PROOF OF EVIDENCE OF

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05 April 2023

RELATING TO THE SECTION 77 TCPA 1990 REFERRED PLANNING APPLICATION RELATING TO LAND TO THE WEST OF JUNCTION 20 OF THE M6 MOTORWAY AND JUNCTION 9 OF THE M56 MOTORWAY AND TO THE SOUTH OF GRAPPENHALL LANE AND CLIFF LANE, GRAPPENHALL, WARRINGTON - KNOWN AS THE SIX:56 DEVEOPMENT

WARRINGTON BOROUGH COUNCIL APPLICATION REFERENCE: 2019/34799

PLANNING INSPECTORATE CASE REF: APP/M0655/V/22/3311877

TOWN AND COUNTRY PLANNING ACT 1990 SECTION 77

TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND) ORDER 2015

TOWN AND COUNTRY PLANNING (INQUIRIES PROCEDURE) (ENGLAND) RULES 2000

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1 Executive Summary

- 1.1 This Proof of Evidence addresses matters relating to air quality. It sets out the relevant air quality legislation, policies and guidance, provides a review of the documents submitted in the application, addresses objectors' concerns and reaches overall conclusions as to whether or not the proposed development is acceptable in regard to air quality matters.
- 1.2 The evidence addresses the likely changes in local air quality during the construction of the development, and as a consequence of exhaust emissions from the road traffic predicted to be generated by the scheme once operational, and of accumulative effects with other planned developments.
- 1.3 The key emissions from road transport are nitrogen dioxide (NO₂) and fine particulate matter (expressed as the PM₁₀ and PM_{2.5} size fractions), as these are the air pollutants which are most likely to reach or exceed health-based standards. NO₂ and particulates are the basis of the vast majority of designated air quality zones in the UK. The consideration is therefore whether the levels of these air pollutants will significantly change within a study area likely to affected by the development, whether there will be a need to declare a new or extend any existing designated area in which levels are already elevated, or whether the development will cause relevant health-based standards to be exceeded. The assessments undertaken demonstrate that none of these potential effects will materialise.

- 1.4 The proposal of itself or in combination with other relevant developments will not result in any exceedances of the Government's health-based air quality Objectives, and air quality within designated Air Quality Management Areas (AQMAs) will not be significantly affected.
- 1.5 It is considered that there will be very limited harm to air quality, and therefore that the proposed scheme will comply with the relevant requirements of the Government's air quality strategies and national and local planning policies in respect of air quality matters.

2 Introduction

- 2.1 This Proof of Evidence is submitted to the Inquiry on behalf of Parkside Regeneration LLP in relation to air quality issues associated with the called-in planning application for the Six56 development on land to the south of Grappenhall Lane and Cliff Lane, Grappenhall, Warrington.
- 2.2 The application is an outline planning application with all matters reserved apart from access for:

"A construction of up to 287,909m² (gross internal) of employment floor space (Use Class B8 and ancillary B1(a) offices), demolition of existing agricultural outbuildings and associated servicing and infrastructure, including car parking and vehicle and pedestrian circulation, alteration of existing access road into the site including works to the M6 junction 20 dumbbell roundabout and realignment of the existing A50 junction, noise mitigation, earthworks to create development platforms and bunds, landscaping including buffers, creation of drainage features, electrical substation, pumping station and ecological works".

2.3 The Secretary of State stated that the primary issues in relation to the call-in are:

(a) the extent to which the Development is consistent with Green Belt Policies in the National Planning Policy Framework;

(b) the extent to which the Development is consistent with the Development Plan; and

(c) any other matters the Inspector considers relevant.

- 2.4 To be included for consideration are "the effect of the proposal on the safe and efficient operation of the highway network, local air quality and landscape character"...
- 2.5 This Proof of Evidence does not address Green Belt policy but considers the evidence for the scheme's compliance with National and Local plan policies and technical guidance in respect of air quality matters.

3 Qualifications and Experience

- 3.1 I am employed by Royal HaskoningDHV as a Sector Director in the company's UK Environment Advisory Group. The company is an independent, international engineering and environmental consultancy, with around 6,000 staff in offices based in 30 countries. There are around 600 staff in the UK, and I have been employed in a consultancy role for 20 years. My specialism is in air quality management, emissions impact assessment, atmospheric dispersion modelling and in industrial permitting and compliance. I provide services to clients in Environmental Impact Assessment (EIA), development consenting, compliance and due diligence. I also currently serve as the UK company's Integrity Compliance Officer.
- 3.2 I have a Bachelor of Science Honours Degree in Chemistry and a Master of Science Degree (with Distinction) in Environmental Protection. I am a Chartered Environmentalist, Full Member of the Institute of Air Quality Management, Full Member of the Institution of Environmental Sciences and an Affiliate Member of the Institution of Chemical Engineers, sitting on the Institution's Environment Special Interest Group Committee. I have been a visiting lecturer at Salford and Manchester Universities on ambient air quality and health impacts, Environmental Impact Assessment and Integrated Pollution Prevention and Control. I have recently been invited onto Salford University's Industry Advisory Board.
- 3.3 Prior to my current role I was employed as the Senior Air Quality Officer at Manchester City Council (1994 to 2002). Whilst there I undertook the statutory air quality review and assessments under Environment Act 1995 for submission of reports to Government, and

was the City Council's representative on the Greater Manchester Air Quality Group, and its Dispersion Modelling Expert Group. I was also responsible for the management of an extensive air quality monitoring network of more than 30 sites, including 3 national automatic (AUN) stations, the collation and analysis of data, calibration and site audits.

- 3.4 In an earlier career (1986 -1994) I was a consultant occupational hygienist, gaining professional qualifications in the recognition, assessment and control of hazardous substances in the workplace. The role involved personal exposure assessment surveys and advice on emissions control, for a wide range of chemicals, dusts and gases. I therefore have 37 years' combined experience in the assessment of air pollutants and their effects.
- 3.5 I have delivered expert witness evidence on air quality matters at the Planning Court on behalf of the Royal Borough of Greenwich, and at several Public Inquiries into development applications, including a Transport Interchange on behalf of Manchester City Council, for major port developments in Harwich and Felixstowe, for a Transport Works Act application for the Felixstowe Branch Line, and at the An Bord Pleanála Oral Hearing into a Dublin Gateway port development in Ireland. In 2021 I was the air quality expert witness for the applicant at the Inquiry into the Parkside logistics development, for which permission was granted and the Inspector endorsed the air quality evidence (see Appendix JD 03).

