public awareness and wonder how many awareness days and other methods of communication there have been since 2018. We also note the 4th bullet under commitment 4.5 about getting local communities to become involved in improving air quality and would like to offer help in communicating that through our various mailing lists.
 6. We also wonder if there is any appetite to involve residents more formally in monitoring progress against the overall strategy. We believe you would find it easy to recruit people willing to become involved and we would be happy to help you find people with suitable skills and experience from among our extensive mailing lists.
 7. As a group concerned with climate and environmental action we recognise the synergy between pursuing action on air quality and reducing emissions. We meet over zoom every couple of months or so and are usually joined by [REDACTED]. We wonder if someone from your team would be interested in joining a meeting one

	<p>evening, perhaps in [REDACTED], and explore any ways in which we might help you in improving air quality throughout Cheshire East.</p> <p>Cheshire East response:</p> <ul style="list-style-type: none"> • The Annual Status Report is the document we produce each year which advises on the current monitoring and provides updates on the measures in the Air Quality Action Plan and the work undertaken by the team. This has to be submitted to and approved by Defra. • The indicators within the AQS are reported on annually and presented to the Air Quality Steering Group. • Defra have advised that in recognition of the fact that all of the objectives for Benzene, 1,3-Butadiene, Carbon Monoxide and Lead have been met for several years and are well below objective values, local authorities do not have to report on these pollutants unless local circumstances indicate otherwise. • Clarification included in the Strategy as to local authority and Secretary of State responsibilities, plus clearer links to legislation. • There are several pages on air quality awareness on our website, with lots of information. • More than happy to attend a meeting to discuss the work of the Air Quality team.
<p>Member of the public</p>	<p>Thank you for the opportunity to comment on the updated strategy, which I am very supportive of. [REDACTED] [REDACTED] which meets on an ad hoc basis to discuss issues of climate change and addressing the challenge to get to net 0. [REDACTED], I have seen the comments submitted by the CE Climate Alliance group and concur with their comments on which I have based my own comments below.</p> <ol style="list-style-type: none"> 1. I am pleased to see that the following objectives, in particular, are to be continued: <ul style="list-style-type: none"> • raising the profile of air quality • ensuring that air quality is a major consideration in all policies and plans throughout the council • the continuation of the Council Air Quality Steering Group as a means of involving all council departments 2. I agree that it is right to add the 4 new commitments: <ul style="list-style-type: none"> • 4.6 Domestic Burning and Smoke Control Areas • 4.8 Agriculture • 4.9 Indoor Air Quality • 4.10 Fund Air Quality 3. It would have been helpful if you had included a review of the previous 5 year period, including a list of previous targets and how well we did against them; an updated action plan with responsibilities and time frames; and a list of issues.

	<p>4. It would have been helpful if you had set out more clearly what the relevant legislation is and how CE are applying it. This could include clarification of responsibilities between local authorities and DEFRA; whether the 2 monitoring stations in CE are sufficient for a zone with a population of around 400,000; responsibilities for monitoring and taking action on all pollutants.</p> <p>5. It is good that you have identified the need to raise public awareness. It is very important to get local communities involved in improving air quality, and this can only be done if the problem is recognised by them.</p> <p>6. I feel that lowering speed limits, particularly in rural areas with narrow lanes, is an important step in reducing emissions as well as improving road safety for all users. There are many rural lanes in CE which have a 60 mile per hour speed limit and many drivers who use them do not have the common sense or courtesy to drive more slowly.</p> <p>Cheshire East response:</p> <ul style="list-style-type: none"> • The Annual Status Report is the document we produce each year which advises on the current monitoring and provides updates on the measures in the Air Quality Action Plan and the work undertaken by the team. This has to be submitted to and approved by Defra. • The indicators within the AQS are reported on annually and presented to the Air Quality Steering Group. • Defra have advised that in recognition of the fact that all of the objectives for Benzene, 1,3-Butadiene, Carbon Monoxide and Lead have been met for several years and are well below objective values, local authorities do not have to report on these pollutants unless local circumstances indicate otherwise. • Clarification included in the Strategy as to local authority and Secretary of State responsibilities, plus clearer links to legislation. • Cheshire East does have a Speed Management Strategy in place, which considers air quality.
20s Plenty for Cheshire East	<p>We welcome the fact that you are updating the Air Quality Management Strategy and that you have added new sets of commitments, albeit with little detail. Our response is in three parts:</p> <ol style="list-style-type: none"> 1. General Comments and an invitation 2. Transport related comments on the Commitments at 4.2 and 4.3 3. A note about how the implementation of 20s Plenty across Cheshire East could be a relatively easy win in the fight for better air quality <p>1. General Comments</p> <p>1a. We understand this is a top-level strategy document but we would have expected to see reference to a detailed action plan with responsibilities and detailed actions with measurable targets and time frames. We would have expected to see a summary of what has been achieved in the last 5 years and more detail on what was new.</p>

