

Consultee	Category	Response
Rethinking Warrington's Future	3.1	<p>We welcome recognition of the negative impact that poor air quality continues to have upon the health of Warrington's population, particularly the young and the old.</p> <p>It is reassuring to see WBC planning to work collaboratively with the health service to better understand the impact on health through the JSNA.</p> <p>We would hope that this improved understanding would lead to increased action as we are disappointed to see that many planned actions in the previous 3 years annual air quality status reports have not progressed, or that planned actions are acknowledged to make only a small contribution to reducing air pollution e.g. cycling.</p>
Rethinking Warrington's Future	3.2	<p>We are extremely concerned that whilst you have acknowledged the potential construction of 23,000 new homes and 381 ha of employment land there is no sense that doing anything more than essentially carrying on with existing measures (other than constructing new roads) will be required.</p> <p>Given that in your 2017 annual status report you state that increasing traffic volumes will be an ongoing challenge to improve air quality we believe that you need to be more imaginative and bold in the steps you propose to take.</p> <p>In addition, we cannot understand why you are producing this report at this point given that you will either be publishing a redrafted PDO and/or draft local plan during 2018. At which point this work will be less relevant.</p> <p>We feel it essential that you undertake and publish the impact such development will have on increasing the miles driven on Warrington's roads, this is particularly pertinent given that this has risen from 1,150,000 to over 1,350,000 in the last 15 years. Without such an assessment, we fail to see how you will be able to develop a robust and sustainable air quality strategy.</p>
Rethinking Warrington's Future	3.3	<p>We note that by 2013 cars in Warrington accounted for 90% of distance driven whilst contributing 61% of NO<sub>x</sub> whilst buses despite only accounting for 1% of distance travelled contributed 11% of NO<sub>x</sub>.</p>

		<p>Given your stated intention to try and increase use of public transport across the borough and the fact that due to lack of funding you have now ceased your Ecostars fleet recognition scheme we are intrigued to know how this would be achieved, especially since you are not responsible for procuring the vehicles used by bus companies.</p> <p>Of further concern here is the continued rise in the contribution made to poor air quality by cars (petrol and diesel) since the early 2000s, this despite the improvements in engine efficiency and less polluting fuels.</p>
Rethinking Warrington's Future	3.4	<p>We are appalled to see the scale of the reduction levels required for each of the AQMA areas as these emphasise the challenge faced by the town if the health of it people and its attractiveness as a place to live and work are to improve.</p> <p>We are pleased to see that you have recognised that potential improvements in industry and technology are not expected to significantly improve air quality.</p> <p>Thank you for acknowledging that predicted growth plans will need to be taken into account. We believe it essential that the contribution all your proposed actions will make towards improving air quality are properly quantified and measured overtime.</p> <p>This is currently a significant omission from your consultation document.</p>
Rethinking Warrington's Future	4.2	<p>We are pleased to see the formation of a Programme Board to oversee the development and implementation of the AQAP. We would urge you to include senior professionals from local NHS bodies and experts in air pollution prevention and management as standing members all appear to have policy rather than specific expertise in this area.</p> <p>It is heartening to see that public health is taking a lead in this process but a significant omission is that there is no reference to the NICE guidance about Air Pollution: outdoor air quality and health as this contains many evidence based recommendations that are starkly absent from your consultation document.</p> <p>We question the seriousness of your commitment by the very fact that you propose that the Programme Board will meet at least annually and suggest this should be at least quarterly with a</p>

		<p>requirement to measure implementation, its impact upon air quality and clear demonstration of action taken to address any shortfalls.</p>
<p>Rethinking Warrington's Future</p>	<p>Table 5.1</p>	<p>It is helpful to see the action plan measures laid out in a single table although unfortunately this highlights the many deficits.</p> <p>The key weakness of this plan is that your Key Performance Indicators are at too high a level, extremely general and infrequently measurable.</p> <p>Comments like "Plan in place, Document Produced, Journey times, Number of Users" are completely meaningless. These need to be considerably more detailed, measurable, monitored and reported clearly to the people of Warrington. E.g. Journey times between Wilderspool Causeway and Gemini will be reduced by 25% from their current average by 2020, or, the numbers of people cycling to their place of work from home using the new cycle network will increase by 30% by 2022.</p> <p>We note that many of your proposed actions are currently unfunded and question how they can be realistically included in this plan.</p> <p>We are extremely surprised and disappointed to see that in regard to the proposed western link further modelling work, with an air quality assessment need to be undertaken. We fail to see how this essential assessment has not been completed given the scale of Warrington's air quality problems and that WBC has pushed this proposed route through.</p> <p>It is similarly disappointing to see that so much of your plan relies upon more roads to improve air quality particularly as given the point above we have no confidence that you have properly assessed the contribution you proposed actions will have.</p> <p>We note that you are not expecting cycling schemes or your intelligent transport system to contribute significantly to air quality improvements.</p>