4 Scope of Evidence

- 4.1 This Proof of Evidence sets out the relevant air quality legislation, policies and guidance, a review of the Environmental Statement (ES) and sensitivity tests and cumulative effects. It considers the changes in air quality policy, technical guidance and data since the planning application was submitted. It addresses objectors' concerns and reaches overall conclusions.
- 4.2 The air quality impact assessment which formed part of the submitted ES (Environmental Statement Part 2 Technical Paper 8 – Air Quality, Odour and Dust (Revision 2, 18 February 2019)) [CD 4.9] and relevant commentary in the two ES Addenda was prepared by RPS Consulting Services.

5 Applicable legislation, policies and guidance

Introduction

- 5.1 In recent decades air pollution in the UK has been significantly improved, though regulatory measures which have reduced emissions from road traffic exhausts and industrial processes, and a shift towards cleaner forms of energy.
- 5.2 A recent report published by the Department for Environment, Food and Rural Affairs (Defra) summarised UK air pollutant emissions between 2005-2020 (Air Pollutant Inventories for England, Scotland, Wales, and Northern Ireland: 2005-2020. Defra, October 2022). In England, total emissions of a key pollutant, nitrogen oxides, reduced by 63% in this period. This is largely due to the successive introduction of tighter emission standards for petrol cars and all types

of new diesel vehicles over the last decade. Industrial emissions have also declined due to a shift from coal to gas in the 1990s, and more recently by the increasing share in renewable energy generation. Emissions of fine particulate matter have reduced by 52% since 1990, and by 28% in this more recent period.

- 5.3 Nevertheless, air quality in urban conurbations and particularly near to busy roads does not always meet the European legal limits and the Government's Objectives, particularly in regard to nitrogen dioxide (NO₂). Since the introduction of a Local Air Quality Management framework in the late 1990s, local authorities have had to report on air quality conditions, and to designate areas where pollutant concentrations are elevated. This evidence explains the Air Quality Management Area (AQMA) system (in this Section), and details where there are existing AQMAs in the locality of the proposed development (in Section 6).
- 5.4 The Government has published an air quality plan for tackling nitrogen dioxide in the UK, and for the 37 air quality zones still to meet the nitrogen dioxide limits. Many local authorities are consulting on the implementation of Clean Air Zones, and an Ultra-Low Emission Zone has been introduced in central London which will be expanded in 2023.
- 5.5 As emissions have reduced, some AQMAs have been revoked and many declared areas have tended to be reduced in geographical extent. National air quality mapping shows that background pollutant concentrations are reducing and projections show that this will continue in future years.

EU and UK Air Quality Legislation

- 5.6 The EU Air Quality Framework Directive 96/62/EC on Ambient Air Quality Assessment and Management entered into force in September 1996 (European Parliament, 1996). This was a framework for addressing air quality through setting European-wide air quality Limit Values in a series of Daughter Directives, prescribing how air quality should be assessed and managed by Member States. Directive 96/62/EC and the first three Daughter Directives were combined to form the new EU Directive 2008/50/EC (European Parliament, 2008) on Ambient Air Quality and Cleaner Air for Europe, which came into force June 2008.
- 5.7 The 1995 Environment Act (Her Majesty's Stationery Office (HMSO), 1995) required the preparation of a national Air Quality Strategy (AQS) which set out the Government's Approach to meeting the air quality Standards and Objectives for specified pollutants. The Act also outlined measures to be taken by Local Planning Authorities (LPAs) in relation to meeting these standards and Objectives (the Local Air Quality Management (LAQM) system).
- 5.8 The UK AQS was originally adopted in 1997 (Department of the Environment (DoE), 1997) and has been reviewed and updated to take account of the evolving EU Legislation, technical and policy developments and the latest information on health effects of air pollution. The strategy was revised in 2000 as the AQS for England, Scotland, Wales and Northern Ireland (Department of the Environment, Transport and the Regions (DETR), 2000). This was subsequently amended in 2003 (DETR, 2003) and was last updated in July 2007 (Defra, 2007).

5.9 The Government published its Clean Air Strategy in January 2019 [**CD 4.75**], which reset the focus for the first time since the 2007 Air Quality Strategy revision. The Clean Air Strategy identified a series of 'new' air quality issues, including biomass combustion, shipping emissions, and releases from agricultural activities. There was a recognition that the effects of pollutant deposition on sensitive ecosystems and habitats need greater focus. The concept of an overall exposure reduction approach is set out, in recognition that numerical standards are not safe dividing lines between a risk and a safe exposure, within a population with a varying age and health profile.

Local Air Quality Management

- 5.10The standards and Objectives relevant to the LAQM framework have been transposed through the Air Quality (England) Regulations (2000), and the Air Quality (England) (Amendment) Regulations 2002; the Air Quality Standards (England) Regulations 2010 set out the combined Daughter Directive Limit Values and Interim Targets for Member State compliance. The Air Quality Standards (Amendment) Regulations 2016 implement Directive 2015/1480 and update site selection and sampling matters.
- 5.11The Environment Act 2021 established an environmental targets framework and a legally binding duty on government to bring forward two new air quality targets for fine particulate matter. The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 establish two PM_{2.5} targets for 2040, based on annual mean concentration and also a reduction in population exposure.

