

**THE HIGHWAYS ACT 1980
-and-
THE ACQUISITION OF LAND ACT 1981**

**THE HIGHWAYS (INQUIRIES PROCEDURE) RULES 1994
COMPULSORY PURCHASE (INQUIRIES PROCEDURE) RULES 2007**

REFERENCE: LAO/NW/SRO/2013/40 and LAO/NW/CPO/2013/41

REBUTTAL PROOF

-of-

James McMahon in relation to the Proof

of

Mr DM Westbrook, 203 Chester Road, Poynton, Stockport, Cheshire, SK12 1DS

The Metropolitan Borough Council of Stockport

acting on its behalf and on behalf of

-Manchester City Council -and-

Cheshire East Borough Council

**to be presented to a Local Public Inquiry on the 30th September 2014 to consider
objections to**

**THE METROPOLITAN BOROUGH OF STOCKPORT (HAZEL GROVE (A6) TO
MANCHESTER AIRPORT A555 CLASSIFIED ROAD) COMPULSORY PURCHASE
ORDER 2013**

**THE METROPOLITAN BOROUGH OF STOCKPORT (HAZEL GROVE (A6) TO
MANCHESTER AIRPORT A555 CLASSIFIED ROAD) (SIDE ROADS) ORDER 2013**

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The Metropolitan Borough Council of Stockport

Corporate and Support Services

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This rebuttal proof of evidence sets out the Council's response to the objector's proof in relation to their objection to the A6 to Manchester Airport Relief Road Compulsory Purchase Order and/ or Side Road Order that was submitted to the Department for Transport by Mr DM Westbrook.

This rebuttal proof is presented by the Council's Project Director for the A6MARR scheme. James McMahon, however, contributions to this rebuttal have been made by the Council's Expert Witnesses as indicated alongside the responses.

The Expert Witnesses contributing to the responses to the objections submitted are as follows:

Expert Witness	Initials	Proof of Evidence Name and Reference Number
James McMahon	JMcM	Volume 1
Naz Huda	NH	Volume 2
Nasar Malik	NM	Volume 3
Paul Reid	PR	Volume 4
Paul Colclough	PC	Volume 5
Jamie Bardot	JB	Volume 6
Alan Houghton	AC	Volume 7
Sue Stevenson	SS	Volume 8
James McMahon	JMcM	Volume 9
Henry Church	HC	Volume 10

A plan showing the relevant land contained within the order(s) is shown at Figure 1.

Objector 25: Mr DM Westbrook
 203 Chester Road, Poynton, Stockport, Cheshire, SK12 1DS

Element of objector proof	Objection	Response	Expert Witness
25-R01	<p>With no junction between the A6MARR and this Woodford Road, I am concerned that the volume of traffic using Woodford Road may not reduce and that the Proposal is not addressing the accident black spot/traffic problems at the junction where Woodford Road meets with Chester Road. It should be noted that in recent years I have witnessed a number of serious accidents at this junction requiring attendance by the emergency services. The chances are that there have been many other incidents that I have not noticed.</p> <p>At the Meeting it was stated that road safety issues at this junction are the responsibility of CEC and that according to the traffic model, volumes along Woodford Road will significantly reduce as a result of the scheme but those on Chester Road will increase irrespective of the A6MARR going ahead. Overall, I am still concerned that the Proposal is not taking the opportunity to address this accident blackspot.</p>	<p><u>Junction Option</u> Following public consultation the preferred junction option for this location was for the relief road to travel under a new bridge at Woodford Road, Poynton. 54% of respondents stated their preference for this option (9% for the alternative to create a signalised staggered junction).</p> <p>The construction of the A6MARR approved design provides a better alternative route to some of the traffic currently using Woodford Road. The omission of a junction along Woodford Road means that this traffic joins and leaves the A6MARR at the most appropriate junctions east and west of Woodford Road. Providing a junction along Woodford Road would attract additional traffic along Woodford Road seeking to access the A6MARR at the Woodford Road Junction. Woodford Road is not of a suitable standard to accommodate this increased traffic (and the associated environmental impacts) and therefore the decision was made to not provide a junction on Woodford Road.</p> <p>The proposed scheme will result in a significant reduction in traffic flows along Woodford Road without any noticeable change in traffic volume along Chester Road. This will mean that there is significantly reduced conflict at the</p>	NH/NM