		<p>We are interested to see your proposals re the Warrington Western Rail link and would be glad to hear to what extent the rail companies are going to match this new facility with additional capacity on the trains as at peak times these services are already significantly oversubscribed.</p>
<p>Rethinking Warrington's Future</p>	<p>5.1</p>	<p>We note your comments about Warrington's poor infrastructure and would agree but reject your current apparent commitment to relying upon more roads as your prime solution to improving air quality.</p> <p>We welcome the idea of Warrington seeing a step change in urban transportation but find it very disappointing to see that you feel it is road infrastructure that is required to address pollution and unlock development sites rather than anything more innovative e.g. urban tram systems as introduced by Edinburgh, Nottingham and Sheffield in recent years. In terms of unlocking development sites we can only presume that this is some form of code for accessing greenbelt land away from the town centre.</p>

		<p>How disappointing to see no reference in your document to the fact that Warrington's rural landscape, including greenbelt, is already contributing to improving air quality and that if your local plan removes this asset it will be a double blow for air quality.</p> <p>We recognise that the swing bridges, when they open in peak times, cause delays, but question your emphasis on this as a "major" contributor to the town's poor network resilience.</p> <p>It would be helpful if you were to provide data to show the frequency and times of opening of the swing bridges in every 24 hour period for a 12 month timeframe so that their true impact can be seen and before they are "blamed" for the town's problems. Perhaps linked to this it would be very helpful to see whether the operation of the swing bridges actually has any impact on the movement of traffic in the whole AQMA.</p> <p>We welcome the suggestion that you are exploring the feasibility of air quality modelling linked to traffic data to evaluate a number of scenarios but are astounded that, given the extent of Warrington's problems, that this has not been completed prior to the plan being developed.</p> <p>Given how WBC faces the same funding constraints as all other LAs it is disturbing to see that staff resource from across the organisation to review all policies and procedures has yet to be allocated and we would therefore question the reality of this intention to conduct a policy review.</p>
Rethinking Warrington's Future	5.1.1	<p>We note your 5 bullet points.</p> <p>We are somewhat perplexed by the statement that the local plan will assess any air quality impact, which may require air quality modelling to be carried out and would welcome clarification of what this actually means in practice.</p> <p>In the same way we would welcome clarification about that your bullet points actually mean and how you intend to go about delivering them.</p> <p>E.g please explain what reducing the need to travel means? Does this mean more people will be encouraged to work from home?</p> <p>Please define what constitutes a suitable location for land allocation for development.</p>

		<p>Please define what a high quality built environment consists of and how this is assessed. Please define a green infrastructure. Does this mean trees or is it greenbelt, if not why not?</p>
<p>Rethinking Warrington's Future</p>	<p>5.1.2</p>	<p>We are encouraged by your reference to more sustainable transport for the town. We note that your own reports on the take up of existing cycling schemes and routes has been disappointing and are unclear how simply having more of these will contribute to improving air quality.</p> <p>We would urge you to look at the evidence about how to make these initiatives more successful and suggest that working with local employers to provide appropriate facilities for cyclists and their bikes would be a useful place to start.</p> <p>This lack of progress to date is all the all the more disappointing since plans to increase cycling have been referred to in the Council's annual air quality reports for the last 5 years and little progress appears to have been made.</p> <p>We are very pleased to see the suggestion that a Public Transport Strategy will be developed to make public transport a more attractive choice for the people of Warrington. It is not clear who you have come to the decision that providing more real time information and improving vehicles, subject to funding, would achieve this.</p> <p>We suggest that, particularly for those residents that live on the more rural edges of the town, the reduction in use of public transport is more to do with the lack of a regular and reliable service.</p> <p>We suggest that prior to developing your strategy you undertake a comprehensive survey of your council tax payers as we are certain they will tell you what the problems are.</p> <p>We are disappointed that your consultation document makes no reference to the notion of developing an integrated transport system that links public and private solutions together more effectively e.g. aligned bus and train timetables.</p> <p>It would be helpful to understand what steps WBC can actually take to ensure alternative fuel sources etc will be used.</p>

		<p>We are encouraged to see your ideas about encouraging the use of electric vehicles and cleaner fuels and would be interested to see the result of any analysis you have undertaken to show that these would be of interest to the local population.</p> <p>It would have been more encouraging however had you included some numbers in this section e.g. current numbers of electric vehicles, targets for an increase in numbers over the next 5 years and quantification of the types of incentives you might offer. Free parking, reductions in council tax?</p> <p>We like the use of the phrase “Smarter Choices’ but given the information you have provided in your consultation document are none the wiser. We think it would be helpful if you could please explain what this actually means.</p> <p>Re your proposed Taxi Strategy, we would agree that “every little helps” but would have been better reassured if you had set some measurable targets around your ideas.</p>
Rethinking Warrington’s Future	5.1.3	We are alarmed to see that your current supplementary planning document was adopted 4 years ago and does not reflect new guidance. We hope that with the recent approval of housing developments on the HCA land then developers are being expected to follow current guidance and not rely on an out dated council document.
Rethinking Warrington’s Future	5.1.4	We welcome moves to procure low emission vehicles and the use of weighting during tender processes. We note the requirement for staff resource and assume that this will be given the appropriate priority.
Rethinking Warrington’s Future	5.1.5	Given the scale of the actions that will be needed to tackle pollution generated by vehicles on local motorways and within the town itself we question whether diverting resources to revisit smoke control will make sufficient contribution to justify the idea of such a review and would suggest it should be a low priority.