- 5.12Air quality standards relate to ambient pollutant concentrations in air, based on medical and scientific evidence of how each pollutant affects human health. The Government's air pollutant 'Objectives' incorporate target dates and averaging periods, which take into account economic considerations, practicability and technical feasibility.
- 5.13Where an air quality Objective is not being met, LPAs must designate those areas as Air Quality Management Areas (AQMAs) and take action, along with others, to work towards meeting the Objectives. Following the designation of an AQMA, LPAs are required to develop an Air Quality Action Plan (AQAP) to work towards meeting the Objectives and improve air quality locally.
- 5.14 Possible exceedances of air quality Objectives are usually assessed in relation to those locations where members of the public are likely to be regularly present and are likely to be exposed for a period of time appropriate to the averaging period of the Objective. This means that annual average Objectives are applied at locations where people are regularly exposed, such as residential properties, schools, hospitals etc. Short term (1-hour) Objectives also apply at pavements of shopping streets and outdoor recreation areas, for example.
- 5.15For the purposes of the EIA submitted with this application, the relevant air pollutants considered were nitrogen dioxide (NO₂), and PM₁₀ and PM_{2.5} particulate matter, and specifically the Government's health-based AQS Objectives for these pollutants, as laid down in the relevant Regulations.

National and Local Policies Relating to Air Quality

5.16The National Planning Policy Framework (NPPF) [**CD 1.1**] was last revised in July 2021 and refers to the LAQM process by recognising 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."

5.17The UK Government Planning Practice Guidance provides guidance on how the planning process can take account of the impact new development may have on air quality. In the Air Quality PPG the key considerations are for developments in locations of existing poor air quality, where additional traffic or other new air pollution sources may be generated, or where new population exposure could be introduced, with due consideration to construction emissions and ecological effects.

- 5.18The PPG states that air quality may be relevant to a planning application where:
 - Traffic near the development may be affected by significantly increasing volume or congestion or altering the fleet composition on local roads;
 - New point sources of air pollution are to be introduced;
 - People may be exposed to existing sources of pollution (development in areas with poor air quality);
 - Potentially unacceptable impacts (such as dust) may arise during construction; and
 - Biodiversity may be adversely affected, especially at designated sites.
- 5.19Where air quality is a relevant consideration the local planning authority may need to establish:
 - the 'baseline' local air quality, including what would happen to air quality in the absence of the development;
 - whether the proposed development could significantly change air quality during the construction and operational phases (and the consequences of this for public health and biodiversity); and
 - whether occupiers or users of the development could experience poor living conditions or health due to poor air quality.

Local Planning Policy

5.20 The Warrington Borough Council (WBC) Statutory Development Plan comprises the Warrington Local Plan Core Strategy, adopted July 2014 [CD 2.1], and of relevance to the site, the Appleton Thorn Ward Neighbourhood Plan, adopted June 2017 [CD 2.3].

- 5.21 Policy QE6 Environment and Amenity Protection sets out that the Council "... will only support development which would not lead to an adverse impact on the environment or amenity of future occupiers or those currently occupying adjoining or nearby properties, or does not have an unacceptable impact on the surrounding area. The Council will take into consideration the following.... air quality". WBC's Environmental Protection Supplementary Planning Document guidance sets out the underlying policy objectives and details air quality assessment requirements, which were fully complied with in this application.
- 5.22Modifications are to be proposed to the emerging Local Plan and the proposals are yet to be consulted upon and established.

Air Quality Planning and Technical Guidance

- 5.23The following technical guidance was used in the preparation of the air quality assessment:
 - Local Air Quality Management (LAQM) Technical Guidance (TG16). (LAQM.TG(16)) (Defra, 2018);
 - Local Air Quality Management (LAQM) Policy Guidance (PG16). (LAQM.PG(16)) (Defra, 2016);
 - Institute of Air Quality Management (IAQM) 'Guidance on the Assessment of Dust from Demolition and Construction', v1.1 (IAQM, 2016) [CD 4.77];
 - Environmental Protection UK (EPUK) and Institute of Air Quality Management (IAQM) 'Land Use Planning and Development Control: Planning for Air Quality' (EPUK & IAQM, 2017) [CD 4.76].

5.24The LAQM Policy [CD 4.78] and Technical [CD 4.79] guidance documents were updated in 2022, subsequent to the application and the ES Addenda. The updates were to align the guidance with the 2019 Clean Air Strategy [CD 4.75] and to the Environment Act 2021, which set out measures strengthen the Local Air Quality Management framework. The technical approach to the air quality impact assessment within the submitted ES remains aligned to the key requirements of the updated guidance.

6 Review of Air Quality Assessments Undertaken

- 6.1 The ES air quality chapter and Addenda were prepared by RPS, and details of the approach undertaken, consultation with WBC, impact assessment findings and conclusions are set out.
- 6.2 The assessment addresses the likely changes in local air quality during the construction of the development, and as a consequence of exhaust emissions from the road traffic predicted to be generated by the scheme once operational.

Consultation

6.3 An EIA Scoping Request was submitted and a Scoping Opinion received from WBC in April 2018. In respect of air quality matters, there was general agreement on the proposed scope and methodology. Meteorological data from the Rostherne station were requested to be used in the dispersion modelling study, and this was agreed. Air quality impacts on 'natural receptors' was requested and this was undertaken.

The Local Air Quality Context

6.4 WBC has designated two AQMAs due to elevated levels of NO₂ pollution from road traffic. The nearest, AQMA No. 1, is a 50 m continuous strip on both sides of the M6, M62 and M56 motorway corridors. A small part of the development is within this AQMA. AQMA No. 4 covers the town centre ring and link roads and this will not be affected by the development. AQMAs No.2 and No.3 were small town centre areas which were declared but later revoked by WBC. Cheshire East Council (CEC) has declared 12 current AQMAs but all are distant from and will not be affected by the development.

- 6.5 The receptor locations most likely to be affected by the proposed development would be those properties in proximity to the road network, on links where road traffic would increase.
- 6.6 Vehicle exhaust emissions comprise a range of air pollutants, and the composition varies with vehicle type and age, fuel, engine load, speed and driving conditions. The key pollutants, those most likely to breach respective health-based standards in the UK, are nitrogen dioxide (NO₂) and fine particulate matter (expressed as the PM₁₀ and PM_{2.5} size fractions).
- 6.7 Therefore, a range of receptors were considered at representative locations, close to the local road network likely to be affected in the construction and operational phases, located within the boroughs of both WBC and CEC. The receptor locations considered in the modelling study were different from those proposed in the Scoping Request, as the likely affected road network evolved during the EIA project, and more appropriate and representative receptors were considered in the ES, with seven receptors added.
- 6.8 The map at Appendix JD02 shows the development site boundary, the AQMA and ecological designations in the locality, and the 31 receptor locations which were considered.
- 6.9 The ES also considered potential air quality impacts upon sensitive ecological receptors. There are no statutory designated sites within close proximity to the site itself, but the traffic network potentially affected by the development includes an area within the Woolston Eyes Site of Special Scientific Interest (SSSI), located approximately 3 km to the north. Road traffic emissions have the potential to impact

upon sensitive ecological habitats within 200 m from a busy road, and the ES describes how relevant Critical Levels and Critical Loads were assessed at this SSSI location.

