



Proof of Evidence - **Summary**
Air Quality

Produced by Jim Sullivan

Rule 6 Party

Peel Hall - APP/ M0655/W/17/3178530

Air Quality PoE Summary

1. My name is Jim Sullivan. I have lived in the area since 1987. I would like to speak about air quality. Further detailed evidence is provided in my Proof of Evidence submission.
2. This is an unusually sensitive site with regard to air quality. The area surrounding Peel Hall currently suffers from very poor air quality. This is so poor as to cause harm to human health and premature loss of life for some people living in Poplars & Hulme and Orford wards. The site at Peel Hall borders two Air Quality Management Areas.
3. One of these two AQMAs runs alongside the M62. This is currently unpopulated for the length of the Peel Hall site, and should remain so.
4. The second AQMA runs down the A49, through an extremely densely populated area. This particularly affects Poplars & Hulme and Orford wards. I present evidence to show that these wards presently suffer health inequalities which can only be made worse by additional traffic generating even higher levels of toxic air. These health inequalities include shortened life expectancy.
5. The appellant's submission includes air quality modelling which claims to show negligible impact on the existing AQMAs as a consequence of the build, and relatively clean air within most parts of the build site itself. I would question the model provided on the following grounds:
 - a. It is based on the traffic modelling work. This is questionable in its own right, given that the survey period was very brief, took place in May when traffic densities are lower than the winter months and did not include, for example, a Saturday with a home game for Wolves
 - b. The traffic model also assumes a reduction in Heavy Duty Vehicles in the next few years. This is an unexplained assumption
 - c. The traffic model assumes that the build would increase Heavy Duty Vehicles only marginally. This seems improbable, given the presence of a 2,000 m² food store and a further 500 m² of other retail outlets, plus a school and a 100 bed care home, all of which would need to be provisioned
 - d. The air quality model explicitly excludes the impact of the Heavy Duty Vehicle movements during construction. These are estimated at more than 50 Heavy Duty Vehicles per day, though no upper limit is provided
 - e. The air quality model itself is not provided. It would not be possible for a third party to replicate the model given the lack of information provided. In other words, we just have to take their word for it. This is not recognised scientific practice. If mistakes have been made in the modelling it is simply not possible to identify them, given the absence of core information

6. Despite this optimistic modelling, the appellant's model does show a number of locations where national and international air quality standards are breached. These are not empty fields but streets where we live. One example would be Gough Avenue, home to hundreds of people and currently exceeding international air quality standards, certainly where it meets Sandy Lane West. These are real lives which are currently being impacted by poor air quality
7. Warrington has an Air Quality Action Plan which defines the town's response to this urgent health risk. This AQAP has 5 priorities. The proposed development contradicts all five of these priorities – it is in direct opposition to Warrington's Air Quality Action Plan.
8. The homes which are planned for this site will need to be built in a manner which mitigates noise and air pollution. In reality, these will be 'lockdown apartments', including many in proximity to the M62 which will have windows which can't be opened. This is not the standard of housing we should aspire to.
9. Part of the site will breach air quality standards. The appellant's approach to this is to define it as an 'ecology corridor'. The strip which has been designated for ecology is actually very poorly suited to this role; this is pure sophistry, an attempt to disguise the true nature of this site.
10. Standards in air quality have consistently improved. For example, the level of NO₂ which would currently breach World Health Organisation thresholds is one eighth the level which applied in 1958. We should expect national and international air quality standards to continue to improve over time.
11. The appellant claims that residents of the new homes would use public transport and cycling to get to work. This is clearly nonsense. The appellant has secured a commitment for three years from Warrington's Own Buses to extend the number 20 and 25 services into the site. These services are already under-utilised, in part because they are slow. Bus usage is reducing sharply in Warrington. Adding a significant extra loop will only make them slower.
12. Access to the rail network from Peel Hall is not well served by buses. The appellant suggests that people would cycle to Padgate, Central or Bank Quay stations from the site. The appellant's own traffic survey shows that only 0.266% of journeys in the surrounding road network are undertaken by bicycle. This is because the roads in this area are choked with traffic and widely perceived as hazardous to cycle on. However many cycle paths are laid down within the site, anybody planning on reaching a railway station will need to cycle on the road network beyond Peel Hall. There is no reason to think that people living at Peel Hall will use anything other than their cars on a regular basis. This will, therefore, become yet another car-dependent estate, adding to air pollution.
13. The appellant states that the dust resulting from the sustained building work will have a 'Medium – High' impact on health. They suggest a number of vague mitigations, but have not committed to funding the hundreds of thousands of pounds of mitigations which would be required to comprehensively mitigate the impact of this extensive 10 year building project. An 8 year old child living in the area at the start of the project would be an adult before she saw a cessation of the site traffic, its associated air pollution and the significant levels of dust generated by the building work. This, in an area where human health is already adversely affected by poor air quality, is simply unacceptable.
14. There is extensive scientific evidence that there is no safe level of air pollution.

15. Why is Peel Hall a special case?

- Peel Hall is already a sensitive site, being subject to two Air Quality Management Areas
- The landlocked nature of the site means that all site traffic – both during the building phase and during live running – must pass through an already-congested road network. This will increase congestion which will, in turn, worsen the air quality challenges faced by local residents
- The site has been designed for car usage. Public transport and cycling will have negligible impact, as they do in the surrounding area
- The population which borders Peel Hall suffers significant health inequalities when compared with the average for Warrington and the average for England. This development will exacerbate an existing problem which is proven to cause ill health and premature death