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Warrington Local Plan Examination in Public	
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1 Introduction

1.1 Stockton Heath Parish Council has consistently raised issue over concerns about borough wide and localised problems with air pollution and air quality. Such was the level of concern that the Parish Council has invested in its own monitoring equipment to ensure that accurate assessment can be made.

1.2 This equipment is located on the A49 north of its junction with the A56.

1.3 The Parish Council has asked to make representations on various matters at the examination. Allocations for new development in South Warrington and the inadequacy of related infrastructure raise issues of considerable concern, not least the impact on air quality in Stockton Heath as road traffic is channelled through the village, into areas of existing congestion and consequent issues with air quality.

2 General issues for air quality

2.1 There are a number of existing air quality management areas in Warrington. These are based around the motorway corridors of the M6, M56 and the M62 and the A49 as it enters the town centre.

2.2 The proposals contained within the proposed development plan increase the risk of issues for air quality.

2.3 The Air Quality Management Study produced to support the PSV2019 has not been updated. A consultation version of an Air Quality Action Plan was produced in February 2021 but has not as yet been adopted.

2.4 There does not appear to any consideration of the closure of Fiddlers Ferry Power Station.

2.5 DEFRA figures are quoted in WBC Air Quality Annual Status Report 2020 dated June 2020. This report notes improvement in levels of NO_2 Nitrogen Dioxide levels but an increase in levels of particulate matter PM 2.5 and PM 10. The source of pollution is recognised as road transport. The report notes that growth plans for the Borough emphasise the need for long term action plans.

2.6 The same DEFRA figures indicate that every Borough in Greater Manchester fails to WHO standards. The routes into Manchester from Warrington through Salford and Trafford are specifically recognised as exceeding limits for NO_2 up to 4 times the suggested WHO limit of 10µg/m^3. Figures in the EDNA illustrate the clear relationship between place of residence in Warrington and place work in Greater Manchester. There is an undeniable link between housing supply in Warrington and the Greater Manchester employment market and therefore with traffic entering parts of the Manchester highway network susceptible to issues with air quality.

2.7 Recent attempts to introduce air quality management controls across the whole of Greater Manchester are clear evidence of the level of concern. It would be perverse for Warrington to allocate sites for development which would potentially be restricted as they cross the boundary shared with Greater Manchester with no such measures for the area for which WBC is responsible.

2.8 It is possible that the introduction of charging through controls across Greater Manchester would result in journeys through Warrington to avoid those charges

2.9 The location of Warrington outside the Greater Manchester Combined Authority reduces scope for public transport initiatives to affect such travel patterns.

2.10 As it stands those plans are not an apparent element of a PSV totally focused on road base transport.

2.11 The 2019 AQMS notes that traffic levels predicted in the plan are based on the Multi-modal Transport Model, the veracity of which is questioned above. If, as suspected, the model anticipates traffic flows which assume no closure of the Ship Canal swing bridges, it follows that the assessment of impact of development on air quality is similarly flawed.

2.12 There is no clarity as to how the seismic modal shift in transportation will transit from road based travel to work and freight movement. Employment allocations rely heavily on the logistics sector and road based transport onto an already highly congested network. Initial infrastructure improvements will be focused on highway development. Public transport infrastructure is only planned for the end of the plan period or beyond.

2.13 The Air Quality Management Study assumes that increases in traffic, which is currently the main source of air pollution, will be balanced by technological changes which will remove road vehicles as a source of NO^2 and harmful particulates by 2040. This is of course outside the Plan period and it seems likely that significant parts of the development would take place before changes in technology come into effect. The Plan assumes that development will reach a peak in the mid 2020's – some 15 years prior to these additional controls and measures coming into force.

2.14 The Air Quality Management Study notes the impact of traffic speed on pollution and air quality. It is difficult to judge from the technical data provided as to

how much weight this has been given. Given comments noted above it is clearly a concern that congestion will increase as a result of the development proposed. The impact of closures of the swing bridges on congestion, and therefore on air quality, receives no consideration in the report.

