



Jayne Traverse  
Executive Director of Place  
Cheshire East Council

28<sup>th</sup> September 2022

Dear Jayne,

Cheshire Wildlife Trust has become aware of several communications from Cheshire East Council (CEC) concerning the South Macclesfield Development Area (SMDA) that contain apparent scientific inaccuracies and errors of fact that obfuscate the true carbon impact of the scheme. As a longstanding environmental partner of and advisor to CEC, we wish to express our concern over this matter.

To cite one example, the communication dating to 21<sup>st</sup> March 2022 to MP David Rutley from Director of Growth and Enterprise, Peter Skates contains the following statement:

*'the council is working to ensure that the method used to stabilise the ground will protect the carbon already stored in the peat and prevent, as far as possible, further leakage.'*

CEC appears to be claiming that the development of the site will prevent (to some extent) the 'leakage' (emission is the appropriate term) of the carbon stored in the ground. We believe the proposed approach to achieving this should be set out in detail by CEC as we are unaware of any such construction methods that might make this possible. Without this detail we regard such statements as misleading as they could provide false reassurance that the impact on peat arising from the proposed development can be avoided.

There is a fundamental principle that peat, once dried and exposed to the atmosphere, will oxidise and produce a range of greenhouse gases. The SMDA site is undoubtedly very wet (as evidenced in our surveys) and will presumably need to be drained to some extent to accommodate any development. The subsequent lowering of the water table will ultimately expose more peat to the atmosphere and therefore increase the overall carbon emissions of the site both during construction and operationally in a post-developed state.

We supplied an estimate for the carbon emissions of the site in developed and predeveloped state to the Leader of Cheshire East Council back in March of this year for comparative purposes. I have attached these calculations for your convenience and we would be more than happy to meet with council officers to discuss our methodology. We wish to stress that, in any developed scenario, the SMDA site will be emitting more carbon than it was prior to development, thereby exacerbating the existing carbon emissions of the site. Indeed, this is quite the opposite from the solution that CEC is claiming it to be and would take CEC further away from achieving its commitments to Net Zero.

Unless it can be robustly demonstrated, we ask that Cheshire East Council refrains from presenting the SMDA as a concept that will reduce greenhouse gas emissions from the site and amend all relevant communications to that effect. To the best of our knowledge, this is



an inaccurate claim and undermines CEC's credibility when discussing the protection of peatlands. Until CEC presents any such evidence to the contrary, it should be presumed that the SMDA will accelerate greenhouse gas emissions from the site. As the Executive Director with responsibility for the Zero Carbon plan can you provide more clarity and transparency in this matter?

Peat is a finite and irreplicable natural capital resource that if protected can contribute to the delivery of the Local Nature Recovery Strategy, achieving Net Zero and addressing the Climate Emergency declared by Cheshire East Council. Cheshire Wildlife Trust is working with the local community to create an alternative vision for the site which we will be happy to share with you once complete.

Yours sincerely,

Charlotte Harris

**Chief Executive of Cheshire Wildlife Trust**

