

**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**

**Mrs Joanna Hulme, 53 Beechfield Road, Stockport, Cheshire, SK3 8SX**

**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 30<sup>th</sup> 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**

**Parveen Akhtar**

**Head of Legal and Democratic Governance**

**The Metropolitan Borough Council of Stockport**

**Corporate and Support Services**

**Town Hall, Stockport SK1 3XE**

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 Mrs Joanna Hulme.

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:

<b>Expert Witness</b>	<b>Initials</b>	<b>Proof of Evidence Name and Reference Number</b>
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

<p>Objector 57: Mrs Joanna Hulme  53 Beechfield Road, Stockport, Cheshire, SK3 8SX</p>			
Element of objector proof	Objection	Response	Expert Witness
57/R01	<p>It will cut through greenbelt land, leading to ribbon development on countryside which has been protected from development for a very good reason: to stop the urban sprawl of the Greater Manchester conurbation.</p>	<p>The concept of a relief road in the area has been around since the 1930's, is well documented in the 1960's and the Highways Agency has protected a route for decades. Specific plans for a Relief Road have been around since 2001 when the South East Manchester Multi-Modal Strategy (SEMMMS) recommended that the three councils work on developing plans for improving transport in the area for the benefit of both local communities and the local economy.</p> <p>It is acknowledged that the scheme represents inappropriate development in the Green Belt and as such needs to show that 'very special circumstances' exist to overcome this objection. In granting planning permission the Local Planning Authorities have considered this issue and have concluded that the overriding benefits of the scheme provide sufficient weight to satisfy this test. The Secretary of State has not called the scheme in on Green Belt (or other grounds). The scheme will not lead to ribbon development.</p>	AH
57/R02	<p>Landscape that has taken many years to evolve will be totally destroyed. The Environmental Scoping Report of 3<sup>rd</sup> February 2010 states that "Parts of the corridor retain a strong sense of their relationship to the agricultural landscape</p>	<p>The Environmental Statement has investigated predicted impacts on the agricultural landscape and visual intrusion of the proposed scheme.</p>	PR

	of the Cheshire Plain” (4.4.4) and that “Whilst the visual quality of the open space and countryside within the corridor is variable, it constitutes a local resource which adds value to the environmental quality for the communities and individual residents located within and in the vicinity of the corridor” (4.4.7).		
57/R03	This scheme will have a detrimental effect on my quality of life, as I am a frequent user of the rights of way within the corridor. It is still possible to get a sense of tranquillity in the areas to be affected, in spite of conclusions to the contrary in an early environment assessment (encl).	The Environmental Statement has investigated predicted environmental impacts of the scheme including landscape character and visual impacts on Public Rights of Way (PRoW). PRoWs, including footpaths and bridleways along the proposed route will be affected by the construction of the scheme. It is a priority to minimise any disruption to PRoW and, where possible, to improve them. However, some routes will be diverted to ensure safe crossing points to the new road are created. PRoW diversions have been developed in consultation with the general public and by the Vulnerable Road User Group that was set up specifically for the scheme. It is accepted there are locations associated with ProW where there is a sense of tranquillity. There will be an impact on such locations where they will be close t o the proposed scheme.	PR
57/R04	It will cause destruction and possible deterioration of ancient woodland, namely Carr Wood, I believe the Woodland Trust has objected to the scheme for this reason.	The proposed scheme involves the loss of 0.08ha of a total of 2.3ha of ancient woodland at Carr Wood. It is acknowledged the National Planning Policy Framework notes that:  planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged	PR

		<p>or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss;</p> <p>It is, therefore, the responsibility of the relevant planning authority to determine if there is such a case where a development will involve loss of ancient woodland. The loss of ancient woodland was specifically addressed in the officer report to the Cheshire East Council planning committee prior to the committee's decision to approve the application. The approval by committee in light of the information made available is a clear indication it was concluded the need and benefits outweigh the small-scale loss in this instance.</p>	
57/R05	<p>It is being brought in piecemeal, with part of the road already built, which, in my opinion, has been done in order to reduce the potential opposition. This, in my opinion, is disingenuous. If this road is completed, it will lead to more congestion and calls for previous discontinued schemes to be reinstated, such as the link to the M60 through the beautiful Goyt valley and the Disley bypass. The SEMMMS final Report of 2001 concludes that "constructing only one or two but not all of the A6(M), the Poynton Bypass and MALRW to the design previously proposed would simply amplify the existing traffic related problems experienced in the Hazel Grove, Poynton, Woodford, Bramhall, Handforth and Heald Green areas, the areas depending on the combination of schemes".</p>	<p>The South East Manchester Multi-Modal Strategy is a 20 year strategy covering an area to the south east of Manchester including parts of Cheshire East, Derbyshire, Stockport and Tameside local authority areas.</p> <p>In 2003-2004 the Council 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.</p> <p>Traffic forecasts showing the impact of the A6MARR are included in the Transport Assessment Report for the scheme. Figure 9.6 of this report presents on a map based diagram the traffic volumes on roads across the scheme area for three scenarios: a) 2009 flows; b) 2017 forecast</p>	JMCM