Assessment Approach

- 6.10For the assessment of the construction phase, a risk-based approach was undertaken in accordance with the Institute of Air Quality Management 'Guidance on the Assessment of Dust from Demolition and Construction, 2016' (the 'IAQM Construction Dust Guidance') [CD 4.77]. This is a conventional approach for such assessments, the IAQM Construction Dust Guidance was produced for the purposes of assessment of air quality effects of infrastructure construction, and the methodology was accepted by WBC. The IAQM Construction Dust Guidance follows a series of iterative screening criteria and concludes with construction phase air quality mitigation measures, relevant to the scale of activities and sensitivity of the local environment. The principle is that with full and proper implementation of the derived mitigation measures, effects on local air quality will be minimised such that the residual impacts can be considered to be 'not significant'.
- 6.11 The assessment of the air quality impact of traffic exhaust emissions in the operational phase was based on the consideration of 31 sensitive receptor locations, selected as representative properties within the study area where existing air pollutant concentrations were greatest and/or where the greatest changes would be predicted.
- 6.12The significance of the predicted impacts was described by the application of technical guidance published by Environmental Protection UK (EPUK) and the Institute of Air Quality Management

(IAQM), 'Land Use Planning and Development Control: Planning for Air Quality', 2017 ('the EPUK & IAQM Guidance') [**CD 4.76**]. The EPUK & IAQM Guidance is widely applied in air quality assessment of development, was produced for the purposes of assessment of air quality effects of infrastructure development, and the methodology was accepted by WBC. In my opinion a 'substantial' impact as defined in this professional Guidance would be equivalent to a 'severe' residual cumulative air quality-related impact on the road network, as set out in the NPPF in regard to highways (paragraph 111).

- 6.13The EPUK & IAQM Guidance [**CD 4.76**] sets out an approach for the consideration of the change in air quality which is predicted to occur at a sensitive receptor, in the context of the existing absolute air pollutant concentration at that location.
- 6.14The ES Addendum provides the following relevant excerpt from the EPUK & IAQM Guidance: the impact descriptors "are not, of themselves, a clear and unambiguous guide to reaching a conclusion on significance. These impact descriptors are intended for application at a series of individual receptors. Whilst it maybe that there are 'slight', 'moderate' or 'substantial' impacts at one or more receptors, the overall effect may not necessarily be judged as being significant in some circumstances." The EPUK & IAQM Guidance further states that "A judgement of the significance should be made by a competent professional who is suitably qualified".

Background Air Quality

6.15The ES provides a description of the existing background air quality within the study area, with reference to monitoring data published in

WBC and CEC LAQM Review and Assessment reports, and also to air pollutant background concentration mapping datasets produced by Defra. These maps provide average air pollutant levels in 1km by 1 km grids across the UK, alongside forward projection factors for future years. WBC's LAQM Annual Status Report (ASR) 2022 [**CD 4.80**] is now available, which details more recent monitoring results than were available at the time of the ES. CEC's latest ASR is from 2021 and provides updated monitoring data up to 2020.

- 6.16Background air quality monitoring data recorded by WBC was used in the ES description of baseline air quality. For NO₂, results from the urban background continuous monitoring station at Selby Street to the west of the town centre were provided. At the time of the ES, the 5-year average concentration between 2013-2017 was 23.3 µg.m⁻³, well below the relevant Objective value of 40 µg.m⁻³. Data reported since that time indicate a reduction in measured NO₂ levels in 2018 and 2019 (21.4 and 20.5 µg.m⁻³ respectively); data for 2020 and 2021 were affected by reduced traffic flows due to the pandemic and are not considered to be representative of long-term concentrations.
- 6.17A NO₂ diffusion tube (reference DT7) was relocated in 2021 to Howshoots Farm, a roadside location adjacent to M6 Junction 20 and within the Motorway AQMA. The 2021 annual mean NO₂ concentration was 35.2 μ g.m⁻³, below the relevant Objective value of 40 μ g.m⁻³.
- 6.18Results from a NO₂ diffusion tube monitoring site within CEC (reference CE65) were also included in the ES. This is a roadside location, approximately 1 km to the south of the development site and

beyond the M56 motorway. The ES reported data for 2013-2016 with an average annual mean concentration of 34.8 μ g.m⁻³. The most recent datasets (excluding the pandemic year 2020) show a lower 5year average value of 32.1 μ g.m⁻³.

- 6.19The background mapped pollutant concentrations across the site and at relevant monitoring stations were also considered. The mapping datasets are periodically updated by Defra, along with future year projections. The datasets considered in the ES considered 2015 mapped data. Given that these were slightly lower than concentrations measured at the Selby Street urban background monitoring station, the measured datasets were used to define baseline air quality for the purposes of the impact assessment, which was a conservative approach. No reduction in these background concentrations was applied for the future year assessments, and this was a further conservative approach, given that background air pollutant concentrations in the UK are expected to reduce over time.
- 6.20 In regard to airborne particulates, the ES provided data from the WBC Selby Street monitoring station, and reported a 5-year average value of 15.5 μg.m⁻³ for PM₁₀ and 11.9 μg.m⁻³ for PM_{2.5}. As was the case for NO₂, these urban background measured values were slightly higher than the available mapped concentration values, the measured datasets, with no future correction applied, were used to define baseline particulate levels for the purposes of the impact assessment, representing a conservative approach.
- 6.21 Since the publication of the ES the Defra background mapping datasets have been updated (in August 2020), and equivalent grid

square NO₂, PM_{10} and $PM_{2.5}$ values are now all lower than were previously predicted. This aligns with a general downward trend in background measurements undertaken by WBC and CEC.