1b. It would have been useful to see a clearer picture of how all the legislation fits together and relates to the actions you are proposing.

1c. We wonder if any consideration has been given to form some sort of forum in which councillors (borough and local), officers and residents / community groups could come together regularly to assess progress. In the meantime we would love to have you join one of our 20s Plenty for Cheshire East regular zoom calls where we could discuss how such a forum might work and you could tell us what the team does on a day to day basis. The next one is [REDACTED]. We have them every few weeks.

2. Transport related commitments

2a. In 4.2 we would like to have seen explicit examples of how a new development of houses could **build in** good air quality with measures such as:

- supporting active travel with walkways, cycle paths and access to public transport
- making 20mph limits standard in new developments (this is allowed for within the current Speed Management Strategy)

2b. It was good to see a large number of commitments in 4.3 and we would like to have seen more ambitious wording and indeed in thinking. Examples follow:

2c Why do you need the first 4 words in this sentence? 'When the opportunity arises, work with freight operators and organisations to establish appropriate freight routes, delivery routines and driver practices to minimise congestion and pollution.' There are many roads throughout Cheshire East which are awful places to be because of the number of lorries that pass through them. **We need to make our own opportunities** - not wait for something to happen. **And the objective should be to get much more road freight onto rail.** If we do this, not only will air quality be improved but road surfaces will suffer less damage and need less maintenance.

2d The next commitment after that is particularly weak: 'Ensure there is a regular exchange of information between transport planners and air quality professionals to include air quality and traffic information and details of any new road proposals.' In many cases new roads will only make things worse and we need to set the bar a lot higher in allowing them to go forward.

2e The commitment after that is about promoting and supporting opportunities for active travel. The only way you will increase active travel is by making roads safer and pleasanter for walkers and cyclists. For many people that means separate cycle paths, but they cost a lot of money. For me it is about creating a **culture of much more responsible driving, lower speed limits and much less tolerance of driving offences.** It will take a concerted effort with the council working with the police, large employers, health professionals, neighbouring authorities and so on. It will feel like a never-ending task but for all the people who moan there will always be a lot more who support such leadership.

2f We could not see any mention of pollution caused by aircraft and the proximity to Manchester Airport. Even if that really is outside the council's control there must be some mitigating action that could be taken. Leading on

from that we are curious as to whether any thought has been given to linking actions to improve air quality with those to decrease noise,

3. Potential for 20s Plenty for Cheshire East to improve Air Quality

3a The people who support the campaign believe that if Cheshire East adopted a 20s Plenty approach this would go a long way towards making our roads safer and our streets nicer places to be, with less pollution.

3b There is some misunderstanding about what 20s Plenty for Cheshire East would actually mean and I would welcome an opportunity to allay some of the misconceptions about what we would be asking for in more detail.

3c. Very briefly the ask is this:

- In areas where the current default is 30mph we are asking for the default to be set to 20mph. Where there is consensus that the road is safe enough to remain at 30mph, taking into account the needs of non-motorised road users (walkers, cyclists, horse riders, motability scooters) then that road can stay at 30mph
- We are not asking for expensive new infrastructure. Speed bumps and chicanes only reinforce the idea that 30mph is normal. They also encourage a style of driving that is not good for air quality.
- We are asking for the default to be across the whole of Cheshire East so that it becomes normal for people to drive at 20mph in areas where a lot of non-motorised road users are about.

