



Town & Country Planning Act 1990

**APPEAL
ON BEHALF OF
SATNAM MILLENNIUM LIMITED**

**IN RESPECT OF
Land at Peel Hall, Warrington**

RE-OPENED PUBLIC INQUIRY 14th September 2020

**PLANNING INSPECTORATE REF:
APP/M0655/W/17/3178530**

LOCAL AUTHORITY PLANNING APPLICATION REFERENCE: 2016/28493

REBUTTAL PROOF OF EVIDENCE

Of Miller Goodall Ltd.

AIR QUALITY

Lesley Goodall

Date: 28th August 2020

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Abbreviations

The following abbreviations are used within this rebuttal: -

ADMS-Roads	Atmospheric Dispersion Modelling System for Roads (modelling software provided by CERC Ltd)
AQMA	Air Quality Management Area
DEFRA	Department for Environment, Food and Rural Affairs
EFT	Emission Factor Toolkit (a database of vehicle emission factors produced by DEFRA for use in air quality assessments)
EIA	Environmental Impact Assessment
ES	Environmental Statement
LAQM	Local Air Quality Management
LPA	Local Planning Authority
LPCS	Local Plan Core Strategy
MGL	Miller Goodall Ltd
NO ₂	Nitrogen dioxide
NO _x	Nitrogen oxides
PM	Particulate Matter
PM ₁₀	Particles smaller than 10 micrometers in diameter
PM _{2.5}	Particles smaller than 2.5 micrometers in diameter
µg/m ³	Micrograms per cubic metre
WBC	Warrington Borough Council

1.0 Introduction

1.1 This Rebuttal Proof is a response to the Proof of Evidence of Mr Jim Sullivan for the Save Peel Hall Campaign Group (Rule 6 Party) in relation to air quality. A Statement of Common Ground for air quality has been agreed with Warrington Borough Council (WBC); both parties are agreed that there are no air quality reasons why the development should be refused planning permission subject to planning conditions.

1.2 I will comment on each paragraph of Mr Sullivan's proof where appropriate. If similar paragraphs are grouped together along a similar theme, I will make a single comment to avoid repetition.

2.0 Traffic based issues (Section 1.2a, Section 9 of Mr Sullivan's proof)

2.1 Mr Sullivan raises a number of issues regarding the traffic data used within the air quality assessment. The derivation of traffic data is outside of the scope of my expertise and Mr Tighe will deal with this.

3.0 Settings for ADMS model (section 1.2b)

3.1 Mr Sullivan asserts at section 1.2b of his proof that *"The settings for the air quality model have not been provided in sufficient detail to either verify or challenge the model"*. This is not correct.

3.2 Inputs into the ADMS model fall into the following categories;

1. Setup. This relates to the naming of the model to aid identification at a later date and a variety of settings that are not relevant to the appeal;
2. Source data. In this case, the source data relates to traffic data. This data is provided in AQ4 of Volume 9 of the ES;
3. Meteorology. An explanation of the meteorologic data used in the assessment is provided in AQ4 of Volume 9 of ES. The meteorological station used to obtain data for use in the model was Rostherne, as agreed with WBC. A series of hourly sequential data covering the period 1st October 2018 to 30th September 2019 was used;
4. Background concentrations. This part of the model was not used. As described in section 12.4.13 of Volume 8 of the ES, results from WBC's Selby Street automatic

monitoring station for 2018/19 were used to calculate appropriate background levels, as the request of WBC, and these were used in the post-processing of the results from the model for all scenarios;

5. Grids. This refers to the resolution settings for the gridded output from the model. Source orientated gridding was selected for use in the model. When this is selected, ADMS-Roads adds additional receptors to the user-defined grid in two stages. Firstly, extra receptors are added in and around road sources. Secondly, three additional interpolated points are added between each pair of points from the first stage. In this way more points are located close to sources than in a standard grid pattern. Mr Sullivan has now been provided with all of the output data from the model which contains the grid references and the concentration values for more than 12 000 points across the study area for the with and without scenarios for 2022; and
 6. Outputs. This screen is used to specify the pollutants and sources for which output is to be calculated, together with the type of output required from the model. In this case, long term averages for NO_x, PM₁₀ and PM_{2.5} were specified along with calculation of the 90.5 percentile level for PM₁₀.
- 3.3 In terms of outputs or reporting, full details of the model used, its settings and the conservative nature of the inputs used have been provided in the ES. The Institute of Air Quality Management (IAQM) recommends the following for air quality reporting (my comments are in green);

