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CC

Alison Dyson,
The Planning Inspectorate,
Temple Quay House,
2 The Square,
Bristol BS1 6PN

8th May 2023

Dear Ms Gallagher

Planning Application 2019/34799 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/Cliff Lane (known as Six:56 Warrington) Grappenhall, Warrington

Outline Planning (Major) - Outline application (all matters reserved except for access) comprising the construction of up to 287,909m² (gross internal) of employment floorspace (Use Class B8 and B1(a) offices) including change of use of Bradley Hall Farmhouse to B1 (a) office use (335m²) and associated servicing and infrastructure including car parking and vehicle and pedestrian circulation, alteration of existing access road into site including works to the M6 J20 dumbbell roundabouts 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 & ecological works, accompanied by the Environmental Statement.

As a representative of the Rethinking South Warrington's Future, I would like to respond under Rule 6 of the following procedure applicable to the Secretary of State planning enquiry.

The Langtree Air Quality Report states:

'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.

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.'

This may well be the case but in making this statement, I would respectfully point out that Langtree, and by association, Warrington Borough Council, is content to ignore emerging scientific reports all in the name of enabling a controversial economic development site to pursue profit at the expense of the health and well-being of Warrington residents. There appears to be a lack of understanding in relation to Non-Exhaust Emissions (NEEs) which are the primary source of PM10 and PM2.5. These

are the result of dust that rubber tyres on rubber roads cause and cause significant, pernicious health risks. Any extra traffic (HGVs, cars, buses) that this application, if successful, will bring on to the highway network will compound an already bad situation for the health of Warrington residents.

Whilst Warrington has an AQAP (Air Quality Action Plan) and has two designated AQMAs (Air Quality Management Areas) designed to improve air quality, advancements in scientific knowledge mean that Warrington Borough Council have not been able to keep pace in terms of ensuring adequate air quality monitoring is taking place in ALL area of the town. The monitors that we do have measure NO₂ and only a small number measure PM₁₀ and PM_{2.5}. This is not acceptable and will not give a true measure of air quality in Warrington. This means that the 'baseline' local air quality is not a true reflection. The AQAP 2017-2022 is a 'live' document and subject to an annual review. The current Plan does not appear to have any revisions. If they have taken place, when was it reviewed and what were the adjustments?

The top 5 Key Priorities identified by Warrington Borough Council in the AQAP include Priority 2 - Reduce emissions from HGVs and LGVs and Priority 5 – Ensure that future development is designed to reduce exposure and improve air quality. This application will not enable WBC to achieve these stated priorities.

Air and air pollution is not static and travels some distance. In fact, I do not live within Warrington's AQMA and, in fact, my own address which is semi-rural exceeds WHO limits – it is 46th in the national percentile showing an annual average of PM_{2.5} as 9.69mcg/m³. The WHO limit is 5mg/m³. The reading for PM₁₀ is 15.53mcg/m³. The limit is 15mcg/m³ and the reading for NO₂ is 19.01mcg/m³ and the limit is 10mcg/m³.

A Client Earth advisor says individuals can take Government and Local Authorities to Court over poor air quality. Warrington consistently comes in the top five north west towns with poor air quality. The right to breathe clean air is a fundamental human right. The cumulative harm of constant exposure to poor air quality is now becoming more understood and it cannot be ignored.

A recent report (Impacts of Air pollution across the life course – evidence highlight note) by Imperial College, London, dated April 2023 highlights new perspectives and states 'The short-term impacts of air pollution (worsening symptoms, hospitalisations, and deaths) and long-term impacts (disease development, attributable premature deaths and years of lost healthy life) have been known, extensively studied and reviewed for decades.'

The report goes on to say that 'While headline figures on the health impact of air pollution focus on the equivalent number of premature deaths, **the wider impacts are hiding in plain sight** in the contribution of air pollution to the burden of chronic diseases. These affect our quality of life and have a large cost to society through additional health and social care costs, as well as our ability to learn, work and contribute to society.'

The report highlights new evidence of the impact of air pollution on brain health (dementia, mental health, autism); pregnancy and birth outcomes; the developing child from birth to adolescence and adulthood.

Air pollution in the UK is estimated to cause 40,000 premature deaths each year and the financial burden of this is around £40 billion. In comparison with EU countries the UK ranked 27th out of 37 countries with the highest PM_{2.5}.

Although the Langtree Air Quality report will probably prove that the application will meet all the required limits, the current NPPF pays scant attention to Air Quality and, as yet, we do not know what the new NPPF will say in relation to air quality.

The Imperial College report states 'Actions and policies to reduce the concentrations of air quality are often framed in terms of meeting legal limit values to minimise the harm to human health. These limits should not be perceived, or presented as 'safe', non-toxic thresholds. Abundant evidence

suggests significant impacts below these concentrations, and for some pollutants, such as PM2.5, there is no evidence to identify a threshold where exposure does no harm.'

I would urge you to bear in mind the points above and the fact that poor air quality currently impacts adversely on the health and well-being of Warrington when considering this application.

Yours sincerely

Cllr Sharon Harris (Rethinking South Warrington)