3d. One particularly relevant misunderstanding, even among some supporters, is about the relationship between lower speed limits and pollution / emissions. The argument used to go that lowering speed limits would lead to safer roads and that would lead to more active travel and that would lead to less pollution, regardless of whether engines pollute more at lower speeds. That remains a valid and strong argument but it has recently been shown that **lower speed limits in themselves can lead to significantly less pollution and emissions if implemented in the right way.** <https://futuretransport.info/wp-content/uploads/2022/05/Urban-Transport-Modelling-2022-05-16.pdf>

Cheshire East response:

- The detailed Air Quality Action Plan, which links to the AQS can be found on our [website](#).
- The [Annual Status Report](#) is the document we produce each year which advises on the current monitoring and provides updates on the measures in the Air Quality Action Plan and the work undertaken by the team. This has to be submitted to and approved by Defra.
- The indicators within the AQS are reported on annually and presented to the Air Quality Steering Group.
- Defra have advised that in recognition of the fact that all of the objectives for Benzene, 1,3-Butadiene, Carbon Monoxide and Lead have been met for several years and are well below objective values, local authorities do not have to report on these pollutants unless local circumstances indicate otherwise.
- Clarification included in the Strategy as to local authority and Secretary of State responsibilities, plus clearer links to legislation.
- Cheshire East does have a [Speed Management Strategy](#) in place, which considers air quality.

	<ul style="list-style-type: none"> • More than happy to attend a meeting to discuss the work of the Air Quality team. • Wording in the AQS tweaked.
Member of the public	<p>I have read the draft strategy and wish to support the aims of the strategy in improving air quality for everyone who lives and works in our county.</p> <p>I have one specific comment: session 4.3 picks out a number of practical ways to reduce the detrimental impact of road traffic. For instance, education about the impact of idling.</p> <p>Can you please add another practical strategy here. Reducing the pollution caused by stop-start motoring in populated areas. The default 30 mile an hour limit encourages this far more than a default 20 mile an hour limit in built-up areas. There is clear evidence for this here: https://futuretransport.info/wp-content/uploads/2022/05/Urban-Transport-Modelling-2022-05-16.pdf</p> <p>Areas with a 20 mile an hour speed limit have less pollution compared with those with a 30 mph speed limit. Cheshire already has a speed management strategy which allows for the implementation of 20 mile an hour zones once an assessment has been carried out. There is a clear positive linkage here between the two strategies.</p> <p>Cheshire East response:</p> <ul style="list-style-type: none"> • Noted and Cheshire East does have a Speed Management Strategy in place, which considers air quality and various linkages.
Member of the public	<p>Thank you for the opportunity for the public to respond to your consultation about the Air Quality Strategy for Cheshire East. We do think this is a very important aspect of our care for the environment and our fellow citizens, so we are pleased that you are updating the strategy. We are however not by any means experts or specialists in this field, so what we have to say is general in nature, and arises from input from those we know who do have this knowledge.</p> <p>There is a reference in section 2 to the current strategy dated 2018, but the paper does not set out any results or analysis from this as a basis for future action (e.g. targets, action plans, results, and outstanding issues). It would be helpful to have some reference to this in the paper.</p> <p>It is not clear to us from the paper who is legally responsible for monitoring the different pollutants covered by the legislation, and for taking and enforcing action. There is a table listing all the air pollutants covered by legislation, but the monitoring and action plans in the paper only mention NOx and PM. One other major concern would be ammonia for example. Could the paper clarify the responsibilities of CEC for all the other pollutants?</p>