		<p>existing junction and this should improve the safe operation of this junction. The introduction of a traffic signal controlled junction with the proposed Chester Road link will mean that traffic moves in platoons, creating gaps for vehicles at the Chester Road/ Woodford Road junction.</p> <p><u>Existing Accident Data at Chester Road / Woodford Road Junction</u> Collision data provided by CEC then between the period 01.08/2009 to 31/07/2014 indicates that there were a total of 5 reported 'collisions', resulting in 7 casualties (6 slight and 1 serious)</p> <p>The 'default' COBA combined link and junction accident rate for an 'older S2 A Road' with a 30/40 mph speed is 0.844 'personal injury accidents / million vehicle kms' - this junction is reporting a pia/mvkms of 0.598 based on the info supplied for the last 5 year period.</p> <p>This indicates that the A5149 Chester Road / Woodford Road junction actually has a lower incident / collision rate (for reported incidents) when compared to the 'default' COBA value for a junction of this type and is therefore not considered to be an 'accident hotspot'.</p>	
25-R02	a) My proposal (see embedded sketch) should reduce the number of accidents at the intersection of Woodford Road and Chester Road which surely should be an aim of the A6MARR Proposal. As there is already decelerating and accelerating traffic noise and standing traffic air pollution at this	<p>The layout suggested by the objector was drafted by the Council and is indicated within the drawings A6MARR-2-C-01-300-SK-004 P0 and A6MARR-2-C-01-300-SK-005 P0 (Appendix A)</p> <p>The drawings indicate the following features;</p> <ul style="list-style-type: none"> • The approach angles of the signalised junction with angles of intersection appear to measure less than 70° off plan. The Design Manual for Roads and 	NH

	<p>junction, my proposal would be to make it a traffic light junction and run the access road to the A6MARR from this traffic light junction rather than have a new junction and link with Chester Road a few hundred yards up the road westwards towards Woodford.</p> <p>If my proposal was adopted, for traffic wishing to join the A6MARR, it would take westbound traffic off Chester Road sooner reducing noise and air pollution to a number of properties. Only a limited amount of traffic wanting to join the A6MARR should travel eastbound along Chester Road as only a few households down from the proposed junction it would be quicker for them to travel westwards and join at the Bramhall junction.</p> <p>At the meeting the Council view was that the new junction as currently planned provides a higher capacity junction than could be provided at a junction between Woodford Road and Chester Road.</p> <p>It should be noted that my proposed junction has potential to be high capacity as: -</p> <p>i) there is already a right hand turn lane for Woodford Road for traffic travelling west along Chester Road</p>	<p>Bridges (TD 50/04) highlights a number of inherent problems associated with angles of intersection less than 70°, these are;</p> <ul style="list-style-type: none"> ➤ priority may not be obvious to drivers; ➤ inter-visibility within the junction inter-visibility zone is adversely affected; ➤ undesirable high speed turning movements may be possible on the obtuse angles of the junction; ➤ difficulty in locating secondary signals satisfactorily. <ul style="list-style-type: none"> • Land take from nine properties on Chester Road and Woodford Road; • Five properties to access their driveways from within the junction itself; • Properties at 165, 167, 177 and 236 Chester Road would have limited access and egress due to the position of the necessary traffic islands; • The land take required is outside of the current CPO; • The design is out with the current planning consent boundary. <p>For these principle reasons the layout is deemed to be potentially unsafe, unduly impacting on private property and offering no advantages to the design of the scheme by the Council.</p> <p>Further points to note regarding the design:</p> <ul style="list-style-type: none"> • Subject to further 3 dimensional design, further private and commercial land (Electricity North West 'ENW' Substation) /properties could be affected by this alternative; • The ENW substation could require diversion increasing the construction cost of the works; 	
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	<p>ii) there is room to introduce 2 lanes at the end of Woodford Road & also Chester Road travelling east wards before you get to Woodford Road</p> <p>iii) the link road can also have 2 or more lanes approaching the junction</p> <p>If my proposal is adopted, the amount of land to be purchased as a result of the scheme should be no more than the Proposal and could be less because some or all of i) and ii) above can be achieved on land already owned by the Councils and because there should be scope to use some of the existing footprint of the existing access road to the Oil Terminal. A possible fringe benefit could be the use of a drainage ditch proximate to the north east of my proposed route.</p> <p>b) My proposal should also improve the general flow of traffic, compared with the A6MARR Proposal, by not introducing a new junction a few hundred yards westwards up Chester Road towards Woodford. Under the A6MARR Proposal, at busy times of day, it is easy to predict that the traffic will build up eastwards on Chester Road from the link road traffic lights all the way back to the junction with the Woodford Road, making it very difficult to get out of Woodford Road on to Chester Road.</p>	<ul style="list-style-type: none"> • Environmental impacts would have to be considered potentially requiring earth bunding that would increase the land take further; • Operational assessment of the junction would determine whether the a) the junction operates is within capacity b) whether further land is required to bring the junction within capacity c) or the junction is not viable on traffic modelling grounds. <p>The Council considers that the layout is not viable for the following reasons:</p> <ul style="list-style-type: none"> • The inherent safety risk associated with the skew angles on the approach arms; • The addition land required over and above the current CPO proposals; • The requirement for vehicles to access residential driveway form within the junction; • The limited access to driveway afforded, beyond the above mentioned properties; • The layout is out with the current planning consent boundary. • The layout may not be feasible on traffic grounds. <p>It is proposed by the council that no further investigation should be carried out relating to this alternative suggested by the Objector.</p>	
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	<p>The A6MARR Proposal introduces a right angle bend with new traffic lights on to part of Chester Road where the traffic has flowed satisfactorily for many years. From a safety point of view I would have thought that the geography of the Proposal should still give priority to the traffic flowing down Chester Road not the traffic leaving the Relief Road and should also slow the traffic down leaving the A6MARR so it gets used to being on ordinary main roads.</p> <p>At the meeting the council agreed to look at a layout to give more priority to the existing Chester Road. They have contacted me recently to say they are still working on this layout.</p> <p>c) My proposal should reduce the amount of noise and air pollution for the overall Proposal.</p> <p>ci) Currently at certain times of day there are long queues of traffic waiting to come out of Woodford Road onto Chester Road. This would be the same if the A6MARR Proposal goes ahead as currently proposed but in addition there will be more stationary traffic a few hundred yards westwards up the road towards Woodford, leading to increased amounts of air and</p>		
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	<p>noise pollution.</p> <p>cii) At the same time, my proposal could lead to less overall environmental impact on the farmers fields</p> <p>d) Cheshire East has gone to considerable lengths to remove traffic lights in the centre of Poynton Village. The A6MARR Proposal introduces new traffic lights, not far up the road from the centre of Poynton Village. When we moved into the area 20 years ago the plan for the Relief Road gained access purely by roundabout and there were no traffic lights. However as the Proposal now introduces traffic lights at this point, it should be noted that my proposal will not increase the overall number of traffic lighted junctions in the A6MARR Proposal.</p>		
25-R03	<p>2) I would also make the point that if the A6MARR Proposal goes ahead as currently planned there appears to be considerable landscaping for noise bunding to the west of the access road from Chester Road to the A6MARR. When the PRR goes ahead it appears to go to the west of this bunding possibly making this nugatory work.</p>	<p>In 2003-2004 we consulted on the 'SEMMMS road schemes' which linked the M60 in north Stockport with Manchester Airport, via Hazel Grove and Poynton, and included the Poynton Relief Road.</p> <p>The current A6 to Manchester Airport Relief Road scheme is the first phase of the wider SEMMMS Relief Roads Scheme. Stockport and Cheshire East remain committed to delivery of the whole scheme subject to further funding being identified. The Poynton Relief Road was the subject of a recent consultation undertaken by Cheshire East Council.</p>	NH