“6.22 The report prepared detailing the results of the assessment should contain the following information (but not necessarily in this order):

- a. *Relevant details of the proposed development. A description containing information relevant to the air quality assessment should be provided, although a fully detailed description of the proposal is not required. This should identify any on-site sources of pollution and an overview of the expected traffic changes or the changes in emissions from the site for a specified year, e.g. the opening year or year the project is completed if phased. A brief introduction to the sensitivity of the area should also be provided, noting the presence of an AQMA and any nearby sources that may affect the local air quality. The proposed location of any sensitive receptors in relation to these nearby sources should be described. An introduction to the pollutants and sources to be assessed should be provided and, if appropriate, those that have been scoped out of further assessment.”*

This information is provided within the ES.

“b. The policy context for the assessment. This should summarise the national and local policies that should be taken into account in the assessment. In London this will also include the Mayor’s policies. This is especially important where there are local policies designed to improve air quality.”

This information is provided within the ES Volume 8 within chapter 12, section 12.2.

“c. Description of the relevant air quality standards and objectives. Most air quality assessments will be carried out to assess compliance with UK air quality objectives.”

This information is provided on page 170 of ES Volume 8 within Table 12.10: Air Quality Strategy Objectives (England) for the Purposes of Local Air Quality Management.

“d. The basis for determining significance of effects arising from the impacts. The descriptors used for describing the severity of impacts should be set out, together with the basis for determining the significance of the effects arising from air quality impacts.”

This information is provided within the ES Volume 8 within section 12.3.

“e. Details of the assessment methods. This section should provide details of the methods, including the model (and version number) and the input data used for the assessment and any assumptions that have been made. Where a commonly applied method is used, a detailed description of the model itself is not required. Details should be provided on all local input data and assumptions, including:

• the emission data and their source, with details where non-standard data are used;”

Traffic data provided at AQ4 of Volume 9 of the ES page 558.

“• source of the meteorological data, with a description of how representative they are of the conditions in the vicinity of the proposed development;”

Stated in Appendix AQ4 of Volume 9 of the ES.

“• baseline pollutant concentrations;”

This information is provided within the ES Volume 8 within section 12.4.

“• background pollutant concentrations;”

This information is provided within the ES Volume 8 within section 12.4 and in AQ4 of ES Volume 9 page 563.

“• choice of baseline year;”

This information is provided within the ES Volume 8 within section 12.4.1.

• basis for NO_x:NO₂ calculations.”

This information is provided within the AQ4 of ES Volume 9 page 563.

“There will be some variation between requirements for reporting data relating to point sources and road traffic. The former will have some physical properties of the emission to be reported, i.e. stack height, diameter, emission velocity and exit temperature. The latter will require details of assumptions made regarding emission factors and features of the traffic flows used in the model, such as speeds and vehicles types, e.g. percentage of heavy duty vehicles (HDVs) in the traffic.”

Information on traffic speeds and HDV % is provided at AQ4 of Volume 9 of the ES pages 558-559.

- “f. Model verification. This will normally be expected for modelling of road traffic emissions, but is not practicable for point-source modelling. If verification is not done, then some justification or explanation will be required. Model verification involves a comparison of the predicted versus measured concentrations, and allows an adjustment to be made to account for systematic errors. Such errors may include uncertainties in traffic flow, vehicle emission factors and estimated background concentrations, as well as limitations of the model to represent dispersion in settings where air flow is affected by roadside buildings, trees etc.. Model verification will be important, especially where predicted concentrations are close to the objective, and should be based on the most appropriate available monitoring data (and for some schemes it may be necessary to carry out specific monitoring to allow robust model verification to be undertaken). A more complete description of the approach to model verification is provided in LAQM Technical Guidance. Full details of the verification should be provided in the assessment.”*

This information is provided within AQ4 of ES Volume 9 pages 563 – 565.

- “g. Identification of sensitive locations. Local receptors should be identified, including residential and other properties close to and within the proposed development, as well as alongside roads significantly affected by the development, even if well away from the*

development site, and especially if within AQMAs. These receptors will represent locations where people are likely to be exposed for the appropriate averaging time (dependent on the air quality objective being assessed against)."

