creating a better place

Environment Agency

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LOCAL PLAN SCOPING CONSULTATION

Thank you for consulting the Environment Agency with the Cheshire East Local Plan Scoping Consultation, which we recognise as an early public consultation to what will be the Cheshire East Local Plan.

Environment Agency comments

In line with the Environment Agency EA2030[1] strategy and the Strategic Policy Statement for the Environment Agency[2], we welcome and support local plans that focus on achieving "sustainable growth" by balancing economic development with environmental protection and climate resilience

Our initial reaction would be the scoping consultation is brief and lacks sufficient information and detail to inform the proposed strategic thinking the Council is at this stage considering. However, we do recognise this is an early public consultation and the plan making process will foster proactive participation, which we welcome.

2. New Local Plan

Paragraph 2.1 For the avoidance of doubt, local plans can (and should) contribute to the protection and enhancement of our natural environment, promote and ensure the sustainable

[1] Environment Agency: EA2030 change for a better environment - GOV.UK
[2] Strategic Policy Statement for the Environment Agency - GOV.UK

use of our natural resources and promote a truly integrated approach to sustainable water management (collaborated approach to managing the water cycle rather than considering them as individual problems).

3. Context for the new local plan

Increase in housing requirements

Paragraph 3.3 – 3.7 We are aware of the introduction of a standardised way of calculating local housing need. In the case of Cheshire East, this will create overall higher building volumes which if planned inappropriately can lead to increased pressure on our natural environment. However, if planned appropriately can provide opportunities for strategic environmental protection, enhancement and/or mitigation.

4. Baseline information and spatial portrait

Heritage, culture and natural environment

Paragraph 4.11 – 4.16 To clarify there are a number of important watercourses throughout the borough which provide a multitude of uses, including those relating to the Dane, Bollin and Weaver catchments. There are also a number of meres, lakes and reservoirs. These all contribute to the overall environmental value and importance of the borough.

5. Scope of the new local plan

Creating a vision and objectives

Paragraphs 5.2 – 5.4 In terms of priority matters for inclusion within the plan, we advocate the plan is strongly aligned with our own long-term strategic goals:

1. **Healthier air, land and water supporting nature's recovery**. Reversing nature's decline and supporting recovery.
2. **Sustainable growth**. Balancing development needs, such as housing and infrastructure, within environmental limits.
3. **A nation (or borough) resilient to climate change**. Preparing the nation (or borough) for extreme weather, flooding, and droughts while moving toward net-zero targets

Planning for Growth

Paragraph 5.5 – 5.7 We are supportive of the need to ensure infrastructure capacity and environmental constraints are key considerations in the planning regime. The local plan should also ensure the natural environment is viewed not only as a constraint but as an opportunity, creating an almost symbiotic relationship between environmental enhancement and protection, and growth and development. Growth and development can deliver habitat improvements providing valuable ecosystem services, including water regulation during periods of flooding and drought. Furthermore, the habitat creation ambitions identified within the Cheshire and Warrington Local Nature Recovery Strategy, which have the potential to deliver Biodiversity Net Gain efficiently at a landscape scale, should be recognised as an opportunity to facilitate adjacent development on land of lower ecological value.

Paragraph 5.6 This paragraph explains future housing need and the overall level of development will be informed by evidence. Yet this appears to conflict with earlier parts of the consultation, which indicate the standardised method should be the principal basis for determining future housing needs.

Minerals

Paragraph 5.13. What is considered 'later stages of the plan making process'? If it is meant towards a Regulation 27 consultation prior to Gateway 3, arguably this will not allow sufficient time to fully consider hydrological (and geohydrology) concerns to establish if allocation is within environmental limits. We suggest initial site assessments and potential allocation options are considered and published earlier than later stages of making the plan.

In terms of 'unsuitable', early explanation of the suitability criteria, thresholds and weighting versus other interests would be beneficial.

