



The countryside charity
Cheshire

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August 27th, 2024

Dear Sir or Madam,

ENGAGEMENT BY CHESHIRE WEST AND CHESTER ON ITS CLIMATE EMERGENCY RESPONSE PLAN

CPRE (formerly the Campaign to Protect Rural England) believes that the climate emergency is the biggest threat facing the countryside and the planet and that there is an urgent need to drastically reduce greenhouse gas emissions. This view would seem to concur with that of Cheshire West and Chester Council (CW&C) – whose emissions have fallen according to recent government statistics (see under ‘Business and Industry’). That said, CW&C still has some way to go to achieve its climate goals.

In order for Cheshire CPRE to feel sufficiently informed to take part in this engagement process about CW&C’s new Climate Emergency Response Plan, we felt it was necessary to understand how the local authority have been performing in addressing climate change. In the absence of much local level information, we have considered the results of the survey conducted last year by Climate Emergency UK (<https://climateemergency.uk/about-us-2/>) of all local authorities in England, Scotland and Wales.

Using climate action scorecards which posed 91 questions, Climate Emergency UK measured actual completed actions towards net zero in respect of seven themes between January 2019 and March 2023. Information on the councils’ performances was gathered from publicly available material, including the Climate Action Plans, national data and more than 4,000 Environmental Information Regulations requests. This research exercise, which lasted nine months, produced percentage rankings for each theme and also overall rankings. Ultimately only 41 councils in the UK scored over 50% for their climate action, the average score being 32%. CW&C’s overall score was 37%.

We trust that the findings were a wake-up call for the vast majority of Councils and a salutary message to CW&C and many others to dramatically up their game. (That point made, CW&C performed better than Cheshire East Council which scored 33% overall).

On the seven themes, CW&C scored a remarkable 76% for Collaboration and Engagement (against an average of 53%) but a derisory 14% for Transport (against an average of 22%). Other CW&C scores were 47% for Building and Heating (against a 49% average), 33% for Planning and Land Use (against an average of 35%), 28% for Government and Finance (against a 27% average), 31% for Biodiversity (against an average of 27%) and 48% for Waste Reduction and Food (which was the average score for this theme). The key point to make is that the averages in most cases were appallingly low. We sincerely hope that the repeat of this exercise – which will take place next year using an updated methodology – will produce more edifying results. This will look at the time frame of January 2020 to October 2024. The vast majority of questions will remain the same but there will be four new ones.

Of the six themes chosen by CW&C for exploration as part of this exercise, three of them match exactly or very closely with those identified by Climate Emergency UK – ‘Transport’, ‘Housing’ and ‘Waste, Recycling and the Circular Economy’. ‘Energy’, picked out by CW&C, is relevant to at least two of the themes analysed by Climate Emergency – ‘Heating’ and ‘Land Use’ but Climate Emergency did not focus on ‘Business and Industry’ as CW&C did. On the other hand, CW&C did not identify ‘Biodiversity’ as a stand-alone theme as Climate Emergency UK did, but we recognise it is well covered by their (unusual) approach to ‘Land Use, Adaptation and Repair’. (See our comments under this section heading).

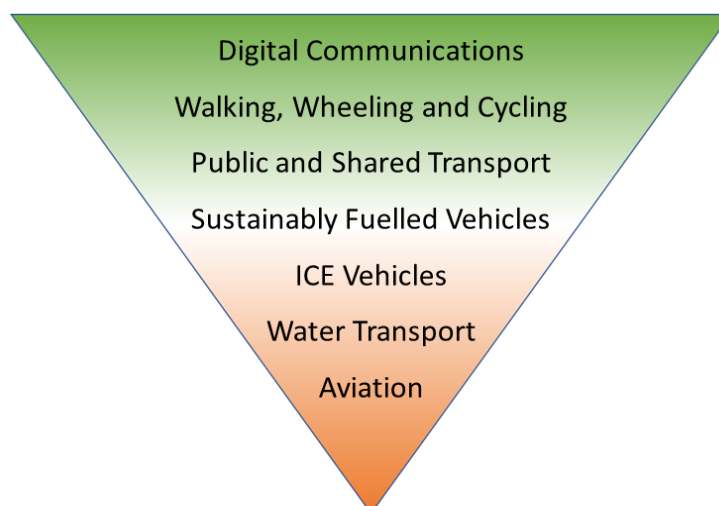
Here are our comments under CW&C’s identified theme headings:-

Transport

In tweaking their questions for next year’s survey exercise, Climate Emergency UK have recognised that two of their original questions, which focused on clean air/low emission zones, resulted in unfair penalties last year for rural authorities that were unlikely to introduce such measures. However, this would only have been one factor in CW&C being awarded such a low rating. It clearly needs to make much more stringent efforts to address this theme and bring down its transport-related emissions.