This information is provided within AQ9 of ES Volume 9 page 576.

"h. Description of baseline conditions. The findings of any site visit(s) and/or desktop investigations will be set out, noting sources that may affect local air quality. A description of available monitoring data will be important to help define baseline conditions and put the model results into context.

Where monitoring data are included in the report, it will be important to include details of the monitoring locations, the monitoring method, sampling period, data capture and any adjustments applied to the data, such as diffusion tube bias adjustment factors. Reference should also be made to the background maps produced by Defra, together with any adjustments of these mapped values to take account of local monitoring (but only where the monitoring is at true background sites). Reference should also be made to the Defra maps showing sections of road where the limit value is exceeded, as these represent the 'official' exceedences of the limit value, as reported to the European Commission. These maps are only available (at the time of writing) for 2013 and not for any future years."

This information is provided within the ES Volume 8 within section 12.4.

"i. Assessment of impacts. Results of modelling the 'with development' scenario should be clearly set out in tables, and where appropriate as concentration contours on maps of the study area. Comparisons should be made with the 'no development' conditions. Differences in concentrations between 'with development' and 'no development' conditions should also be tabulated. Descriptions of the impacts at the individual receptors should be provided (see section below), taking into account the absolute concentrations in relation to the air quality objectives. A comment on the sensitivity of the results to input choices is desirable, so that a view make be taken of the uncertainties."

This information is provided within the ES Volume 8 within section 12.5 for individual receptors and at AQ11 to AQ15 within Volume 9 in terms of contours. Mr Sullivan has been provided with a set of outputs for each grid point considered in the model for both the without and with development models and a spreadsheet of the differences between pollutant levels for the two models for more than 12 000 data points.

"j. Description of construction phase impacts. These impacts will relate primarily to dust emissions, which give rise to dust soiling and elevated PM₁₀ concentrations, although

construction plant and vehicles may need assessment. The assessment should take into consideration the likely activities, duration and mitigation measures to be implemented. The distance over which impacts are likely to occur and an estimate of the number of properties likely to be affected should be included. This assessment should follow the guidance set out by the IAQM.”

The dust assessment is provided in ES Volume 8 at section 12.5.2 to 12.5.5. IAQM guidance was followed when completing the dust assessment, reference to the IAQM guidance document is made in section 12.2.23 and further details of the construction dust assessment are provided within Appendix AQ5 of Volume 9 of the ES.

“k. Cumulative impacts and effects. In many cases, the impact of the development being assessed will have a cumulative effect with other planned developments, which may or may not have planning permission. Where these developments have been granted planning consent and are therefore ‘committed’ developments, their impacts should be assessed cumulatively with those of the application site. The contribution of these committed developments should be accounted for in the ‘future baseline’, provided that their contributions can be quantified. This situation can arise when several such developments are contributing additional road traffic on one stretch of road. In some particular cases, there may be another notable proposed development (without planning permission) in close proximity that could contribute an impact at receptors in combination with the primary development being assessed. In these circumstances, it may be necessary to quantify this combined impact for selected receptors and assess it against the future baseline. These occasions and the need for this form of scenario assessment will be rare.”

Table 12.24 within Volume 8 of the ES details the developments considered within the assessment – Parkside is included.

“l. Mitigation measures. In those cases where a significant effect is identified then the measures to be employed to avoid, reduce and, where appropriate, offset this effect should be set out. Even where the effect is judged to be insignificant, consideration should be given to the application of good design and good practice measures, as outlined in Chapter 5.”

Mitigation is discussed at section 12.6 of Volume 8. Construction dust will be controlled via a CEMP secured through a condition. Road traffic mitigation can also be secured through a planning condition.

“m. Summary of the assessment results. This should include:

- *Impacts during the construction phase of the development (usually on dust soiling and PM10 concentrations);*
- *Impacts on existing receptors during operation (usually on concentrations of nitrogen dioxide, PM10 and PM2.5);*
- *Impacts of existing sources on new receptors, particularly where new receptors are being introduced into an area of high pollution;*
- *Any exceedances of the air quality objectives arising as a result of the development, or any worsening of a current breach (including the geographical extent);*
- *Whether the development will compromise or render inoperative the measures within an Air Quality Action Plan, where the development affects an AQMA;*
- *The significance of the effect of any impacts identified; and*
- *Any apparent conflicts with planning policy."*

This information is provided in the ES. As to the final bullet point, there are no conflicts with planning policy as the proposed development will not give rise to any significant air quality impact and in that respect complies with Policy QE6 of the Council's Core Strategy.