2.15 The report notes a number of locations where air quality is currently a matter of concern. These areas will potentially suffer from air quality which is below emerging international WHO standards. Understandably these routes coincide with major traffic arteries, with key receptors identified as those dwellings and buildings at the edge of the highway. The study fails to take account of the significance of many of these routes as public thoroughfares and shopping streets – London Road, Stockton Heath, for example. The study does not take into account increases in pedestrian and cycle routes, a key element of the modal shift away from car transport and therefore, the increasing number of people exposed to traffic pollution.

2.16 The WHO Ambient Air Quality Database v11 – 29 May 2018 identifies towns and cities exceeding the recommended WHO limit of 5µg/m^3 for PM2.5. At 14µg/m^3 Warrington is considered to have one of the highest levels for this type of particulate in the UK. The WBC Air Quality Action Plan notes strong evidence of impact from PM2.5 but has only one monitoring site, on Selby Street adjacent to the A57 on the western side of the town centre, to measure levels, and notes that there have been no assessments of any hot spots where concentration could result in raised levels. Review of available data from the Selby Street monitor suggests levels of between 30

and 85µg/m^3, levels which are considered dangerous by the WHO.

2.17 Section 4 of ENV8 references the need to manage impact of transport created by new development the Manchester Mosses Special Area of Conservation which is near to the M62 between junctions 10 and 12. There is little explanation of the detail of impact which needs to be avoided but it is difficult to see how the scale of development proposed in South Warrington can ever be consistent with this policy objective

3 Air quality in South Warrington

3.1 A recent article exploring the best places to live describes Stockton Heath as "snuggled in glorious countryside and with bags of charm, Stockton Heath is the perfect self-contained Cheshire village". This does seem slightly inconsistent with the decision of the Parish Council to purchase its own air quality monitoring equipment, such has been the concern over air quality in the village.

3.2 Stockton Heath already has some of the most congested parts of the local highway network. The junction of two arterial routes, the A49 and the A56 in the middle of the Village, the junction of Lumb Brook Road with the A56 and the A49 crossing over the Ship Canal Swing Bridge.

3.3 It is recognised that increased weight of road vehicles – through the prevalence of SUV's, consequent higher forces in braking, larger tyre sizes and poorer road surfaces increase the production of the most harmful particulates.

3.4 An increase of car traffic through Stockton Heath as a result of the scale of proposed development, together with the paucity of the proposed infrastructure effectively represents the "perfect storm" in terms of the impact on air quality.

3.5 Air monitoring equipment has in place for 2 years, although the pandemic and related untypical road use across that time may casue some figures to be unrepresentative. Even with the considerable reduction in traffic over the monitoring period the daily average for PM 2.5 was measured at 8.47µg/m^3 against a WHO recommended maximum of 5µg/m^3. WBC response to consultation over the setting of UK limits supported use of the WHO

3.6 DfT figures [Provisional Road Traffic Estimates – Great Britain July 2020- June 2021 all motor traffic decreased by 5.5% across that period with car and lorry traffic reduced by more than 8% compared with the year ending June 2020.

3.7 A return to normal traffic levels plus the impact of additional traffic generated by the proposed development would inevitably result in increased pollution and particulate levels, beyond the level recommended by WHO.

3.8 As noted above, the Plan depends on the additional transport demands it creates being accommodated through modal shift or their impact lessened through technological change reducing vehicle emissions. At best this might be achieved at the end of, or after the plan period in the late 2030's or 2040's. The scale of development will, in the medium to long term, perpetuate issues of pollution levels across Warrington at a level acknowledged as damaging to health.

3.9 12.20 Policy ENV8 of the Submission Draft seeks to resist new developments which have an adverse impact on air quality. The scale of development proposed in the SEWUE and the South East Warrington Employment Area would

seem to undermine this objective, exposing residents to higher levels of NO_2 and PM2.5 with consequent issues for morbidity and premature mortality.

3.10 The Air Quality Action Plan for Warrington relies entirely on achieving the modal shift and wider provisions of LTP4. As noted throughout this document it is the view of SWP the totality of LTP4 is undeliverable. That document itself has no expectation of infrastructure being delivered within the plan period