	<p>Can you also clarify the legal requirements for monitoring – we are not sure what the geographical areas are for measuring. For example, how many monitoring stations should Cheshire East have, and what are the plans to make sure this is achieved?</p> <p>Finally, in Section 4.3 we specifically welcome the commitments to reducing emissions, reducing car use and promoting active travel. We would suggest you also review speed limits, with a view to reducing them, especially in residential areas, to reduce pollution and increase safety, thus encouraging active travel.</p> <p>And in 4.4 we note with approval the intention to embed air quality objectives into Carbon Neutrality plans, as in our view the achievement of NetZero should be a major priority.</p> <p>Cheshire East response:</p> <ul style="list-style-type: none"> • The Annual Status Report is the document we produce each year which advises on the current monitoring and provides updates on the measures in the Air Quality Action Plan and the work undertaken by the team. This has to be submitted to and approved by Defra. • The indicators within the AQS are reported on annually and presented to the Air Quality Steering Group. • Defra have advised that in recognition of the fact that all of the objectives for Benzene, 1,3-Butadiene, Carbon Monoxide and Lead have been met for several years and are well below objective values, local authorities do not have to report on these pollutants unless local circumstances indicate otherwise. • Clarification included in the Strategy as to local authority and Secretary of State responsibilities, plus clearer links to legislation. • Cheshire East does have a Speed Management Strategy in place, which considers air quality.
Member of the public	<p><u>Summary:</u></p> <p>From a [REDACTED], [REDACTED] those actions relating to transport. I support all the commitments in section 4.3 of the strategy paper although I would like to see more ambition in them.</p> <p>My main concern is that some people might propose that Air Quality can be improved by encouraging everyone to switch to electric vehicles. This would do nothing to resolve all the road safety problems in Cheshire East or to prevent the deterioration of road surfaces and would mean we miss out on other potential benefits such as less congestion and health benefits of more active travel.</p> <p>I would urge you therefore to protect and indeed strengthen those commitments which can also improve road safety for pedestrians, motability scooter users, horse riders and cyclists.</p> <p><u>Detail</u></p>

██████████ and we were shocked when we settled in to realise how bad the traffic is, both on the ██████████ and the roads that go both ways from the traffic lights (██████████.)

Around ██████████ I attended a meeting on Air Quality. It was not a formal parish council meeting but it was chaired by a parish councillor and several others were there. One member of the public told us how ██████████ ██████████ that he stay away from the centre of the village due to the effect the poor air quality would have on his medical condition. *The surgery, the pharmacy and all the other shops are very close to the centre of the village.* We all agreed this was a terrible indictment of the situation.

I got the impression that the parish council were very keen to improve Air Quality and road safety. There was talk of working with Network Rail and the Quarrying companies in the Peak District to move the transportation of aggregates from road to rail, which would have taken a lot of lorries off the road and councillors seemed keen to take this forward.

You will know that a monitoring station has been set up in Disley. I just looked at the Parish Town Council website's air quality page

<https://disleyparishcouncil.org.uk/your-council/air-quality-in-disley-2/>

At the top of the page is the annual monitoring report 2023, the headline of which is that there were no significant problems. The rest of the page contains a lot of information, some from several years ago. It is quite confusing.

I have just checked the parish council minutes for the last 3 months and could not see any mention of air quality apart from this:

"Cllr. Brownbill reported that he and Cllr. Pattison had recently visited ██████████ and met with the Student Council. He reported that this had been a very successful visit and hoped that stronger links would continue to be made between the Council and the school. The students had highlighted concerns around speeding traffic, road safety and pollution."

I rather fear the parish council has given up.

Personally, even though the measurements do not indicate a particular problem in Disley, I remain extremely concerned about air quality and road safety. The A6 is really not fit for its purpose. The stretch through the village is too narrow for the number and size of lorries coming through. It feels unsafe to walk along the pavements and it

	<p>is very noisy. The A6 may be part of an important route but it is not safe enough to bear a speed limit of 30mph through the village.</p> <p>I welcome those commitments in the strategy that will help road safety and hope that Cheshire East Council will still regard them as essential even where AQ measures do not indicate a particular problem</p> <ul style="list-style-type: none"> • Ensure that there is a consistent policy approach, which reduces the need to travel and rely on use of private vehicles and more specifically reduces the use of vehicles for short journeys and supports active travel. • When the opportunity arises, work with freight operators and organisations to establish appropriate freight routes, delivery routines and driver practices to minimise congestion and pollution. • Promote and support opportunities for active travel (i.e., walking and cycling) <p>My fear is that Cheshire East Council will focus too much on electrifying vehicles which may improve air quality but will give no benefits in terms of road safety. People will not travel more actively if they feel afraid for their lives.</p> <p>So, I welcome all those parts of the strategy about working with other departments and aligning objectives with other strategy/policy documents. However, it is very difficult to read into these commitments what tangible actions we will see and how soon.</p> <p>The subjects of education and awareness and communications crop up in various places. It would be good education could include material on how drivers can improve air quality simply by driving more smoothly, responsibly, considerately and at lower speeds.</p> <p>Cheshire East response:</p> <ul style="list-style-type: none"> • Noted. • The detailed Air Quality Action Plan, which links to the AQS and lists our various measures can be found on the website.
Member of the public	<p>The Air Quality Strategy is an excellent document and will have a positive impact on air quality and our general wellbeing.</p> <p>There are several sections intended to improve awareness and enforce existing regulations. Governments are too focussed on debating and creating new legislation when existing rules are adequate if properly-applied.</p>