3.3 In summary, the ES is compliant with IAQM guidance. Furthermore, Mr Sullivan has been provided with additional information, as outlined in section 3.2 and his comments are misplaced.

4.0 The application is in direct opposition to Warrington AQAP (section 1.2 and section 6)

4.1 Para. 181 of the NPPF states that: *"Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan."*

4.2 It can be seen that in relation to development management as opposed to plan-making (i.e. in relation to the determination of applications for planning permission), the

requirement set by the NPPF is that there should be consistency with the local air quality action plan if development is proposed within an AQMA or a Clean Air Zone. The proposed development will not result in any new development within an AQMA or a Clean Air Zone and that requirement does not, therefore, apply.

4.3 Moreover even if the requirement at the end of para. 181 of the NPPF did apply, the proposed development is consistent with the Council's Air Quality Action Plan ("AQAP"). The latter is, as its name indicates, an action plan. Consistency with the AQAP should therefore be assessed (for the purpose of para. 181 of the NPPF) by reference to the series of 17 actions that are set out in the AQAP (see the Summary on p. iii of the AQAP). The proposed development is not inconsistent with any of those.

4.4 The list of five "priorities" at para. 3.5 of the AQAP is simply a statement of priorities. Those priorities are not the operative part of the AQAP by reference to which consistency with the AQAP should be assessed. That is set out at Section 5 ("AQAP Measures"), which section explains the 17 actions in more detail. It is difficult to see how the development that is planned for the Council's area could come forward if the five priorities were to be applied as some form of "test" to be satisfied by every development proposal.

**5.0 Construction traffic not modelled
(section 1.2d, section 2d and Section 8)**

5.1 At section 1.2d of Mr Sullivan's proof it is asserted that there are significant weaknesses in the air quality modelling undertaken because;

"The model used by Satnam explicitly excludes impact on air quality from site traffic, even though this is accepted to be at high volumes over a 10 year period. HGV movements related to site traffic are missing in their entirety from Satnam's predicted future traffic levels"

At 2d he states;

"We note that the construction traffic impact on NOx and particulate pollution has not been included in the modelling, on an assumption that this will have negligible impact. This is not a safe assumption, particularly in such a sensitive site"

Mr Sullivan also states at section 6.5 that *"The construction phase is acknowledged by the appellants to involve high levels of HGV traffic throughout the 10 year+ construction*

- phase” and at section 8.3 he points to the construction dust assessment provided within the AQ5 of Volume 9 of the ES which uses the input of “more than 50 HDV outward movements in any one day”.*
- 5.2 Mr Sullivan is mistaken in his assertion. The inputs of the dust assessment, like the road traffic assessment inputs, were set at conservative levels for robustness. The data in the ES does not support the level of HGV movement used within the dust assessment; the data used in the dust assessment was an overestimate and the data in the ES presents what will actually occur. The data indicates that the impacts of construction traffic will be insignificant.
- 5.3 The ES states at 9.5 of Volume 8 that;
- “It is anticipated that the development will come forward in 10 phases over a 10 year period with typically around 120 residential units being constructed each year; with the relocated sports pitches in year one, the local centre and care home opening at the end of year two, and the primary school by the end of year eight.”*
- 5.4 Tables 9.5.2 and 9.5.3 of Volume 8 of the ES provide details of proposed HGV movements related to construction.
- 5.5 Table 6.2 of the Institute of Air Quality Management Guidance provides indicative criteria as to when an air quality assessment is likely to be required. The guidance advises that, if none of the criteria are met, then there should be no requirement to carry out an air quality assessment for the impact of the development on the local area and the impacts can be considered as having an insignificant effect (paragraph 6.17). Two of the criteria refer to changes in traffic flows. In relation to HDV flows, the indicative criteria that an air quality assessment should be completed is;
- “A change of HDV flows of:*
- *more than 25 AADT within or adjacent to an AQMA*
 - *more than 100 AADT elsewhere.”*
- 5.6 The data within the ES indicates that the levels of increase in HGV AADT within and outside of the AQMA will be below the criteria within the IAQM guidance and therefore do not trigger the need for assessment. Thus the impacts of construction traffic are insignificant.

