



Town and Country Planning Act 1990, Section 77

Town and Country Planning (Inquiries Procedure) (England) Rules 2000

The Proposed Development of Land to the West of Omega South and
South of the M62 Bold, St Helens

Topic Statement

AIR QUALITY

Planning Application Reference
P/2020/0061/HYBR

Planning Inspectorate Reference
APP/H4315/V/20/3265899

1. INTRODUCTION

- 1.1 Topic Statements have been prepared to inform the Secretary of State on the matters identified in the Inspector's case management notes which are not addressed in the Council's main proofs of evidence. This Topic Statement is concerned with air quality

2. THE APPLICATION

- 2.1. An Air Quality Assessment (AQA) is included within the Environmental Statement (ES) accompanying the application.
- 2.2 The AQA identifies there are four Air Quality Management Areas (AQMA) within the administrative boundary of St Helens, however the application site is not situated within an AQMA in St Helens.
- 2.3 There are two AQMAs within the administrative boundary of Warrington Borough Council. The north east corner of the application site is adjacent to the 'Motorway AQMA' which is described as a 50 metre continuous strip on both sides of the M6, M62 and M56 corridors, due to the potential exceedances of the annual mean Nitrogen dioxide (NO₂) objective.
- 2.4 During the construction phase, the AQA concludes that there is the potential for minor adverse impacts from dust and particulate emissions to occur intermittently at sensitive receptors. However, subject to mitigation measures, which would form part of the Construction Environmental Management Plan, the effects generated by construction activities would be negligible.
- 2.5 During the operational phase, no significant adverse effects on air quality are anticipated. The traffic effect on nitrogen dioxide and particulate matter concentrations on nearby residential dwellings and other highly sensitive receptors is considered "negligible".
- 2.6 The applicant states there be limited harm caused to air quality.

3. TECHNICAL REVIEW OF THE AQA

- 3.1 The technical review of the AQA was undertaken by the Councils Air Quality officer. The **internal** area of B8 logistics warehouse are for the full element of the application is 81,570m² with 576 car parking spaces, 156 cycle spaces and 48 motorbike spaces with 35 spaces reserved for future EV charging spaces.
- 3.2 For the operational phase, the modelling assessment has been undertaken using ADMS Roads which is widely used for this type of assessment. The assessment measures impacts against the IAQM/EMAQ+ guidance 'Planning for air quality'. The assessment has utilized data from St Helens and Warrington Borough Council's monitoring programs and background data from the DEFRA background maps.
- 3.3 In the Air Quality officers judgement the assessment methodology is robust and consistent with this type of assessment and therefore the conclusions drawn from this will be reliable.
- 3.4 Further clarification was sought on the cumulative impacts of the development and the following reply received 'The AQ assessment included the cumulative developments

considered in the traffic assessment, details of which developments were considered are in section 12.3.36 of the Traffic ES chapter’.

- 3.5 Modelling has been undertaken for 3 scenarios; background year of 2018 (shows two exceedances of annual mean R9 and R12 in Warrington), future baseline (do minimum – without development) in opening year 2021 and design year 2036 (both show no exceedances).
- 3.6 In 2021 – opening year all receptors will be below the national objective, both with and without the development. The greatest increase in annual mean is predicted to be at receptor R5 at 20 Trentham Gardens, Warrington, with a $0.3\mu\text{g}/\text{m}^3$.
- 3.7 The greatest increase in annual mean PM10 concentration is predicted at receptor R5 Trentham Gardens with a concentration change of $0.1\mu\text{g}/\text{m}^3$ which is a negligible magnitude of change. All modelled receptors also have a negligible magnitude of change for PM2.5 in the opening and design years of the development.
- 3.8 For good practice, sensitivity tests were also undertaken and support the conclusion that the impact on air quality is ‘not significant’
- 3.9 Overall the predicted local air quality effect associated with the operation of the proposed development is not significant. However, the development will still have a detrimental impact on air quality, however small and this is in opposition to the overall aims of the action plans for St Helens and Warrington.
- 3.10 The assessment deems that mitigation measures for the development are not required, however it does outline opportunities for enhancement and are outlined in the IAQM/EMAQ+ planning guidance as ‘good practice’. Given that there is an overall detrimental impact on air quality, all be it ‘negligible’, and the development land is green belt, it is the opinion of in the interests of protecting the environment and air quality that the following enhancement opportunities are included within the development.
 - The provision of at least one Electric Vehicle (EV) ‘fast charge’ point per 1,000 m2 of commercial floorspace;
 - Support for and promotion of car clubs for employees;
 - Improvements to cycling and walking infrastructure; and
 - Inclusion of EV points for freight vehicles, where available
- 3.11 The application states that there are 35 spaces reserved for future EV parking spaces, which is below the level proposed above. A proportion of the EV spaces should be put in prior to commencement at a level of 1 space for every 30 parking spaces which equates to 20 spaces and the rest should have the infrastructure to enable more EV spaces as uptake increases.
- 3.12 Conditions advised regard construction dust, travel plan and electric parking.

