



# Congleton Town Council

Historic Market Town

Chief Officer: David McGifford CiLCA

## RESPONSE DRAFT AIR QUALITY ACTION PLAN CONSULTATION

12<sup>th</sup> March 2021

### RESPONSE TO THE CEC DRAFT AIR QUALITY ACTION PLAN CONSULTATION DOCUMENT FROM CONGLETON TOWN COUNCIL'S COMMUNITY AND ENVIRONMENT COMMITTEE

Congleton Green Working Group has considered the Cheshire East Council's (CEC) Draft Air Quality Action Plan consultation document and is submitting the following comments. These considerations have been approved by Congleton Town Council's (CTC) Community and Environment Committee on the 11<sup>th</sup> of March 2021.

In writing our response, Congleton Town Council has also considered CTC's Strategic Objectives in its business plan, aspirations in Congleton's draft Neighbourhood Plan and local knowledge of councillors and Green Working Group members on how these relate to the general and specific actions in the consultation.

Congleton is pleased to see that over the past few years the Air Quality Annual Reports are showing continuous improvements in the town's three known Air Quality Management Action areas. However, we are concerned that these areas are only tested for nitrogen dioxide levels and would like to see the areas monitored for particulate matters as these levels do not necessary decrease in line with nitrogen dioxide levels.

The town council also questions whether averaging NOx measurements over a month gives an accurate picture and really protects the health of residents. This does not comply with WHO standards, which recommend hourly as well as yearly averages. The Town Council understand that hourly measurements are expensive, but we would like Cheshire East Council to consider some real-time measurements at least one day a month at each of the AQMA sites.

We believe testing at peak-times is particularly important for the three AQMA area where the roads are within a few feet of family homes. We are also concerned that next year monitoring of the Rood Hill AQMA area may cease due to meeting the three-year levels criteria. As it is not yet known what the impact of the Link Road, extra house building and measures to encourage through-traffic away from the town centre will have on this area, Congleton Town Council would like to see monitoring continue in the Rood Hill area even if the levels stay below 40 for the third year. Traffic patterns in Congleton are likely to change with the opening of the link road and it is important that this area is kept under review.

Where	Declared	2005	2017	2018	2019	2020
West Road	1/05/05	61	66	56	49	44
Rood Hill	1/05/05	60	47	41	38	36
Lower Heath	1/04/08	47	68	61	49	47

We are pleased that CEC is now monitoring Holmes Chapel Road (CE308) and believe it is important for Cheshire East to be proactive in this area of work; not just monitoring the known sites but checking for emissions at other potential hot spots across the borough. In Congleton we are aware of many roads where cars are often queued and where front doors are within feet of the cars. We also suggest spot checks outside schools and shopping centres at times of high pedestrian footfall mixing with parked and often idling cars.

Technology will play a big part in reducing emissions levels and so improving Air Quality and it is a reasonable assumption that there are far more low emission vehicles on the road in 2020 than in 2005. At the same time there has been an increase in the number of cars on the road and although the NOx levels may have fallen the particle levels from brakes and tyres are not necessarily decreasing – which is why we believe these levels need to be checked for the health of our residents.

WHO and EU both recommend strict limits, especially on PM2.5 DEFRA has diluted this to ‘work towards reducing emissions.’ Given the health danger to the public, we would like to see Cheshire East Council take a proactive approach to particulate monitoring and use a real-time sensor at known hot spots at peak times.

Congleton Town Council noted that the Air Quality Annual Report states that to reduce the NOx levels in Lower Heath would require a 22.23% reduction in traffic. To reduce the levels on West Road would require a 12.5% reduction in traffic. While the soon to be opened Link Road will remove some of the through traffic from these two roads, the Congleton area is increasing by almost 4,000 new houses (increasing housing stock by around a third). We cannot assume that the Link Road will solve the emission problems (Cong 1)

We are also conscious that traffic is not the only source of pollution. Some recent Air Quality monitoring carried out by the Congleton Sustainability Group found that a large proportion of particulate emissions is from house heating (coal and wood) and from industry. The action plan in the document says nothing about non-vehicular particulate emissions. We believe this is a mistake and even if Cheshire East Council has limited powers over industrial and residential emissions, the problem should not be ignored.