For example, Section 4.6 and 4.7 include commitments to encourage compliance with existing legislation to control emissions due to domestic and industrial fuel usage.

Section 4.3 calls for systems to ensure that vehicles comply with emissions standards. Poor maintenance and neglect will cause a vehicle emissions to deteriorate, and it is not uncommon for motorists to modify their vehicles to improve performance or make them louder and this often results in worse emissions. Could the Strategy explicitly include measures to discourage cars from using our roads if they have modifications, such as removing catalytic converters, that cause them to emit more pollutants? No new rules are required. It is illegal to modify a car so that it pollutes more, but many people do it.

Enforcing restrictions intended to keep through traffic away from local roads would have a major impact – traffic waiting to turn and merge from rat runs slows down the overall flow and increases traffic on minor roads. There are many examples in Macclesfield and the Council has been struggling to work out what to do for some years:

<https://www.ilovemacc.com/2015/08/23/7432-2/>

Using of these rat-runs may shave valuable time from individual journeys, but overall the traffic is slower and emits more pollutants.

The example of [REDACTED] which causes a tailback along [REDACTED] that clearly contributes to pollution at the [REDACTED] junction which is reportedly among the worst in the region:

As well as taking air quality into account when planning new roads, the Strategy should contain measures to enforce restrictions with an environmental impact, and to consider the environment when revising restrictions on the existing network.

The environmental impact of vehicles is not just what comes out of the exhaust. The Strategy should recognise that road and tyre wear have an environmental impact, and include measures to discourage driving behaviour likely to damage our minor roads.

At certain times I have noticed that [REDACTED]

[REDACTED]. Modern devices take traffic levels into account and calculate the best route for each user in real time. Although the route along the local roads is faster, and may even be shorter than the dualled road, the stop/start nature of the drive undoubtedly means more emissions from each car taking the minor route.

	<p>The Strategy could include measures to identify and address this issue which may be as simple as enforcing existing speed restrictions along these routes.</p> <p>Reference: https://www.theguardian.com/politics/2024/jan/14/satnavs-and-google-maps-to-be-updated-in-readiness-for-driverless-cars</p> <p>SatNav operators should be discouraged from directing through traffic along local routes. This may not currently be possible, but change would come if a council's strategy was to press for beneficial change.</p> <p>I'm well aware of the 'war on motorist' headlines and well-resourced pressure groups that make traffic calming measures controversial. We rely on our leaders to give motorists' concerns the respect they deserve, but not to be deterred from making decisions that benefit us all. We are all pedestrians when we get out of our cars, and we all breathe the same air as one another.</p> <p>Cheshire East response:</p> <ul style="list-style-type: none"> • Noted.
Member of the public	<p>I hope CEC adheres to this strategy. Policy areas should not just be influenced by the strategy. Ignoring air quality assessments/data and proceeding should not be allowed. Air Quality decisions, within all policy areas, should be available to the public, including the review / decision on air quality assessments submitted with planning applications, by highways, transport etc.</p> <p>To date air quality has not been seen to be important by CEC. Public transport and school buses cut. Over developments. Insufficient review by highways to assess the impact on traffic flow on proposed planning applications. Development on the [REDACTED] a perfect example. Loss of green spaces throughout the Borough.</p> <p>The link between the air quality strategy and all policy areas needs to be strong to make any difference.</p> <p>Cheshire East response:</p> <ul style="list-style-type: none"> • Noted and all our reviews and comments on air quality assessments submitted with planning applications can be viewed online under the relevant application.
Member of the public	<p>In relation to the above Consultation, I would just like to say that I agree wholeheartedly with the response given by [REDACTED].</p>

