From:
To: Local Plan

Subject: Local Transport Plan 4 response And Local Developement Plan Response

Date: 17 June 2019 17:39:20

FAO Planning Assessor

Dear Sir

I wish to strongly object to the local development plans on the following grounds:

Warrington has the worst rate of small particulate pollution in the UK in 2018 (WHO AAQD v11 May 2018). The increase in housing proposed, combined with desecration of the greenbelt in the south, increases population and traffic and reduces the vegetation currently absorbing some of the harmful gases, naturally filtering the air we breath. This reduced public health and well-being.

- * The loss of green belt will result in urban sprawl and damage to wildlife and health.
- * The suggested description of green belt is not evenly spread around warrington, it is all planned for the south -what is the justification?
- * What are the exceptional circumstances for the green belt to be build on?
- * Why does warrington need 18,000 + homes? The plan is too ambitious. I agree that homes may be needed and could be built sympathetically, but not to the extent proposed around the town centre (Latchford) or in the far south. We do not have the infrastructure to sustain any more traffic or medical resources to accommodate the significant increase in population.
- * Where are the confirmed plans for a new hospital? The current hospital is already overstretched and serves Widnes, Runcorn, Halton and Warrington residents

Potential Increase in Traffic & Reduction in Air Quality from:

- * Extensive new housing on green belt with no detailed Infrastructure provided e.g. roads
- * High density dwellings planned in the Town Centre where will the traffic go?
- * Extensive housing developments have already been built across Latchford with no new roads to support increased traffic and no infrastructure e.g. doctors surgeries. This has put additional pressure on three major roads already indicated as exceeding pollutants. In addition due to lack of amenities build with these developments, it has put additional pressures on policing e.g. Edgewater Park.
- * Construction of Port Warrington could see an increase in shipping down the Manchester Ship-canal, resulting in the swing Bridges turning more and increased emissions from shipping.
- * Additional vehicles travelling over the Cantilever when the bridges swing
- * Vehicles travelling down Gainsbourgh road to access new link road, new homes & avoid swinging bridges
- * No new roads in the East planned across the Manchester Ship-canal to alleviate traffic from the town centre or the south.
- * Congestion/accidents on the M56 & M6 cars divert through Latchford towards the town centre
- * Mass employment land proposed to be built in the south has the potential to further increase lorries and cars travelling through latchford to and from motorway junctions. Why is Fiddlers Ferry that is due to be decommissioned in March 2020 not been allocated as a prime brown field suite for employment land?
- * St. Helens have reduced their housing plan, why hasn't WBC?
- * What is Peel's and Langtree's relationship with WBC in terms of financial reward
- * Does the RSBP know that part of Moore Nature reserve is included in the building of the new Peel Port Warrington? This is sacrilege.

In WBC's Air Quality Report (AQR) June 2018, it states that in 2016 4.9% (that is nearly 1 in 20) of deaths in warrington could be attributed to particulate pollution. Furthermore, some warrington areas, close to major roads, exceeded the levels of particulate pollution, which is recognised to contribute to the onset of cancer and cardiovascular disease. Traffic exhaust fumes and tier dust pollution is a significant contributing factor.

I wonder therefore, how WBC can justify spending over £230 million in land/building purchases to generate income, then state that 'monitoring at the worse locations (of pollution) has been proposed to gain further evidence, although there is a gap in funding at this current time' (AQR).

How is this acceptable? Is public health not important? Meanwhile large dense developments keep being built near major roads. How can councillors say, for example, that traffic & pollution generated from 160 & 189 dwellings passed for planning by Wilderspool Causeway & the Canterliver respectively, will not impact the local area? Why won't WBC invest in the monitoring the worst areas of pollution or actually engage in reducing traffic pollution?

The LTP4 does outline plans to provide better public & cycle paths, park and ride systems and light rail trams,

but this needs to be implemented now, not after all the planning has been completed. In addition there needs to be incentives to leave your car at home, more green planting, reducing the number of dense housing & keep our green spaces etc etc.

Warrington is situated between Manchester and Liverpool and therefore are in their flight path's. It has the Manchester ship canal, which carries daily ships with cargo between the two ports. There is also the Bridgewater Canal and the river Mersey running through the town. Therefore three swing bridges and one tall bridge must carry the traffic into the town centre and beyond. This creates huge bottlenecks of traffic, increasing congestion and pollution. Warrington also is surrounded by three large motorways: the M56, M 62, and M6. When either or all have problems, the traffic is directed through the town. The proposal is to build on all the greenbelt area in the south of the town, which not only provides a green lung, it provides habitation for wildlife, and general well-being for the residents. Other infrastructures also would not cope with such increase including our overstretched hospital and doctors surgeries.

Air quality in Warrington is very poor, and even in Warrington Borough Council's (WBC) own reports it shows the severity of the pollution problem. However the proposal to build vast numbers of homes and employment land by the M56 and M6 junction would significantly increase Lorry flow and pollution from vehicles travelling to and from the site.

There has already been significant building of homes in the town in resent years, with no additional infrastructure added, including roads, doctors and services. WBC are building another bridge in the west of the town, but this will serve additional homes and port Warrington that is to be built. It will have little impact with all the additional houses that is proposed and will support only some of the additional traffic volume.

Environmental impact of increased traffic, both in noise and air quality. Nitrogen Dioxide, Nitrogen Oxides, course and fine Particle Matter (PM10 & PM2.5) pollution from tyre dust and emissions (Oslo effect) have been found to contribute to increased illnesses and mortality (1, 2).

Warrington, among other large towns/cities in the UK, has already missed the original deadline of 2010 to meet pollution limits. In WBC's Air Quality Report (AQR) June 2018 it states, that in 2016, around 4.9% (almost 1:20) of all mortality in Warrington was attributable to man-made particulate pollution. Areas close to major roads are noted as particularly high in nitrogen dioxide levels and exceed national standards.

In February 2018, Warrington's Joint Strategic Needs Assessment (JSNA) (3) report it notes that there are two Air Quality Management Areas (AQMAs) designated in warrington, one is around the major roads that lead into, and around, the town centre, including Knutsford Road, Chester Road, Wilderspool Causeway (all three in Latchford) and the other one monitors the motorways. The It must also be noted that all four of the bridge crossings for the Manchester ship Canal are also in this area of the town.

To travel from the south iether from the East or West you have to drive through Latchford. The Air Quality Assessment (AQA) report, commissioned December 2017, notes that at 4 out of the 6 diffuser monitoring sites in Latchford, exceeded the 40ugm levels for Nitrogen Dioxide annualised level [set out by WHO (4)]. However, the report predicts that additional traffic would have negligible effect on increasing this, a conclusion that is concerning as every little extra counts, particularly as levels are already high in the area and more local development sites are earmarked.

Yours faithfully

Mike Cousen



References:

- (1) https://www.who.int/quantifying_ehimpacts/global/source_apport/en/
- (2) https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(13)62158-3/fulltext
- (3) https://www.warrington.gov.uk/download/downloads/id/16004/air_quality_and_health_isna_report_2018.pdf
- (4) https://www.who.int/en/news-room/fact-sheets/detail/ambient-(outdoor)-air-quality-and-health