#### COMMENTS ON GENERAL MEASURES

The consultation document contains 22 General Actions Measures for the Cheshire East Council area. These seem reasonable and but is alarming that some of the campaigns were introduced a decade ago and suggest that more urgency is needed. Where it is possible to work in partnership the Town Council would consider helping to promote these general measures – particularly the 7 General measures below:

**GN8 School Travel Plans** – more energy is needed in this area and a more target campaign to stop mixing idling cars and young children at the start and end of the school day.

**GN9 – Encouraging Company Travel Plans** – CTC would be happy to assist CEC with this project in the Congleton Area.

**GN11 – Active Travel** – this action should also consider the role of walking and public transport. As part of Active Travel CTC is keen to see more priority crossings and safer routes to school.

**GN12 – Anti Idling** – CTC would be happy to work with CEC on promoting this message and to work with the schools (encourage CEC to get children to learn how to test as part of science lessons?)

**GN15 – Weight Restrictions on AQMA areas** – this wouldn't work for Congleton as the AQMAs are along main routes in and through the town

**GN18 – More electric charging points** – CTC would like to see the proposals for more points in Congleton. Approximately three years ago we were fighting to keep our charging points in Princess Street car park! CTC believes it is important to develop a plan for more public fast charge sites

**GN22 – Encouraging Roadside Planting** – CTC is interested in working with CEC to increase this general measure. Through Congleton in Bloom, Streetscape, Congleton Town Council and Congleton Partnership there has already been some progress. It has been an area that members of the public are keen to get involved with. We would be interested in seeing Cheshire East's Plans for Congleton and working in partnership on this general action.

Please can you supply Congleton Town Council with more information on the dismissed GN9 action on page 31 not pursuing the NOx busting paint – on hold for further research as we understood this to be used on Rood Hill wall.

## **FIVE CONGLETON SPECIFIC ACTIONS MENTIONED IN THE ACTION PLAN**

Congleton Town Council questions whether all of the five specific actions listed for Congleton are in line with other Cheshire East Council policy documents such as the Active Transport Plan Development Plan. The actions appear to have been developed with the idea of keeping vehicles moving to reduce pollution – but the actions proposed may be detrimental for walking, cycling and public transport - moving bus stops so that vehicles do not get stuck behind buses, reviewing pedestrian crossings so that vehicles do not have to stop as often, reviewing the need for lights at Rood Hill.

**Cong 1** – building the link road, to remove much of the non-local traffic from the town centre roads. Although we all hope that the Link Road has the desired effect of removing much of the through traffic along West Road, Clayton Bypass and Lower Heath, the housing built within the Link Road area is likely to create more local traffic, so the impact of this action will need to be kept under review.

**Cong 2** Review need for Traffic Signals at Rood Hill and give more priority to Rood Hill - need to also be conscious here that in another consultation the aim is to direct more traffic up Rood Hill rather than through the town centre so this needs to be taken into account with the lights, along with enabling people to physically cross the road.

**Cong 3** – Review the crossing at Lower Heath – Puffin and lights. We would be concerned about seeing any pedestrian crossings removed and believe we need MORE safe crossing points if more people are going to be persuaded to walk or cycle for local journeys. Removing the crossing could affect the walking route to school.

**Cong 4** – Review West Bound Bus Stop by Tesco express – if public transport is going to be successful the buses need to stop where people want to get on and off.

**Cong 5** – Improve Cycle network around Congleton – Congleton Town Council are in support of this.

We would welcome feedback on our comments. As a Town Council we are as concerned about the importance of good air quality for our residents and would welcome an active conversation on how we can work together to achieve this in Congleton.

Yours sincerely



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Congleton Town Council

**Sent on behalf of the Communities and Environment Committee.**



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