5.7 One of the planning conditions will require a Construction Management Plan to be agreed. This will cover each phase of the development and include details of lorry routing and hours of site operation, as well as the maximum size of vehicles.

6.0 Allegation that the site is unusually sensitive

6.1 Mr Sullivan asserts at section 2a that this is an unusually sensitive site and advises that several existing homes already fall within one of the Air Quality Management Areas (AQMAs). At section 7 he states that *“many hundreds of people are significantly affected by poor air quality bordering this site”* and *“very large numbers of people already live and travel within an area which falls outside nationally-mandated air quality levels”*.

6.2 There are dwellings located within the AQMA on Winwick Road, Sandy Lane West and Long Lane. The development, however, will not bring forward new homes within the AQMA and will not have a significant impact on existing levels of air quality within the AQMA at the locations of relevant receptors. A “relevant receptor” is a descriptor used within IAQM guidance. A receptor location is relevant if it is one at which a particular air quality objective applies.

6.3 The AQMA was declared on the basis of annual average levels of NO₂. This objective applies at locations defined in Box 1 of the document LAQM.TG(16) (Core Document reference OD 35) an extract of which is shown below;

Box 1.1 – Examples of Where the Air Quality Objectives Should Apply

Averaging Period	Objectives should apply at:	Objectives should generally not apply at:
Annual mean	All locations where members of the public might be regularly exposed. Building façades of residential properties, schools, hospitals, care homes etc.	Building façades of offices or other places of work where members of the public do not have regular access. Hotels, unless people live there as their permanent residence. Gardens of residential properties. Kerbside sites (as opposed to locations at the building façade), or any other location where public exposure is expected to be short term.

6.4 It is agreed that there are a number of buildings within the AQMA within which people live and work, and that a number of people travel through the AQMAs declared by WBC. However, the number of people affected by poor air quality is exaggerated by Mr

Sullivan. The annual average objective for NO₂ does not apply to people travelling through the AQMAs, nor to most workplaces within the AQMAs. It applies only at the façades of residential properties, schools, hospitals and care homes and the like.

- 6.5 Additionally, the evidence provided by WBC indicates that air quality in the area is improving. Air pollution levels do fluctuate year on year but the latest ASR from WBC (Core Document reference OD 36), which contains 2019 monitoring results, reports that the longer term trend in Warrington shows that levels of NO₂ are improving and indicates improvements around Winwick Road which are referenced in the text of the document at page 17;

“Along the A49 Winwick Road concentrations have improved but there remain locations that have a risk of exceedance. Winwick Road 1 (DT31) is showing further reductions to 30.2 µg/m³. Winwick Road location 2 (DT32) shows a marginal risk of exceedance whilst Winwick Road 3 (DT33) measure 39.8 µg/m³, at the objective limit but has improved since 2018.”

- 6.6 In relation to the motorway AQMA, the 2020 ASR reports significant improvements at DT6 located just outside the motorway AQMA, approximately 60 m from the M62 and within the Executive Summary it is reported that:

“There are now a number of locations within the Warrington AQMA that now meet the national limits, whilst for the Motorway AQMA, monitoring is showing that the distance from the edge of the motorway could be reduced. The Council will consider in the 2020 ASR the trend of improvements and whether to amend the extents of the AQMAs. At this time, as precautionary approach and due to the traffic links of the roads, the Warrington AQMA and the Motorway AQMA, will remain in place and will not be amended at this time.”

- 6.7 I have added the latest monitoring results for the automatic monitoring station and diffusion tubes detailed in the ASR into the tables set out in Volume 8 of the ES in **BLUE** text and show these below.