We can see, in the extant Climate Emergency Response Plan (para. 5.7), that CW&C recognise the importance of using technology to avoid making unnecessary journeys and we commend their suggestions for more sustainable travel. We recommend to CW&C that, in the first instance, they consider adopting CPRE’s sustainable transport hierarchy. It is based on that of the Energy Savings Trust (EST), although ours includes ‘Water Transport’, which is not covered by the EST.

Sustainable Transport Hierarchy



NB ‘ICE’ vehicles are those powered by an Internal Combustion Engine

‘Digital Communications’ is pre-eminent in the EST and the CPRE sustainable transport hierarchies due to the fact it reduces the need to travel. ‘Aviation’ ranks last because it is the least sustainable transport mode. The full rationale for the hierarchy is explained in CPRE’s national transport policy and in its background evidence document, available here: <https://www.cpre.org.uk/resources/cpre-transport-policy/>. However, it is important to note that all CPRE policies are influenced by the need to tackle the climate emergency. Our climate emergency policy and supporting topic papers are here: <https://www.cpre.org.uk/resources/cpre-climate-emergency-policy-and-supporting-topic-papers/>.

We are informed that the original Climate Emergency Response Plan was authored by a former CW&C chief executive. Presumably, much of it was written before the Covid pandemic lockdowns. This is relevant because, as a result of that experience, home working has become much more commonplace and this has affected commuter patterns. Similarly, changing attendance patterns in relation to schooling – with pre-school breakfast clubs and more after school activities – has also affected what was previously regarded as ‘peak time’ demands. Future transport planning needs to take these lifestyle changes into account and not continue to plan to meet expected ‘peak demands’ on transport infrastructure. It is simply not sustainable to keep providing more highway capacity which merely results in more traffic movements and repetitive calls for yet more highway capacity. The emphasis must be on sustainable transport modes.

In addition, to these points on the Response Plan, we would like to draw attention to the submission we made for the consultation on CW&C’s Local Transport Plan in January. It highlighted the effects of transport on climate change: <https://www.cprecheshire.org.uk/news/response-to-cwc-ltp4/>.

Housing

The current CW&C Climate Emergency Response Plan recognises that residential property makes up a substantial proportion of CW&C’s greenhouse gas emissions (para. 6.1).

Climate Emergency UK intend to add a sub question to their survey next year asking councils if they have a costed plan to retrofit all their estate/significant buildings and what the target date is for getting this work completed. (This will sit alongside a question asking if councils have a costed plan to retrofit all council/social housing that they directly own or manage. However, this will only apply to councils that own more than 100 homes).

It is a sound idea to have a costed retrofitting plan but we cannot tell whether or not CW&C has one. The existing Climate Emergency Response Plan provides us with a list of interventions that were recommended by consultants Anthesis (para. 6.1) but there is no obvious way of assessing what if any progress has been made on them. Our attempts to look up recent meetings of the CW&C Climate Emergency Task Force on the council’s website were met with the message “No documents available for this meeting” for two meetings held in January and May this year. The lack of documents in this part of the Council’s website has made it near impossible to ascertain how much progress the Council has been making on climate action – hence our reliance on the Climate Emergency UK assessment.

As far as climate-proofing of new homes is concerned, the existing Response Plan informs us that “Officers highlighted the opportunity for the Council to deliver high standards in its own housing delivery” (para. 6.2). It discussed the value of setting higher standards for all housing and resolved to “explore options for ensuring that new development should comply with the UN Sustainability Targets and the Anthesis targets” (para. 6.5). However, here again, there is no apparently easy way of knowing what progress has been made on this and other commitments in the current Plan.

CW&C are currently at the early stages of preparing a new Local Plan. It would be an ideal opportunity to set high environmental requirements for future new developments – and it is going to be more important than ever that they are achieved in view of the fact that the government’s new standard method for calculating housing numbers (as set out in its [consultation on proposed changes to the planning system](#), 30 July 2024) requires CW&C to increase its housing provision from 532 p.a. to 2,017 p.a. – a 279% increase.

Very oddly, the CW&C Response Plan incorporates commercial and non-domestic buildings under the heading of ‘Housing’. See our comments on this in the section on ‘Land Use’.

Land Use, Adaptation, Climate Repair

'Land use' in relation to policy documents is normally assumed to be about spatial planning – the sort of planning covered by Local Plans and Neighbourhood Plans. Strangely, however, in this document, the phrase is used to cover the descriptions of habitats, farming, woodland and land management. The Local Plan is only mentioned to point up the fact that it calls for 'positive adaptation to climate change'. This is very confusing. It would be much more apposite to cover these matters either just under a heading of 'Biodiversity' or perhaps 'Natural Capital and Biodiversity'.