We recognise mineral extraction can provide significant opportunities for landscape-scale environmental enhancement following restoration. Given the often-extensive scale of mineral allocations, restoration proposals should incorporate ambitious habitat creation and enhancement measures both within the quarry footprint and across the surrounding landscape, rather than being limited solely to areas directly affected by extraction activities. Particular attention however, should be given to the wider geohydrological impacts that mineral workings and restoration can have, including potential effects on groundwater and surface water levels, as well as the protected rights of water abstraction licence holders.

Waste

Paragraph 5.13 What is considered later stages of the plan making process? If it is meant towards a Regulation 27 consultation prior to Gateway 3, arguably this will not allow sufficient time to fully consider waste needs within the borough or site availability and deliverability which could be constrained by the natural environment, various designations or other land uses. Furthermore the identification of new waste management facilities or the extension of existing facilities in close proximity to built-up areas, can often give rise to amenity issues and nuisance complaints, which can be difficult to mitigate or resolve once operations are established. Meanwhile, residential or other allocations located in close proximity to existing waste management facilities may require substantial mitigation measures to address potential impacts, rather than relying on operators of those facilities to significantly modify established activities.

Green Belt

Paragraphs 5.15 – 5.18 At times, Green Belt designations have unintentionally provided protections and environmental benefits that sit outside the primary purpose of Green Belt policy. For example, Drinking Water Safeguard Zones, for both groundwater and surface water, occur within parts of the borough and identify catchment areas at risk of failing water quality standards. Retention of undeveloped land can help limit runoff, reduce pressures on wastewater infrastructure and support natural flood management processes. Green Belt areas contribute to carbon sequestration and help moderate ambient temperatures around urban settlements. They often support interconnected habitat mosaics and ecological corridors, providing a foundation for biodiversity protection, enhancement and wider nature recovery initiatives.

Therefore, when considering releasing land from Green Belt designation it might be prudent to consider the sustainability of the land use in the assessment process and how this can be avoided, mitigated or compensated for well in advance.

Spatial distribution

Paragraph 5.25 Under Landscape Character we assume ‘blue infrastructure’ is included under the consideration of ‘Green Infrastructure’.

Paragraph 5.26 We appreciate and acknowledge the council must consider a wider range of options in terms of the distribution of development. New settlements and large-scale urban extensions can place significant pressure on the natural environment. The council should be mindful of environmental concerns when developing options to take forward in this regard. For example, some geographical areas should be avoided so not to exacerbate the risk of flooding now and in the future, safeguard finite natural resource sources (including water) and safeguard other sensitive natural environments and biodiversity.

Water efficiency standards

Paragraphs 5.54 – 5.56 We welcome it has been identified local plans can require an optional standard of 110 litres per person per day over the mandatory building regulations standard of 125 litres per day per person. Following two successive years resulting in periods of prolonged dry weather in 2025 and 2026, we suggest the optional standard is adopted. It should be recognised periods of dry weather such as those recently experienced, not only leads to a reduction of water availability for our needs but leads to low river flows and water levels causing stress on aquatic life.

It should be noted several surface and groundwater sources across the borough are already under pressure from abstraction, and future housing, novel technologies, industry and other growth types is likely to place additional demands on water availability.

Other housing policies

Paragraphs 5.63 – 5.64 The local plan could also consider urban cooling measures in any new proposals to combat the increased likelihood of heatwaves. For example, any greenspace planting should consider including more drought resilient species to reduce the need for watering maintenance of these areas.

Minerals

Paragraphs 5.76 – 5.83 We agree with nation policy new peat extraction allocations should not be explored and suggest this applies to the expansion of existing sites beyond existing permissions. Peatland provides terrestrial carbon storage and provides water regulation in the event of flooding and drought, therefore meaning it is important to protect and improve it.

Waste

Paragraphs 5.84 – 5.90 Some key considerations with regards to the management of waste and waste site allocation(s) that should be considered.