	<p>[REDACTED] which is the main road through the town, in a building [REDACTED]. The experienced traffic air and noise pollution resulting from the high traffic levels is exacerbated by the proximity of the traffic from this residential road's housing. Such that windows can rarely be opened if at all. This should be considered when measuring and evaluating air quality in old towns such as Bollington.</p> <p>Cheshire East response:</p> <ul style="list-style-type: none"> • Noted
Sandbach Town Council	<p>Sandbach Town Council welcomes Cheshire East restating its statutory obligations and objectives; with the following comments.</p> <p>The policy notes vehicles are a significant impact on air quality in Cheshire East but does not specify focus on considerations on air quality in Cheshire East's obvious heavy traffic locations and its M6 corridor; and uniquely to Sandbach areas where substantial residential areas sit right next to the M6 and our town which is intersected by busy roads passing through residential areas.</p> <p>The council policy omits to commit specifically how air quality policy will offer any support to a targeted strategy to reduce or limit traffic pollution by means of speed limits or weight limits to reduce or limit the source of NO₂ and CO₂ and particulate from cars in areas suffering deterioration in air quality that does not breach national guidance.</p> <p>As current CE strategy seems not to consider this at all we welcome the proposal to 'Promote greater consistency across a range of policy areas for the achievement of improved local air quality, including Spatial Planning, Development Management, Highways and Strategic Infrastructure', and note that to date Highways and Strategic Infrastructure has regrettably failed to be very visible in revisiting past decisions in respect of air quality where it has been obviously deteriorating but does not breach a national limit. Reductions in air quality does potentially impact wellbeing policies of the council.</p> <p>We believe Cheshire East Departments have apparently taken a view that national limits are available headroom that allow emissions increase and therefore improvement is not required if these are not breached. We refer specifically to Middlewich Road (station 283) and Old Mill Road (unmonitored) where developments and future developments are and will increase traffic with continuing reductions in air quality and vehicle pollution.</p> <p>We hope you will consider these points and move the policy beyond statutory Air Quality requirements but proactively managing predictable consequential air quality deteriorations as a means to achieve not only a healthier living environment but a contribution to local and national Net zero goals.</p> <p>As a council we are happy to offer any help and support to Cheshire East we can in improving Air Quality.</p> <p>Cheshire East response:</p> <ul style="list-style-type: none"> • Noted.

	<ul style="list-style-type: none"> • The detailed Air Quality Action Plan, which links to the AQS and lists our various measures can be found on the website. • More than happy to work together to improve air quality and would welcome the opportunity.
Member of the public	<p>I think the current Air Quality Strategy is very woolly at best. It's a strategy to move pollution around to different places and not reducing pollution.</p> <p>I would like to see the following in the strategy:</p> <ol style="list-style-type: none"> 1. Lower the speed limit to 20mph in urban areas. <i>(This will remove huge amounts of pollution from accelerating and braking vehicles. There is a huge difference in pollution levels when accelerating from stationary to 20mph and stationary to 30mph. https://futuretransport.info/wp-content/uploads/2022/05/Urban-Transport-Modelling-2022-05-16.pdf)</i> 2. Create Ultra Low Emission Zones. <i>(it is really unacceptable that people should be poisoned by motor-vehicle pollution while they sit in their own homes.)</i> 3. Take into account the PMs produced by motor vehicle brakes and tyres. 4. Take a more scientific approach to measuring pollution. Publish the method and results - including time of day and weather conditions. <i>(Much of previous plan states effects hard to quantify. No point having a strategy or a plan if not prepared to measure outcomes.)</i> <p>Cheshire East response:</p> <ul style="list-style-type: none"> • The Annual Status Report is the document we produce each year which advises on the current monitoring and provides updates on the measures in the Air Quality Action Plan and the work undertaken by the team. This has to be submitted to and approved by Defra. • Cheshire East does have a Speed Management Strategy in place, which considers air quality. • Wording tweaked in the AQS.
Member of the public	<p>Thank you for this consultation opportunity.</p> <p>First I'm glad to see that the strategy clearly states the health implications of poor air quality and that Cheshire East is working to improve the situation.</p> <p>Presumably this strategy review is informed by the outcomes of the previous action plan, so think that the link should be included: https://www.cheshireeast.gov.uk/pdf/environment/air-quality/aqap-final-aug-2021.pdf</p> <p>The above document includes actions where the impact is deemed difficult to quantify. This highlights the lack of measurable outcomes, which needs addressing for the next period. More frequent monitoring of air quality at specific times to provide comparative data is needed. Annual monitoring cannot give a comprehensive picture</p>