4. REPRESENTATIONS BY WARRINGTON COUNCIL

- 4.1 Warrington Council have made representations on 12th August 2020. Warrington Development Management Committee considered the above application and the adjacent authority consultation on 5th August 2020 and resolved to offer no objections to the application described above subject to the following requirements:

- A commitment to explore opportunities to reduce the developments impact upon climate change.

Conditions suggested regard construction environmental management plans and odour abatement.

5. OTHER REPRESENTATIONS ABOUT AIR QUALITY

5.1. A full description of the representations is set out in the Committee Report. The main issues raised are summarised as follows:

- Pollution from additional traffic, especially diesel fumes and HGV movements will not have a negligible local impact.
- Development will contribute to the production of carbon dioxide both during construction and operation, and from the destruction of mature woodland.
- Massive increase in air pollution
- St Helens already has unacceptable levels of air pollution and associated illness and death counts as a result.
- Increase pollution to the already poor air quality of Warrington mainly Burtonwood, Great Sankey and Clockface.
- This site along with Omega won't help St Helens meet its air quality targets
- Levels in Burtonwood are already a problem and would get worse with the proposed development.
- Resident in Warrington asthma has got worse since Omega and this would make it worse.
- Pollution from HGV's goes against section 14 of the NPPF
- This does not match with the governments stated objectives on reducing carbon emissions in line with those of the international fraternity.

6. POLICY

6.1. Relevant planning policy is the following:

- St Helens Core Strategy Policy CP1: Ensuring Quality Development;
- National Planning Policy Framework (2019) ("NPPF"), paragraphs 103, 170 and 181
- The National Planning Practice Guidance ("NPPG"): Air Quality

7. ASSESSMENT

7.1 Paragraph 181 of the NPPF states 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 (AQMA) 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.

- 7.2 The NPPG advises that the 2008 Ambient Air Quality Directive sets legally binding limits for concentrations in outdoor air of major air pollutants that affect public health such as particulate matter (PM₁₀ and PM_{2.5}) and nitrogen dioxide (NO₂).
- 7.3 As well as having direct effects, these pollutants can combine in the atmosphere to form ozone. Odour and dust can also be a concern, for example, because of the effect on local amenity.
- 7.4 Poor air quality can have health impacts, as reflected in the EU Limit Values referred to above. The Limit Values are annual mean concentrations of 25ug/m³ (micrograms per cubic metre) for PM_{2.5} and 40ug/m³ for both PM₁₀ and NO₂. The annual mean should be applied at locations where members of the public might be regularly exposed to, such as the building facades of residential properties, schools, hospitals etc. If the pollutant level is below the EU Limit Values then it is largely regarded that there is an acceptable impact on health.
- 7.5 The NPPG states that air quality may be relevant to a planning decision if the development is likely to have an adverse effect on air quality in areas where it is already known to be poor, particularly if it could affect the implementation of air quality strategies and action plans and/or breach legal obligations (including those relating to the conservation of habitats and species).
- 7.6 Policy CP1 of the Core Strategy requires new development to minimise and mitigate against the effects of air pollution, smells and dust. Development that is located within or would impact on AQMA's will require special consideration with regard to their impacts on air quality.
- 7.7 Overall the proposed development would cause some harm to air quality in certain locations, which must be weighed against the proposed development. However, the proposed development would not cause any exceedances of EU Limit Values in 2030 or have a significant effect overall. Accordingly, the proposed development would comply with the relevant sections of policy CP1 and the NPPF.

8. CUMULATIVE EFFECTS

- 8.1 Each chapter of the Environmental Statement also considers the cumulative effects of other developments. Of these other developments, there is Omega South (Zone 3-6) which has outline planning for 1100 residential units and a mixed-use zone and Lingley Mere which has permission for a residential development. These are considered across all areas in the Environmental Statement.
- 8.2 In terms of the cumulative effects, the EIA identifies that there would not be significant effects in relation to noise and vibration, air quality, ground and contamination, drainage, flood risk and biodiversity.

9. OVERALL SUMMARY AND CONCLUSION ON AIR QUALITY

- 9.1 The proposed development would cause some harm to air quality in certain locations, which must be weighed against the proposed development. However, the proposed development would not cause any exceedances of EU Limit Values in 2030 or have a significant effect overall. It is not considered that this materially conflicts with policy CP1 in the Core Strategy or paragraph 181 of the NPPF because impacts have been minimised and mitigated. However, harm would be caused and this harm should be given very limited weight against the proposed development.