Table 12.14 - Local Authority Annual Mean NO₂ Results - Automatic Monitoring Station

Site ID	Type of site	OS Grid reference	Level of nitrogen dioxide (µg/m ³)				
			2015	2016	2017	2018	2019
CM1 Selby Street	Urban Background	359151, 388218	24.4	25	21	21.4	20.5

**the annual air quality objective for NO₂ is 40 µg/m³*

Table 12.15 - Local Authority Annual Mean NO₂ Results – Diffusion Tubes

Site ID	Type of site	OS Grid reference	Level of nitrogen dioxide (µg/m ³)				
			2015	2016	2017	2018	2019
WA123 M62 Radley Lane	Roadside	361655, 391914	-	-	-	29.7	23.5
WA95 Winwick Road 1	Roadside	360598, 389820	39.5	39.9	34.7	32.6	30.2
WA96 Winwick Road 2	Roadside	360484, 390416	47.2	50	44.2	40.3	36.6
WA112 Winwick Road 3	Roadside	360434, 390968	52	55	49.3	43.9	39.8

**the annual air quality objective for NO₂ is 40 µg/m³*

- 6.8 The latest monitoring data clearly indicates an improving picture of NO₂ levels in the Winwick Road area.
- 6.9 Mr Sullivan does not demonstrate in his evidence that this is an unusually sensitive site; it is similar to many sites within most urban areas. Air quality within the area is, in fact, improving. There will be no new buildings as a result of the development located within either of the AQMAs nor will there be any significant impact on air quality within the AQMAs as a result of the development.

7.0 Impact of construction dust on health

- 7.1 At section Section 2c of Mr Sullivan's proof it is stated that;

"Impact to health caused by construction activity is shown by the appellant's consultants to have a Medium to High risk to human health"

- 7.2 This refers to an output of the construction dust assessment **before** mitigation is applied. The assessment continues on to say at paragraph 12.7.1 of Volume 8 of the ES that:

*“With the recommended mitigation measures in place, the residual effects are considered to be negligible during the construction phase of the Proposed Development, and therefore the residual impact of construction dust is **Not Significant**.”*

- 7.3 There is no reason why dust cannot be controlled on this construction site and a Construction Environmental Management Plan will be drafted with more details on measures to be taken to do so.

8.0 There is no safe level of air pollution (section 2e and sections 4 and 5)

- 8.1 At Section 4, Mr Sullivan describes the health impacts of pollution and at section 5 discusses the safe level of exposure to pollution.

- 8.2 The health impacts of air pollution have long been recognised and the UK has an established framework for considering air quality impacts in relation to planning applications, as described in section 12.2 of Volume 8 of the ES.

- 8.3 The National Planning Policy Framework is a material consideration in planning decisions; it sets out the Government’s planning policies for England and how these should be applied. It states in paragraph 181 that planning policies and decisions

*“should sustain and contribute towards compliance with **relevant limit values or national objectives for pollutants**, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.”*

- 8.4 Relevant limit values and objectives for air pollutants are found in the Air Quality Standards Regulations 2010 which implement EU directives on air quality in England. The standards were based on an assessment of the effects of each pollutant on public health and recommendations by the Expert Panel on Air Quality Standards, The European Union Air Quality Daughter Directive and the World Health Organisation.
- 8.5 NPPF is supported by Planning Practice Guidance (PPG) and PPG has been issued in respect of air quality. It was considered in preparing the air quality assessment for this development.
- 8.6 Local Planning Policy and AQAPs are also relevant and were considered in the assessment of air quality for this development. The Peel Hall site is identified in the emerging local plan for residential use. The Air Quality Action plan for Warrington identifies at page 9 that air quality modelling and assessments, linked to traffic data, would be produced in order to allow a number of scenarios with the developing Local Plan to be evaluated. As acknowledged on page iii and page 6 of the 2020 ASR, Local Plan growth, and associated increases in traffic, have been assessed for air quality impacts as part of the AQAP. This assessment concluded that nitrogen dioxide levels are expected to improve in Warrington due improvements in vehicle emissions outweighing increases in the number of vehicle journeys. The Peel Hall site was included within the study.
- 8.7 To assist in technical assessments, the Institute of Air Quality Management has issued guidance on both planning and air quality and the assessment of dust from demolition and construction.
- 8.8 All of these issues have been considered within the assessments concerning air quality completed in respect of the development; there is no conflict with legislation, policy or guidance. The local authority is also in agreement with this conclusion as indicated in the signed statement of common ground for air quality.
- 9.0 Conclusion**
- 9.1 In my view, the points raised by Mr Sullivan appear to stem from a misunderstanding of the information and data within the ES and of the way in which air quality is considered in respect of planning applications. The air quality assessment for this development is sound and has considered all relevant policy and guidance. It concludes that the

development will not have a significant impact on air quality; a position supported by the WBC as acknowledged in the statement of common ground for air quality.