since air quality varies with time of day, a work day or weekend, and weather conditions. Monitoring should surely take place at times of expected poor quality for worst case scenario, and data collected should be analysed for statistically significant differences. Note that just stating that emissions of something 'are lower' is not a scientific or useful comparison or outcome.

The strategy should be more specific about when and where monitoring of air quality takes place in the case of 'random' locations. These should be randomly chosen from urban streets with high traffic volumes. Truly random locations could be in the middle of nowhere and not meaningful so giving atypical results.

Since so many outcomes of the action plan were difficult to quantify, a more successful measurement could be to assess road use. Automatic vehicle counters at pollution hotspots could assess vehicle numbers and possibly other users (pedestrians, those on cycles, motorbikes). As you state, road transport is responsible for many emissions, and not just from exhaust but tyre wear and braking, so vehicle numbers will give a broad indication of pollution levels and hence measure reductions in traffic (which is the main way to reduce pollutants).

I am concerned that there is little in the strategy regarding fine particulates, which are dangerous for all. I would like the strategy to address this specifically. The strategy is somewhat reliant on electric vehicle uptake to reduce NOx emissions, but this will have no effect on particulates from tyres and braking. However lower speeds of all vehicles can reduce pollutants from tyre/brake use and also from combustion engines. Lower speed limits result in calmer driving styles, with less hard braking and harsh acceleration. There has been a recent study of real world emissions, rather than laboratory calculations, that shows how 20mph reduces pollution (<https://futuretransport.info/wp-content/uploads/2022/05/Urban-Transport-Modelling-2022-05-16.pdf>).

Therefore I would like the strategy to include default 20mph for urban streets to reduce pollution and make streets more pleasant and safer to live or work on, and use by all. This will naturally lead to more people walking and cycling, which will take cars off the road and enable buses to run on time. Thus fulfilling the 'encouraging active travel' aim in a concrete way. Active travellers, including children, are the most exposed to poor air and need protecting.

There is no mention of specifically reducing traffic levels overall or reducing private car dependency. CE cannot continue to cater for increased journeys and road use by adjusting and adding to the road network to move the problem around. More restrictions are needed eg with 'access only' streets to prevent rat runs. And more viable alternatives in the form of bus services, and appealing routes for walking and cycling.

	<p>I would also like the strategy to include the problem of wood burning stoves emitting particulates. These stoves are increasingly popular, driven by fashion and recent high gas/electric prices.</p> <p>The strategy does not mention the high levels of non-compliance re car exhausts in between MOT tests. The strategy could include working with the police to crack down on these illegal modifications and the garages that are involved.</p> <p>Finally, the awareness raising strategy is not ambitious enough. For example, a target of 5 sessions pa will take many years to reach even a small proportion of the population. 5 sessions per month would be more realistic.</p> <p>Cheshire East response:</p> <ul style="list-style-type: none"> • The AQS is separate to the Air Quality Action Plan and the Annual Status Report is the document we produce each year which advises on the current monitoring and provides updates on the measures in the Air Quality Action Plan and the work undertaken by the team. This has to be submitted to and approved by Defra. • Cheshire East does have a Speed Management Strategy in place, which considers air quality. • Wood burning stoves are covered in section 4.6. • Wording tweaked in the AQS.
Bollington Town Council	<p>The Air Quality strategy is along the right lines, however with the exception of CEC direct actions, the Strategy is too general and non-specific with respect to actions proposed.</p> <p>It is clear from both this Strategy document and the Carbon Neutral plans that road transport has a massive impact on air quality.</p> <p>Given that the uptake of e-vehicles is not as fast as would be hoped, then further specific actions are required to improve air quality in built up areas.</p> <p>CEC should rapidly adopt '20 is Plenty' across all built-up areas up in Cheshire East, and remove the bureaucratic and cost hurdles that stand in its way. We need for our roads to become more friendly for active travel. A combination of '20 is plenty', improved cycleways, and reliable public transport is necessary to improve air quality during the transition to e-vehicles.</p> <p>The recent Neighbourhood Plan survey in Bollington showed that 70% of responders were supportive of '20 is plenty'.</p> <p>We urge you to seriously consider our feedback and modify the Strategy Document accordingly.</p> <p>Cheshire East response:</p> <ul style="list-style-type: none"> • The detail and actions around air quality can be found in Air Quality Action Plan, which links to the AQS and can be found on the website.