		<p>The proposed A6MARR/ Chester Road junction has been designed in liaison with Cheshire East Council to accommodate any future tie-in with the Poynton Relief Road. The design also takes into account the site location of the bunds proposed as part of the A6MARR construction works.</p>	
25-R04	<p>3) I would also like to point out that access to my property is listed as being affected by the A6MARR Proposals but the Proposers have not been able to tell me how access to my property will be attained. At the 9th May meeting SMBC indicated that the appointed contractor would contact me on this and that the existing 2 vehicular accesses would be maintained. As yet the contractor has not contacted me further.</p>	<p>It is noted that access into 203 Chester Road can be made via a choice of two driveways. A suggested layout of a standard driveway including the provision of dropped kerbs on Chester Road and the access road off Chester Road is indicated within the plan in Appendix B.</p> <p>During the Detailed Design Stage of the scheme where the contractor's design team will interrogate and determine more accurate design levels associated with the carriageway and the footways directly outside the Objector's property the Contractor will contact the Objector to discuss design options.</p> <p>During construction the Council's appointed contractor will liaise with the Objector when it is necessary to block access to the driveways temporarily. This liaison will seek to ensure that disruption during the works is kept to a minimum.</p>	NH
25-R05	<p>4) It was stated at the Meeting that the Proposal is a joint council approach, Bearing in mind that there is considerable work associated with this part of the Proposal which is on the border of CEC and SMBC boundaries and taking into consideration the points above re accident</p>	<p>Cheshire East Council is one of the three promoting authorities for the A6MARR scheme and they have been involved as part of the project team structure and governance throughout the course of the scheme development. Cheshire East Council has representation on the Programme Board and officers at senior levels are involved in the decision making processes and design</p>	JMcM