6.22The latest WBC ASR [CD 4.80] concludes 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. The levels of NO₂ at the majority of locations across the borough now meet the national objectives/standards, within and outside of the AQMAs.

Unlike the reduction in levels of NO_2 , there has been only a slight improvement in PM levels (PM_{10} 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 transboundary influences".

6.23In summary, both monitoring data and DEFRA air quality mapping indicate that ambient air pollutant concentrations have been and will continue to reduce over time (discounting the anomalous pandemic years of 2020 and 2021). The air quality impact assessment within the ES adopted a conservative approach in using the available measured rather than mapped background values, and in applying no future reduced correction factor. More recent monitoring and mapping datasets show that air pollutant concentrations are lower in 2023 than were assumed in the modelling study. Impact Assessment – Construction Phase

6.24 For the construction phase assessment, the IAQM Construction Dust Guidance [CD 4.77] was followed, and demolition, earthworks, construction activities and 'trackout' from the site were determined as likely to give rise to a potential overall high dust impact risk. When considered with dispersion pathways and receptor sensitivities, the overall construction dust risk was deemed to be medium. Mitigation measures appropriate to the site as a whole and to the construction phases were set out, and it was concluded that, with full and proper implementation of these measures, which represent good practice for contractors in large infrastructure development in the UK, effects would not be significant. In my opinion, the IAQM methodology is appropriate, was correctly applied, and the conclusion is valid.

Impact Assessment – Operational Phase

- 6.25The future operational phase impact assessment was based on the consideration of air quality at receptor locations under the following scenarios:
 - Without the Proposed Development in 2017;
 - Without the Proposed Development in 2021;
 - With the Proposed Development in 2021;
 - Without the Proposed Development in 2029; and
 - With the Proposed Development in 2029.
- 6.26 The ES impact assessment reported that predicted annual mean NO₂ concentrations in 2021 would be above the relevant AQS Objective both in the existing baseline situation and with the development in operation at two receptor locations Receptor 1 Intack Farm and Receptor 12 Mill Farm. Based on the magnitude of change in

modelled annual mean NO₂ concentrations, a 'moderate' impact was predicted at two other receptor locations – Receptor 3 Masseybrook Farm and Receptor 5 Cliff Lane Farm. All of these are properties lie within 30m of the M6 motorway, where predicted modelling concentrations are likely to be overestimated. Model verification and the use of a measured background value at Intack Farm indicates that the impact at three of these locations would be 'minor'. There is one receptor where the impact descriptor is 'moderate adverse' (Cliff Lane farm) and a further eight with a 'minor adverse' predicted impact. The impact descriptor at the remaining 22 receptors is 'negligible'.

- 6.27 The 1-hour average NO₂ Objective was predicted to be met at all receptors and short-term impacts were considered to be 'negligible'.
- 6.28Overall, a 'minor adverse' impact on NO₂ was concluded for the development in 2021, based on the application of the reference criteria at a representative range of receptor locations, and professional judgement.
- 6.29Predicted total annual mean PM₁₀ concentrations in 2021 were well below the AQS Objective at all receptors. The daily mean PM₁₀ Objective was also predicted to be met at all receptors, and the reported magnitude of change was such that a 'negligible' impact was reported for all receptors, based on the application of the reference criteria and professional judgement.
- 6.30Similarly, for PM_{2.5} in 2021, the relevant Objective would not be exceeded at any receptor and a 'negligible' impact was concluded.

- 6.31 The 2029 future development scenario considered the background pollutant concentration factored for the future year at the same receptor locations. Improvements in background air quality and transport-related emissions is predicted between 2017 and 2029, and it is anticipated that pollutant concentrations will meet the relevant AQS Objectives at all receptors by this future year, without and with the scheme in place. In consideration of annual and short-term average concentrations, the relative change at all receptors, and by applying the reference criteria and professional judgement, the impact from NO₂, PM₁₀ and PM_{2.5} emissions would be 'negligible'.
- 6.32The potential for cumulative air quality impacts was considered in the ES. It was reported that there would be a potential for construction phase dust impacts, should there be future development schemes being constructed within 700m of the site (given the IAQM guidance on effects being possible within 350m of a site boundary), which overlap in time. However, as construction dust management and controls, to ensure no significant off-site effects, are applied on a source basis, then proportionate measures at this and any other construction sites will ensure that cumulative effects would not occur. This is a reasonable conclusion and is the approach generally adopted for the consideration of construction site emissions.
- 6.33In the operational phase, the medium and long-term air quality impacts associated with agreed other existing or approved projects was also considered. Given that predicted traffic flows applied in the modelling accounted for the key future development-related traffic, the cumulative NO₂, PM₁₀ and PM_{2.5} impacts would not be significant.

- 6.34 Appendix 8.1 to the ES describes the modelled impact on the Woolston Eyes SSSI, by comparing modelled NOx levels and deposition values to the relevant Critical Levels and Critical Loads, at the closest point within the designation, in the 2021 and 2029 traffic scenarios. The ES details the development contribution and the total environmental loading including the existing background, and concludes that the predicted impacts are not significant.
- 6.35The assessments were based on a conservative approach in their consideration of background air quality and to the forward projections of traffic generation. The assessments considered roadside receptor locations on links within the network which are most likely to be affected by generated road traffic. As pollutant concentrations diminish with distance from road emission sources, other locations will be less impacted than at the receptors which were considered.
- 6.36 The air quality impact of the development may be considered in two ways, these being the relative change in air pollutant concentrations from the existing conditions, and whether that change would give rise to a total concentration which would cause a health-based benchmark, one of the Government's air quality Objectives, to be breached. Based on both the relative change in air pollutant concentrations over the baseline and the resulting total concentrations, these studies show that the local air quality impact will not be significant.
- 6.37The existing background air quality has been described by consideration of local measurements and Defra mapping datasets, and both indicate that NO₂ and particulate concentrations have

reduced in recent years, both outside and within designated AQMAs. These concentrations are predicted to continue to decline in all locations in future years.

