

MATTER 13 - OTHER POLICIES
CD35 2022 Air Quality Status Report

Firstly, Trams For Warrington would like to express its dismay and disappointment that the most up to date Air Quality Status Report dated June 2022 was not made available to the public and to the Inspectors until 6th October 2022. In fact, nobody knew about it until that afternoon. This was a serious oversight and casts doubt on the importance Warrington Borough Council places on air quality issues. Both the Local Transport Plan 4 (LTP4) and the current version of the Local Plan must be informed by air quality in order to reduce the health effects on Warrington's residents.

In addition, it should also be noted that the Warrington Borough Council Officer who attended the Inquiry stated that he 'was not an expert' on air quality matters and he would only be able to answer questions by reading directly from the Report. This meant that respondents were unable to put in depth questions. This was highly unsatisfactory.

Having now had the opportunity to read the Report Trams for Warrington would like to make the following comments:

- There seems to be an assumption that NO₂ measurements can be indicators of the levels of PM_{2.5} and PM₁₀ and this is simply not the case as PM_{2.5} and PM₁₀ result from tyre and road dust and are completely different from NO₂.
- It should be noted that the more houses built in Warrington (up to 4,800 over the Plan period) the more cars will be on the roads.
- The Report also claims that 'Unlike the reduction in levels of NO₂, there has been only a slight improvement in PM levels (PM₁₀ and PM_{2.5}) compared to previous years. This indicates that particulates are less affected by traffic and there are alternative sources such as domestic burning and trans-boundary influences.' This is simply not true for the reason stated above. In addition, the recent energy crisis will mean that more residents will turn to heating their homes using wood burners.
- There is no mention in the Report of the air quality produced in and around the Walton Crematorium. Crematoria are known to be a source of high pollution and as such should be factored into the Air Quality Status Report. Without this information, the Report only provides a partial picture of the actual air quality in Warrington.

- The Council's ambition to become an all-electric bus town is laudable but misplaced. It ignores the fact that buses will be a significant contributor to PM2.5 and PM10 in respect of tyre and road dust. LTP4 does not fully explore other means of steel on steel public transport (trams) which would reduce pollutants and improve air quality.
- WBC says that 'Warrington has no schools located within areas that exceed national limits.' However, as there is only one school with an air quality monitor how is it possible to make this statement?
- The Report states that 'In 2021 the levels of NO2 have increased compared to 2020, largely due to the easing of COVID-19 restrictions and subsequent increases in traffic. However, there has been a trend of gradual reduction in NO2 levels over the last few years when compared to pre-pandemic. ' There is no recognition of the fact that post pandemic levels will increase with the introduction of more highways such as the proposed Western Link and the mass transit corridor East-West of the SEWUE. Both these highways will bring significant levels of HGVs and undoubtedly increase PM2.5 and PM10 levels across the borough.
- World Health Organisation air quality guidelines were revised in June 2021 and were also updated further in 2022. It is unclear in the tables of the Report which measures have been used to produce the data. We are not convinced that the data in the Report is sound.
- Given the current national political certainty and the effect on funding, it is a concern that WBC asserts that 'Measures available to the Council to improve air quality though within the Motorway AQMA remain limited without support from Highways England.'

The updated Air Quality Status Report dated June 2022 provides us with little or no confidence that Warrington Borough Council fully understands that air quality issues should be the starting point for all policies, such as LTP4 and the Local Plan. WBC states that the health and wellbeing of its residents underpins all its policies and yet the most fundamental one relating to residents' directly relating to health and wellbeing seems to be an after-thought.