	<ul style="list-style-type: none"> Cheshire East does have a Speed Management Strategy in place, which considers air quality.
Poynton Town Council	<p>Poynton Town Council broadly welcomes the revised Strategy but is concerned that Cheshire East are currently pursuing numerous policies that will have the direct effect of increasing road traffic and so damaging air quality. If they wish to protect air quality, these policies should be withdrawn.</p> <ul style="list-style-type: none"> The imminent closure of the Household Waste and Recycling Centres at Poynton, Bollington and Middlewich. Residents of Poynton, Adlington, Disley, Bollington, Prestbury, Pott Shrigley, Mottram St Andrew, Handforth and Wilmslow will have to take their waste to the remaining site on the Moss, south of Macclesfield. A journey to the Macclesfield HWRC site from anywhere in the Poynton area means a return journey that is 13 miles longer. On current usage figures that would mean an extra 226,000 miles driven on tip journeys from Poynton (closing Bollington would add about another 100,000 miles). Using an average of 40 m.p.g. this equates to over 5,700 gallons of petrol or diesel used in a year. The policy of running down and threatened future closure of Poynton Leisure Centre. There are no alternative facilities in Poynton, residents will be expected to travel to leisure facilities in Macclesfield, Bollington or Stockport. The policy of building new housing estates in the Green Belt on the edge of towns, long distances from shops and other facilities. Again, there is no real alternative to the private car for residents. <p>Measuring Air Quality</p> <p>A further concern is how exactly Cheshire East plan to measure air quality. Dangerous pollutants include nitrogen oxides (NO₂) and particulate matter (PM). The draft Policy states in Section 5.1:</p> <p><i>“Cheshire East has a network of NO2 monitoring sites and a RTA [Real-Time Analyser] located at Disley. The RTA measures NO2 and PM. The measurements obtained will be used to directly report on trends in air pollution concentrations. The measurements will provide a long-term indication of overall air quality across Cheshire East and will help to identify areas which maybe exceeding the objectives.”</i></p> <p>However, Cheshire East maintain only one diffusion tube in the whole of Poynton. The policy implies that a single machine in Disley provides the Particulate Matter data for the whole of Cheshire East. This seems wholly inadequate – one diffusion tube in a small town like Poynton provides little coverage across a small town, and Disley is one site in the far north-east of Cheshire East. PM readings there can hardly be applied, for example, to Crewe, which is over thirty miles away.</p> <p>There are also other dangerous pollutants, such as sulphur dioxide, ozone, benzene, lead and butadiene. If Cheshire East do not monitor them, how do they know these are not at dangerous levels?</p>

The provision of diffusion tubes, with only one in Poynton, plus a single particulate matter measuring device across the whole of Cheshire East, and no monitoring of other dangerous pollutants, raises concerns that air monitoring data may be inadequate and lead to complacency and under reporting of pollution.

Cheshire East response:

- The location of monitoring is reviewed every year and try ensure we have reasonable coverage of the borough. There have been more diffusion tubes in Poynton in the past, but these were removed due to showing good compliance with the air quality objective. We follow Defra Technical Guidance and our own monitoring procedure.
- The [Annual Status Report](#) is the document we produce each year which advises on the current monitoring and this has to be submitted to and approved by Defra.
- Defra have advised that in recognition of the fact that all of the objectives for Benzene, 1,3-Butadiene, Carbon Monoxide and Lead have been met for several years and are well below objective values, local authorities do not have to report on these pollutants unless local circumstances indicate otherwise.