6.38The ES describes proposed air quality mitigation. In the construction phase, the range of dust controls and construction management measures indicated by the site activity risks will be implemented in the CHEMP. The operational phase of the development would not give rise to any significant impacts on air quality, and as such no direct mitigation was proposed. However the evidence of Mr Vogt describes the proposed transport infrastructure and sustainable travel initiatives, and the EV charging point and Travel Plan schemes will have an associated benefit in terms of vehicle emissions and local air quality.

Conclusions

6.39My conclusion is that, whilst air quality is a material consideration in the determination of this application, the development would not be in contravention of either the NPPF or the Air Quality PPG. The NPPF states that development *should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants,* and the evidence shows that no such limit value or objective would be breached as a consequence of its construction or operation. The PPG requires the consideration of *whether the proposed development could significantly change air quality during the construction and operational phases*, and this has also been shown not to be the case.

7 Review and responses to matters raised by third parties

- 7.1 The representations submitted by both Natural England and the Greater Manchester Ecology Unit make no reference to air quality impact on sensitive ecological sites. I thereby conclude that these organisations have accepted the conclusions of the ES in respect of potential impact on the Woolston Eyes SSSI, that is, that the impact of the development will not be significant.
- 7.2 Rule 6 Party South Warrington Parish Councils' Local Plan Working Group (SWP) has submitted a representation as prepared by Groves Town Planning (GTP) Limited, which states "SWP and its constituent Parish Councils have consistently expressed concern on matters relating to air quality. The core substance of this concern is highlighted in the Local Plan Examination Hearing Statement". That Statement (August 2022, GTP reference 2205005) reviewed existing air quality in Warrington, AQMAs, monitoring data, and in particular levels of PM_{2.5} particulate. There is no specific analysis or comment in the representation on the air quality impact assessment as submitted in the application for the development itself.
- 7.3 The health-based air quality benchmarks published by WHO and last updated in 2021 are guidelines for implementation, alongside a series of Interim Targets (which for $PM_{2.5}$ set out a progressive reduction in four Interim Targets of 35, 25, 15 and 10 µg/m³, working towards a guideline level of 5 µg/m³).
- 7.4 Environmental Targets (Fine Particulate Matter) (England)
 Regulations 2023 establish a PM_{2.5} annual mean target in England of 10 μg/m³, to be achieved (at 'relevant' monitoring stations) by 2040.

The 5-year annual average measured $PM_{2.5}$ level in Warrington 2015-2019 (i.e. excluding the pandemic years 2020 and 2021 when road traffic flows were reduced) was 10.3 µg/m³, and the 2023 mapped value for the development site is 6.9 µg/m³, so current levels are around or below the long-term future health-based target.

7.5 A number of other third-party representations in regard to air quality have been submitted and these are summarised with a response in Appendix JD 04.

8 Conclusions

- 8.1 It is my opinion that the air quality assessments submitted were undertaken in accordance with the relevant technical guidance published by Defra by the EPUK & IAQM.
- 8.2 It has been shown in the relevant submitted documents that there will be no significant effects on air quality as a consequence of the proposed development. This is based on the consideration of short-term and annual average effects of traffic-related exhaust emissions at a range of representative human and ecological receptor locations, in a conservative approach. The assessment work was reviewed by WBC's Public Protection group and it was agreed, with the caveat on the traffic projections being valid and agreed, that "the proposed scheme will not have significant impacts in air quality terms and not cause any exceedance in the national standards. Therefore there are no grounds for refusal of the application based on air quality".
- 8.3 Since the submission of the documents, there is evidence from updated monitoring data and mapping datasets released by Defra, that background air pollutant concentrations are reducing over time, and so the baseline is now lower than was assumed at the time of the application.
- 8.4 The implementation of a CHEMP will control dust releases and will limit any effects during the construction stage of the development. During the operational phase of the development, a travel plan will be put into place and electric vehicle charging points will be

provided, to facilitate the changing composition of road vehicles and assist in the mitigation of the effects on local air quality.

- 8.5 The proposal of itself will not result in any exceedances of the Government's health-based air quality Objectives, air quality within designated AQMAs will not be significantly affected and therefore there will be very limited harm to air quality. There will be no cumulative air quality impacts arising from the road network which would be 'severe' in NPPF policy terms.
- 8.6 In this context, the evidence is that in respect of air quality matters, compliance with the relevant requirements of the NPPF, UK AQ Strategy Objectives, the air quality PPG and local saved policies, will be met.

Glossary of Terms and Acronyms

- **AADT** Annual Average Daily Traffic
- **AAWT** Annual Average Weekday Traffic

Air QualityPollutant standards relate to ambient pollutant
concentrations in air, set on the basis of medical and
scientific evidence of how each pollutant affects human
health and the environment

Air Quality Objective Pollutant objectives incorporate future dates by which a standard is to be achieved, taking into account economic considerations, practicability and technical feasibility

Annual mean A mean pollutant concentration value in air which is calculated on a yearly basis, yielding one annual mean per calendar year. In the UK air quality regulations, the annual mean for a particular substance at a particular location for a particular calendar year is:

- in the case of nitrogen dioxide, the mean of the hourly means for that year;

- in the case of PM_{10} , the mean of the 24 hour means for that year.

- **AQMA** Air Quality Management Area
- **AQO** Air Quality Objective
- **AQS** Air Quality Strategy

Background The term used to describe pollutant concentrations which **Concentration**exist in the ambient atmosphere, excluding local pollution emission sources such as roads and stacks

- CAS The Government's latest Clean Air Strategy, published in January 2019
- **CHEMP** Construction, Highways and Environmental Management Plan
- CIA Cumulative Impact Assessment
- **DEFRA** Department for Environment, Food and Rural Affairs