We note, incidentally, that Climate Emergency UK intend to add a new question under their 'Biodiversity' heading in order to ascertain whether or not councils have introduced a Green Space Factor (GSF) in order to increase habitat in new developments. (GSF, also known as the Urban Greening Factor, is a planning policy that sets a target score for the proportion of green infrastructure within a development site). We hope that the inclusion in the Climate Emergency survey of a question about this will prompt councils to adopt such targets.

The 'Land Use' heading in the Climate Emergency Response Plan should be retained but, as is more customary, it should relate to how land is allocated – whether that be for development purposes or designated open spaces or whatever and it should be cross-referenced to the Local Plan. In other words, commercial and non-domestic buildings (currently appearing under 'Housing') should be in this section, as should industrial land allocations – and, as with the Local Plan, this section should include air quality. It should also cover carbon capture and there should be an explanation as to why building on brownfield land as a first option is more sustainable than greenfield development.

CPRE, along with a number of other environmental NGOs, are strongly of the opinion that there needs to be a national land use strategy and have lobbied for one for some time. More recently, CPRE have also been calling for a national transport strategy to sit alongside a Land Use one.

Business and Industry

CW&C are unusual in declaring that emissions from industry are the largest component of the borough's overall emissions. Elsewhere, it is normally transport. Nationally, transport (when including aviation and shipping) makes up a third of all emissions. However, it was encouraging to discover, from data published by the Department for Energy Security and Net Zero (DESNZ) in June, that there was a national fall in carbon emissions in 2022 (<https://www.gov.uk/government/statistics/final-uk-greenhouse-gas-emissions-national-statistics-1990-to-2022>) and also a local drop (<https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-statistics-2005-to-2022>). We note that GHG emissions in the borough stood at 4.021 tonnes in 2021 but had reduced to 3.201 million tonnes in 2022. (A drop of 20.4%). Hopefully, with continued efforts across the board, this very promising trend will continue.

Energy

Under this heading, CPRE would like to draw CW&C's attention to our rooftop solar campaign: <https://www.cpre.org.uk/what-we-care-about/climate-change-and-energy/renewable-energy/>. We oppose solar and wind farms on agricultural/grazing land but support solar on rooftops and off-shore wind and tidal energy generation. We are in favour of heat pumps but recognise that the cost issue needs to be resolved. We do not support fracking which contributes to climate change and is a big threat to the countryside. It has no place in a zero carbon future. Shale gas extraction cause air and sound pollution and the toxic chemicals used to frack can leech into waterways and harm wildlife. Drilling to extract even more polluting fossil fuels is not the solution to the energy crisis.

Waste, recycling and the circular economy

The extant Climate Emergency Response Plan tells us that the Council has already had notable success in waste reduction. Has this continued, we wonder, because the latest national figures from DEFRA show that the 'waste from households' recycling rate was 43.4% in 2022 – down 0.7 percentage points from 44.1% in 2021. The amount of residual waste treated was down (12.1 million tonnes in 2022 from 12.9 in 2021) and the total amount of waste recycled decreased (9.3 million tonnes in 2022 compared to 10.2 in 2021). In the North West, the local authority with the best recycling rate was Stockport MBC with 59.3%. Liverpool was the worst performing authority in the North West and the second worst in the country at 17.9%, with only Tower Hamlets worse at 17.7%

<https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results/local-authority-collected-waste-management-annual-results-202223>).

CW&C committed to producing a waste management strategy but, whilst there is a cabinet report on the CW&C website from July 2021 agreeing certain actions, including 'exploring' alternative fuel vehicles, the actual strategy does not appear to be there. Also, the Response Plan mentions the intention to reduce emissions from its waste vehicles by procuring "the most efficient and environmentally friendly fleet possible, including exploring purchasing electric or hydrogen vehicles". This as well as determining to explore the creation of a community-led award scheme for sustainable businesses" (para. 9.5) and to reduce food waste in schools (par. 9.2). Did CW&C achieve these things?

Throughout the Response Plan, there are any number of good intentions and ideas, but it is difficult or impossible to discern how many have been acted upon and how successful they have been. The website could be much more informative.

Useful and imaginative recycling ideas abound. Does the Council keep itself appraised of these?

Hopefully our comments and input to the Climate Emergency Response Plan engagement have been of some value.

Yours faithfully,

LILLIAN BURNS

For CPRE Cheshire Branch