	<p>rates at the junction of Woodford Road and Chester Road and noise bunding there appears to be a lack of co-ordination between the two parties. It strikes me that to make sure that proper discussion takes place between them, the A6MARR work should not go ahead independent of the go ahead to the Poynton Relief Road scheme.</p>	<p>development, as well as appropriate agreements that have been drawn up across the 3 promoting authorities.</p> <p>The design of the scheme has been carried out by the lead designers at Stockport Metropolitan Borough Council but also with liaison with the Highway and Network Managers of Cheshire East Council, Manchester City Council and Stockport Metropolitan Borough Council.</p> <p>SMBC on behalf of itself and the two partnering authorities are seeking confirmation of the Orders in order to construct the A6MARR scheme as part of the overall SEMMMS Strategy. The A6MARR caters for the future construction of the Poynton Relief Road in terms of construction works and traffic flows.</p> <p>Cheshire East Council is currently promoting the Poynton Relief Road Scheme and have recently carried out Public Consultation.</p>	
25-R06	<p>5) The Councils are to be thanked for providing alternative options for the junctions on the bypass. However whilst these options were being developed there appears to have been little involvement with the Public. It is only fair to say that the Public have had the opportunity to vote for their preferred option and local meetings have been held on the Proposal. However the Public's concerns do not seem to have been introduced into the Proposal and having attended meetings and written to</p>	<p>The public has been able to comment on all aspects of the scheme during the public consultation period and throughout the preliminary design stage of the scheme.</p> <p>The suggestion to realign the Chester Road link to connect at the junction at Woodford Road was noted in the feedback from the Phase 1 Local Liaison Forum held 23rd January 2013 which was made publicly available as part of the Phase 1 Consultation Report (available on the scheme website). The design team were in attendance at the Local Liaison Forums to provide an opportunity for direct dialogue with the most directly affected residents and</p>	SS/ NH

	<p>both Councils there has been little response to my points.</p>	<p>consider their suggestions. It is not correct to say that the concerns of local residents have not been introduced into the proposals; design changes in the area as a result of the consultation include:</p> <p>The Council has met with the objector on 9th May 2014 and 25th September 2014. Two alternative layouts were developed by the Council that were suggested by Mr Westbrook –</p> <p>1) <u>EI008 Chester Rd Re-alignment Option 2 (A6MARR -2-C-01-300-SK-002 P0) – (Appendix C)</u></p> <p>The layout, as suggested by the objector has been drafted in order to investigate the implications of this alternative. The layout incorporates the following design conditions:-</p> <ul style="list-style-type: none"> • Equivalent traffic operational capacity at the junction to the approved design; • Creation of an access road to 191-209 Chester Road (potentially to 211 Chester Road also). <p>The disbenefits of this layout are as follows:-</p> <ul style="list-style-type: none"> • The scheme requires additional private land outside the current CPO extents (1575sq m); • The extent of works on Chester Rd extends to additional properties (173-181); • The layout is out with the current planning consent boundary; • The potential disturbance from the junction on the residential properties on Chester Road is approximately the same. This is pertinent to the Objectors' concerns regarding the proximity of the junction stop/start movements and associated 	
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		<p>pollution.</p> <p>2) <u>EI 30 Chester Road Link Option 3 (A6MARR-2-C-01-300-SK-006-P0) (Appendix D)</u></p> <p>This layout is an interpretation of a further suggestion from the objector. It retains Chester Road as the major arms (Eastern and South Western Arms) and the link to the A6MARR on the minor arm (north west) of the signalised junction.</p> <p>The layout incorporates the following design conditions:</p> <ul style="list-style-type: none"> • The option remains with the currently proposed CPO extents; • The option remains within the current planning consent boundary; • To ensure that the residential driveways of the various houses on Chester Road an access road is included to 205, 207, 209, 211, 213, 215, 217 Chester Road. <p>The layout creates the following disbenefits:</p> <ul style="list-style-type: none"> • The layout requires the realigned Chester Road to travel on an alignment that requires a departures from standard (DMRB TD 9/93 Table 3) and as described on the drawing; • The junction location is in effect brought closer to the residential properties of Chester Road when compared to the approved design; • It is questionable that the junction will operate satisfactorily from an operation perspective (traffic <p>For these primary reasons no further investigation is</p>	
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		<p>proposed for the layout option and the Council considers the layout as not a viable option.</p> <p><u>Conclusion</u></p> <p>In conclusion it is the Council's view that the approved scheme provides a satisfactory junction and link between the A6MARR and Chester Road. The alternatives layout suggested by the Objector, as the Council has interpreted them, provide several disbenefits:</p> <ul style="list-style-type: none">• Involve junction layouts that contain inherently unsafe geometry (DMRB);• Require various Departures from Standards that the approved scheme does not;• Encroach on private garden frontages;• Encroach on more private land;• Are outside of the current CPO boundary and;• Outside of the current planning consent boundary. <p>These disbenefits are not associated with the approved design and therefore the alternatives layouts have been discounted.</p>	
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Figure 1: Land within the Order(s)