- **Dust** Particles typically in the size range 1 to 75 µm in mean aerodynamic diameter and (according to BS6069) comprising both suspended and deposited material.
- **EIA** Environmental Impact Assessment
- **ES** Environmental Statement
- EU European Union
- HGV Heavy Goods Vehicle
- **IAQM** Institute of Air Quality Management
- LAQM Local Air Quality Management
- LAQM.TG(16) Local Air Quality Management Technical Guidance 2016
- **μg.m⁻³** Microgrammes (of pollutant) per cubic metre of air. A measure of concentration in terms of mass per unit volume. A concentration of 1 μg.m⁻³ means that one cubic metre of air contains one microgramme (millionth of a gramme) of pollutant
- NO₂ Nitrogen dioxide
- **NOx** A collective term used to represent the mixture of nitrogen oxides in the atmosphere, as nitric oxide (NO) and nitrogen dioxide (NO₂)
- **NPPF** National Planning Policy Framework
- **NTS** Non-Technical Summary
- **PM**₁₀ / **PM**_{2.5} Particulate matter with an average aerodynamic diameter of less than 10 microns (μ m) (PM₁₀) or less than 2.5 μ m (PM_{2.5}), expressed in units of μ g.m⁻³.
- PPG Planning Practice Guidance
- SI Statutory Instrument
- **WBC** Warrington Borough Council

Appendix JD01 Non-Technical Summary

- A1.1 This Proof of Evidence submitted to the called-in planning application Inquiry for the Six56 development on land to the south of Grappenhall Lane and Cliff Lane, Grappenhall, Warrington, addresses matters relating to air quality.
- A1.2 The evidence sets out the relevant air quality legislation, policies and guidance, provides a review of the documents submitted in the application, addresses objectors' concerns and reaches overall conclusions as to whether or not the proposed development is acceptable in regard to air quality matters.
- A1.3 The approach to the air quality assessment in the application was to consider the likely changes in local air quality during the construction of the development, and as a consequence of exhaust emissions from the road traffic predicted to be generated by the scheme once operational, and any cumulative traffic effects on air quality when other planned developments are taken into account.
- A1.4 The key emissions from road transport are nitrogen dioxide (NO₂) and fine particulate matter, as these are the air pollutants which are most likely to reach or exceed health-based standards. For context, in recent years road transport emissions in the UK have decreased significantly, (NO₂ by 63% and particulates by 28% since 2005).
- A1.5 The application therefore assessed whether the levels of these air pollutants will significantly change at roadside locations within the study area likely to affected by the development. It also determined

whether there will be a need to declare a new or extend any existing designated area in which air pollution levels are already elevated, or whether the development will cause relevant healthbased standards to be exceeded. An assessment of existing 'baseline' air quality was included, by reviewing Government mapped datasets as well as local monitoring results. There is evidence from updated monitoring and mapped data that background air pollutant levels are reducing over time, and the baseline is now lower than was assumed at the time of the application.

- A1.6 Detailed modelling was undertaken to assess how vehicle emissions would disperse and impact on local receptors, and in consultation with Warrington Council the approach and method was agreed with the applicant.
- A1.7 The assessments undertaken demonstrated that there may be some locations where pollutant levels will marginally increase but none of these increases are significant or will cause a standard to be exceeded. Potential impacts upon the Woolston Eyes ecological site around the M6 to the north of the development will also be not significant.
- A1.8 The proposal of itself or in combination with other relevant developments will not result in any exceedances of the Government's health-based air quality Objectives, and air quality within designated Air Quality Management Areas (AQMAs) will not be significantly affected.

- A1.9 In the construction phase, a range of dust controls and construction management will be implemented. In operation, a Travel Plan and electric vehicle infrastructure are proposed, which will have an associated benefit in terms of emissions and local air quality.
- A1.10 South Warrington Parish Council has raised concerns over air quality in general and specifically the airborne levels of small particulates known as 'PM_{2.5}'. The Government has set a long-term health-based target for this particulate size fraction, and measured and mapped levels in Warrington indicate that the 2040 target is already being met. Responses to other public representations are detailed in my evidence, to clarify matters relating to World Health Organisation air pollution reports and existing air quality.
- A1.11 It is considered that there will be very limited harm to air quality, and therefore that the proposed scheme will comply with the relevant requirements of the Government's air quality strategies and national and local planning policies in respect of air quality matters.

Appendix JD02 AQMA and Receptor Map

Map showing the Development Site, surrounding AQMAs and air quality receptor locations.



Appendix JD03 Summary of Secretary of State Decisions on related developments in the North West

During 2020/21, several planning applications for industrial and logistics development proposals, in Green Belt locations, within the North West of England, were 'called in' for Inquiry. A summary of the Secretary of State's considerations and directions in respect of air quality matters is set out below.

Reference and site location	Decision and Date	SoS Direction excerpts in respect of air quality matters
APP/H4315/V/20/3253194 Former Parkside Colliery East of A49, Winwick Road, Newton Le Willows WA12 8DB	Approved 11 November 2021	" the Secretary of State agrees with the Inspectors that whilst there would be no significant air quality effects, there would be some minor impacts at a small number of locations, which the recommended conditions would help to mitigate". "Overall, notwithstanding the concerns expressed by local residents in respect of air quality matters, there is no clear evidence of conflict with (local) Policy or Framework paragraph 186 with respect to air quality".
APP/V4250/V/20/3253242 Land at Junction 25 of the M6 motorway, Wigan, bounded by the M6 slip road and A49 Warrington road junction to the east, agricultural land to the north and the M6 motorway to the west, Wigan.	Approved 21 June 2021	Part of the site lies within an AQMA, but " air quality matters have been satisfactorily assessed and addressed in the evidence and that there would be no conflict with (local policies), the Air Quality Supplementary Planning Document or paragraph 181 of the Framework".
APP/N4205/V/20/3253244 Land to West of Wingates Industrial Estate, Wimberry Hill Road, Westhoughton, Bolton	Approved 21 June 2021	In respect of air quality, " the Secretary of State agrees with the Inspector that the development would be compliant with (local) Policy in connection with the protection of amenity, resulting in no residual harm to be taken into the overall balance. The Secretary of State therefore considers that the matter is neutral in the planning balance." "No material harm" to air quality was concluded.