- Support safeguarding existing and permitted waste management infrastructure.
- Prioritise waste prevention, reuse, recycling and circular economy measures.
- Address the identified residual waste treatment capacity gap through a robust evidence-led strategy.
- Generally support facilities for food waste processing, anaerobic digestion and resource recovery.
- Prioritise appropriate brownfield and existing employment sites for waste development.
- Ensure waste policies contribute to climate neutrality objectives and environmental protection and enhancement.
- Maintain effective cross-boundary collaboration regarding residual waste treatment capacity and strategic waste infrastructure.
- Update the Waste Needs Assessment to reflect legislative reforms and the plan period to 2045 incorporating the now standardised way of calculating local housing need.

Transport and infrastructure

Paragraph 5.92 For the avoidance of doubt, we assume 'blue infrastructure' is included under the consideration of 'Green Infrastructure'.

Natural Environment

Paragraphs 5.96 – 5.103 We are generally supportive of these paragraphs; however, we would have appreciated more focus on our water environment including the requirements of the Water Framework Directive to improve our numerous waterbodies. It is important future growth not only avoids deterioration but actively contributes to improving water quality, achieving Water Framework Directives objectives, and enhancing overall waterbody catchment health.

For the avoidance of doubt, paragraphs 5.99 and 5.100 we assume 'blue infrastructure' is included under the consideration of 'Green Infrastructure'.

Paragraph 5.103 We concur the existing Cheshire East Strategic Flood Risk Assessment be reviewed and where required refreshed to support the evidence base. It should evaluate all

sources of flood risk and be informed using relevant policies using the most up to date and relevant data. It should provide an evidence base to steer development away from high-risk sites, ensuring flood risk is not increased now and, in the future, taking in to account the impacts of climate change.

The Strategic Flood Risk Assessment should identify opportunities to reduce flood risk and improve flood resilience. This includes recommending appropriate mitigation measures, highlighting opportunities for natural flood management, identifying areas suitable for flood water storage, and safeguarding land that may be required for future flood defence infrastructure.

Only once the Level 1 Strategic Flood Risk Assessment has been reviewed / updated or replaced, should a Level 2 Strategic Flood Risk Assessment be prepared to fill evidence gaps, inform allocations with hazard maps and mitigation recommendations and identify flood management opportunities.

It should be noted the Environment Agency Flood Map for Planning was updated March 2025 to integrate NaFRA2 modelling and again August 2025 to add flood zones plus a climate change layer.

Wildfires on peatland are becoming increasingly common during recent heatwaves we are experiencing, consequently any changes in land use that increase wetted peat should be encouraged and facilitated.

There should be a stronger emphasis on nature-based solutions and integrated water management in the plan. We would expect a catchment-based planning approach to ensure environmental issues are considered holistically across the wider catchment.

We believe an Integrated Water Management Plan is potentially being discussed for Crewe and although at an early stage, ultimately it should align with the local plan and the supporting evidence base and vice-versa.

Health and wellbeing

Paragraphs 5.104 – 5.108 We welcome the recognition of green spaces as a key determinant in supporting healthy, resilient communities. Access to high-quality green spaces in and around settlements should be enhanced, providing greater opportunities for people to

experience biodiverse and multifunctional environments such as wildflower meadows and aquatic habitats. Such spaces deliver both physical and psychological health benefits and, when sustainably located close to or integrated within new development, are recognised as making an important contribution to addressing environmental deprivation.

Pollution and Contamination

Paragraph 5.109 Water pollution, which can come from numerous sources, causes severe harm to our water environment impacting ecosystems, human health and our economy. Given the principal purpose of the local plan is to guide how land is used and where and how development occurs to facilitate growth, it is imperative the local plan reflects an integrated approach to sustainable water management to coordinate improvements to water quality, ensures a water supply and manages flood risk together.

Climate change & climate change adaptation

Paragraph 5.113 & 5.114 For awareness the Cheshire and Warrington Local Nature Recovery Strategy has highlighted areas where ecosystem services gains can provide the climate change resilience required.

We trust these comments prove useful. However, should you have any questions regarding our response, please contact spplanning.rfh@environment-agency.gov.uk

Yours sincerely,

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