		<p>If more housing is to be built we suggest that actions to reduce the impact of refuse collection, emissions from homes and employment facilities and increased numbers of vehicles on the roads would be more useful.</p>
Rethinking Warrington's Future	5.2.1	<p>It is encouraging to see moves to work with together with others to agree appropriate actions to tackling Warrington's poor air quality</p>
Rethinking Warrington's Future	5.2.2	<p>It will be very useful to have a system which monitors journey time on key corridors and hope that such monitoring will be throughout the 24-hour period, including peak times, term times etc.</p> <p>The ability to provide the public with real time data will be appreciated but we would be interested to see the evidence about how this will drive driver behaviour. E.g. will some drivers postpone journeys or are they simply more likely to alter their routes and find alternatives to get around obstructions, as is regularly seen when the motorway network is gridlocked.</p> <p>You suggest this is called route choice optimisation please explain how you believe this will work in practice and in particular could you please quantify how this will improve air quality.</p>
Rethinking Warrington's Future	5.2.3 5.2.4	<p>The health benefits of cycling are well known and it is positive to see mention of cycling and walking links.</p> <p>It would be helpful to see clear targets around increasing the numbers of cyclists and people who opt to walk.</p> <p>We would welcome clear information about how you will achieve behaviour change on the scale required to impact upon air quality.</p>
Rethinking Warrington's Future	5.2.5	<p>Efforts to improve use of public transport are welcome.</p> <p>We would be keen to see the evidence that people who live close to the proposed Warrington west station currently drive into, or through the town, on their way to work.</p>



		<p>We would be concerned that, despite the current crowding on trains to Liverpool and Manchester, an additional station may simply encourage more people to commute out of the town to jobs in the two major conurbations.</p>
Rethinking Warrington's Future	5.2.6	<p>We are concerned that the approval of the City Centre Masterplan, which contains 3 new highway infrastructure projects to tackle congestion, has been given approval by the council without the essential air quality modelling necessary to understand whether or not they will have the desired impact on reducing pollutants.</p> <p>We note your comments that these developments are predicted to improve air quality and would value the opportunity to see the methodology used to make these predictions.</p>
Rethinking Warrington's Future	5.3.1	<p>A significant part of the WBC PDO was predicated on the need to increase employment in the town. Whilst much of this seemed to rely upon unskilled warehouse type jobs we would hope that regeneration of the town centre would include attracting higher paid skilled posts, particularly as this may encourage our younger residents to stay in the town.</p> <p>We are pleased to see that you propose to commission a study about the potential of a Workplace Parking Levy but would have significant concerns that this would be disincentive for companies, unless you are innovative in the benefits that would be offered to the workforce and the employers, e.g free travel passes.</p>
Rethinking Warrington's Future	5.3.2 – 5.3.5	<p>We note your proposals in this section, which appear to be at an early stage and remain largely unfunded.</p> <p>We would be interested to see how you have concluded that they are likely to help improve the air quality in Warrington.</p>
Rethinking Warrington's Future	5.3.6	<p>We welcome your proposals to measure PM<sub>2.5</sub> in addition to existing monitoring and would support allocation of funds to achieve this.</p>

Rethinking Warrington's Future	Appendix C	<p>As with table 5.1 we are disappointed to see how poor the Key Performance Indicators you have elected to select to monitor your ongoing actions are.</p> <p>Statements such as “Delivery of Programme”, “Delivery of Schemes,” “ When 2 of the proposed schemes have been completed” etc are not KPIs. We would want you to develop KPIs that not only assess actions but also set quality standards and aspirational improvements for the Town.</p> <p>We note in point 7 you talk about a TPT upgrade and wonder how this is linked to the PDO plan to build a road along it?</p> <p>We are pleased to see your proposal to offer “free to use training for cyclists” but feel that the 20 schemes per annum stated, and the absence of funding, is unlikely to have any impact upon air quality in the town.</p> <p>We were sorry to see that the number of staff in post at the LA who can provide work place travel advice has been reduced by 50%.</p>
Rethinking Warrington's Future	General	<p>Whilst we are pleased to see that Warrington has produced a draft Air Quality Action Plan our overall assessment is that it contains many inconsistencies, is very general, demonstrates that WBC has taken key strategic decisions around new infrastructure projects without all of the necessary facts about their impact upon Air Quality (positive or negative) and has failed to set specific, measurable and realistic targets for many of your proposed actions.</p> <p>We would suggest that you take some time to produce a better informed an higher quality plan before you commit to significant investment in infrastructure.</p>

We would like a reply to this response. Please send your reply to the Grappenhall and Thelwall Parish Offices care of Rethinking Warrington's Future