Reference and site	Decision	SoS Direction excerpts in respect of
location	and Date	air quality matters
APP/H4315/V/20/3265899 Land At Omega Zone 8, West Of Omega South And South Of The M62, St Helens, Merseyside	Approved 11 November 2021	"A number of measures to help mitigate air quality impacts are embedded into the scheme including the location of electric car charging points, planning obligations to secure bus provision, and the construction management plan secured by planning condition". "On the evidence before me I am satisfied that the proposal accords with Policy CP1 (3i or 3ii) of the CS which seeks to minimise impacts on air quality, and with paragraph 181 of the Framework." "No material harm" to air quality was concluded.
APP/H4315/V/20/3253230 & APP/M0655/V/20/3253232 Land Between A49 Winwick Road And A573 Parkside Road, Including A Proportion Of The Former Parkside Colliery Site And Land From A573 Parkside Road To A579 Winwick Lane Connecting To M6 Junction 22	Approved 11 November 2021	" the Secretary of State agrees with the Inspectors that the proposal is entirely consistent with Framework paragraph 186 and the relevant air quality objectives".
APP/H4315/W/20/3256871 Haydock Point - Land at A580 East Lancashire Road / A49 Lodge Lane, Haydock, St Helens, A12 0HL	Dismissed 11 November 2021	" the Secretary of State agrees with the Inspectors that despite expressed local concerns, there is no clear evidence of conflict with (local) Policy with respect to air quality. He considers that air quality carries neutral weight in the overall planning balance". "The proposed development would cause some harm to air quality in certain locations, which must be weighed against the proposed development. However, the development would not cause any exceedances of standards set out in DEFRA guidance or have a significant effect overall. Harm to air quality should be given very limited weight against the proposal and is not decisive in the planning balance for this case".

Appendix JD04 Interested Party Responses

Interested Party	Summary air quality concern	Response
Mr Andrew Thomson	Severe air pollution in the town as reported by WHO; the obvious increase in traffic and pollution.	Several representations make reference to a WHO report on poor air pollution in Warrington (variously the worst or in the top five of most polluted locations in the UK). WHO publishes measured air quality data from cities around the world, including the urban background Selby St station in Warrington. The same dataset is fully available in the UK (via the Defra UK-Air website), and is published annually by WBC, and is provided in the ES. The representations do not provide the WHO reference, context or year, but the Warrington levels are not the worst or in the top five for any of the published pollutants, NO ₂ , PM ₁₀ or PM _{2.5} . Ranking solely by an annual mean value does not account for the distance to the roadside or necessarily represent peoples' exposure
		My evidence summarises the ES which sets out a detailed study of air quality impacts associated with traffic projected to be generated by the development. The effects of emissions at receptors depends on receptor distance, dispersion, and engine technology, and the context of decreasing background concentrations. Based on the relative change in air pollutant levels and on total concentrations, my evidence shows that the local air quality impact will not be significant.

Interested Party	Summary air quality concern	Response
Mr and Mrs Appleton	The World Health Organisation has named Warrington to be in the top five of the worst in the UK. This development will have a major negative effect upon air quality creating additional harmful pollutants, mainly particulates from diesel engines, which will in time impact on local residents' health.	See response to Mr Thomson above.
Ms Helen Carson	Lorry congestion and pollution. Vehicle fuel emissions and small particulate debris pollution have been shown to increase the incidence of dementia and respiratory disease. Reference to the "Oslo effect".	The PM ₁₀ and PM _{2.5} particulate size fractions have been assessed and reviewed in my evidence, and receptor levels compared to the Government's health-based Objectives. The Oslo effect refers to particulate matter from vehicle tyre and brake wear, as opposed to exhaust emissions. This emission source is better represented by the PM ₁₀ fraction; measured and mapped background levels and modelled data include this source.
Dr Varun Chauhan	Local air quality will worsen as a result of removal of green belt and increased vehicular traffic.	See response to Mr Thomson above.
Councillor Kenneth Critchley	Concern over poor air quality and additional vehicle movements on the A50 and A49; will exacerbate the air pollution issues in Stockton Heath, Grappenhall and Latchford village.	See response to Mr Thomson above. All road links in South Warrington affected by the development were modelled. The 29 road links in a circa 50km ² model domain, traffic changes and vehicle types, and impacts at roadside and other receptors are provided in the ES, as summarised in my evidence.

Interested Party	Summary air quality concern	Response
Hereford House, Porch House Farm	Concern over particulate air pollution and health effects, citing Warrington PM _{2.5} levels in a WHO (2018 report)	See response to Mr Thomson above. Recent Regulations set a PM _{2.5} annual mean target in England of 10 μ g/m ³ , by 2040. The 5-year annual average measured PM _{2.5} level in Warrington 2015-2019 (i.e. excluding the pandemic years 2020 and 2021) was 10.3 μ g/m ³ , and the 2023 mapped value for the development site is 6.9 μ g/m ³ , so current levels are around or below the long- term future health-based target.
Mrs Alex Collier	The impact on air quality will be harmful. Warrington has some of the worst air quality in the country; this will worsen the situation with the corresponding adverse impact on health for its residents.	See response to Mr Thomson above.
Mrs Rachel Garrard	Warrington is already flagged by the WHO as having well below acceptable levels of pollution surely such a development can only lead to it worsening.	See response to Mr Thomson above.
Mrs Catherine Hawley	Concern over increased traffic and pollution	See response to Mr Thomson above.
Ms Kath Douglas Fumer	There are areas close to major roads in Warrington which already exceed the national limit for mean annual nitrogen dioxide.	This is correct and the appropriate AQMAs are designated in these locations. The application and my evidence explain the air quality impact at affected receptor locations.
	Concern that air quality is poor, and refers to the WBC air quality action plan and its action points aimed at improving air quality including those on traffic.	WBC's 2022-2025 Air Quality Action Plan includes policy, infrastructure and monitoring measures and an update on progress on actions. The application does not conflict with or constrain the AQAP.

Interested Party	Summary air quality concern	Response
Mr Christopher Moran	The air pollution in Warrington is already at dangerous levels which would be made worse by the countless lorry movements.	See response to Mr Thomson above.
Ms Jill Rowan	Warrington has recently been highlighted as an area of high air pollution with motorways and busy A roads in this area, why would we add to this problem rather than try to reduce it?	See response to Mr Thomson above.
Mr Terry Furner	More cars, more traffic and congestion, more pollution, more ill health.	See response to Mr Thomson above.
Mrs Bev Walsh	The World Health Organisation has branded Warrington as having the worst air quality within the UK	See response to Mr Thomson above.