		<p>traffic flows without the A6MARR; and c) 2017 forecast traffic flows with the opening of the A6MARR. The plan shows roads that have a decrease or an increase of more than 5% in traffic volume and those roads that have a flow change of less than 5% as a result of the construction of the A6MARR which illustrates that the scheme will result in a reduction in traffic along the A6 and in local centres including Gatley, Bramhall, Heald Green, Hazel Grove, Poynton, Wilmslow, Handforth and Cheadle Hulme.</p> <p>It is recognised that the scheme will result in traffic increases in a small number of areas and the Council has sought to keep such traffic increases to a minimum. Where increases in traffic levels approximately in excess of 5% have been identified, a range of traffic mitigation strategies and measure have been included to address any potential impacts that may arise.</p>	
57/R06	It will cause an increase in traffic on the very minor roads on which I cycle, as motorists try to find an alternative way to reach the new road, avoiding the A6 through Disley and High Lane, which will become even more congested than it is now.	The modelling confirms the attraction of the A6 with traffic reassigning from the surrounding alternative route network, mainly B roads south and west of the A6. The effect of the introduction of the enhanced mitigation measures is for some of the traffic that would have reassigned to the A6 continuing to use this B road network. Therefore there is no indication that traffic will increase on the “very minor roads”.	NM
57/R07	In terms of access to the airport, it is not needed: there are enough ways to get to the airport already. There are frequent trains and buses to the airport, and the new Metrolink tram line to the airport is	Specific plans for a Relief Road have been around since 2001 when the South East Manchester Multi-Modal Strategy (SEMMMS) recommended that the three councils work on developing plans for improving transport in the	JMcM

	<p>due to open quite soon. The airport is also already served by the existing motorway network.</p>	<p>area for the benefit of both local communities and the local economy. Throughout each stage of the SEMMMS scheme, detailed assessments have been undertaken to analyse the need for the proposed Relief Road. Results identified the following main reasons for the development of the A6 to Manchester Airport Relief Road:</p> <ul style="list-style-type: none"> <li>· Relieve existing traffic congestion and address poor connectivity which constrains the economy through lengthening journey times. Current congestion reduces labour market catchments and business-to-business activity as well as creating delays on designated freight routes (e.g. the A6) which, in turn, generates productivity losses for businesses;</li> <li>· Address the current poor access to/from the east to Manchester Airport which acts as a barrier for economic growth and regeneration;</li> <li>· Improve the existing poor transport links in communities throughout south Manchester in particular relating to the east-west highway network;</li> <li>· Relieve current congestion on current roads, where average peak time vehicle speeds of less than 10mph have been recorded on many parts. This congestion has led to journey times that are longer than all other 'large' urban areas across the UK, including those in London;</li> <li>· Reduce existing trips using residential streets as well as passing through local centres which will in turn reduce levels of pollution, road traffic incidents and journey times;</li> <li>· Relieve current congestion problems along the A6 and in local centres including Gatley, Bramhall, Heald Green, Hazel Grove, Poynton, Wilmslow, Handforth and Cheadle Hulme which currently affect accessibility</li> </ul>	
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		<p>and lead to delays;</p> <ul style="list-style-type: none"> <li>· Improve existing poor environmental conditions in local communities caused by the high volumes of traffic passing through the areas to reach other destinations; and</li> <li>· Relieve currently congested conditions for pedestrians and cyclists which results in non-motorised transport users facing problems of safely accessing education, employment and leisure facilities.</li> </ul> <p>The existing motorway network and new tramline referred to by the objector do not facilitate the east to west transport link that the proposed will provide.</p>	
57/R08	It will result in an increase in traffic in the long run, when we should be trying to find alternatives to providing for ever-increasing traffic, and when more people are choosing other options like train travel and cycling.	<p>In itself the proposed A6MARR scheme will not in itself lead to an “increase in traffic in the long run” as referred to in the evidence of Mr Malik Proof of Evidence Volume 3/1. The SEMMM Strategy is multimodal. All three local authorities are committed to delivering the strategy in full. Over the last ten years since the completion of the SEMMMS study, approximately £63 million has been spent on SEMMMS projects. Appendix L of the published scheme business case gives a summary of progress against the SEMMMS study recommendations and this is reproduced below, supplemented with some more detailed examples of the projects implemented.</p>	JMcM
57/R09	Even back in 2001, in the SEMMMS Final Report of that year, it was noted that “The results of the survey have shown that a strategy with the majority of expenditure on non-road travel has achieved overwhelming support. It has also showed that even more expenditure in this area would be supported” (9.49). For the current scheme, I do not think that the	<p>69% was in response to the Phase 1 consultation (late 2012/early 2013) question asking whether the respondent was in support of the A6MARR scheme.</p> <p>The consultation on the South East Manchester Multi Modal Study in 2000 asked the following questions. The questionnaire contained three questions about transport in South East Manchester:</p>	



	published figure of 69% of overall respondents supporting the proposals, during the first phase of the consultation process, constitutes a large enough endorsement.		
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