

Rebuttal Proof regarding aspects of the proposed development

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(Chair PAULA residents group)

In relation to the Public Inquiry
into the A6 to Manchester Airport Relief Road Proposals

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1) In Mr Colclough's rebuttal of our AQC report (50/2/010), and at the Inquiry, he contradicted the assessment shown in table 8.9 of the ES that the scheme increased the length of road in exceedance by more than 1%. When I questioned him on this contradiction at the Inquiry he said that the table was incorrect and he maintained that the scheme did not increase the length by more than 1%.

Table 8-19 Compliance Risk Assessment Outputs

Compliance Descriptors (Flow Chart in Annex A)						Outcome		
Compliant Zone ID	A - Change (increase) greater than 1% of EU LV	B- Does the Scheme cause a compliant zone to become non-compliant?	C - Delay Defra Compliance?	D- Does the Scheme Increase Change in Road Length that Exceeds	E - Does the scheme worsen air quality overall? (in exceedance)	If the answer to A,B,C or D is Yes Proceed to AQAP (Annex C)	AQAP effective?	Compliance Risk Rating (High / Neutral / Low)
UK0033	YES	NO	NO	YES	YES	N/A	N/A	Low
UK0003	NO	NO	NO	NO	NO			
Summary	YES	NO	NO	YES	NO			

ES Table 8.9 -showing in column D, that the scheme increases length of road in exceedance by greater than 1%.

2) The guidance used by the applicants, IAN 175/13 (now apparently withdrawn) says that if B, C, D or E are answered in the affirmative the applicants would have to demonstrate the effectiveness of the Air Quality Action Plan (IAN175/13 par. 2.6).

3) Mr Colclough has presented several alternative assessments for Disley which show varying numbers of residences that are brought into exceedance by the proposed road. In the ES it is three receptors but he has since indicated a more realistic model predicts 11 and other models up to 23 receptors. It was not clear at the Inquiry if all these predictions are within the 1% limit.

4) Despite column E also being marked as 'Yes' no attempt has apparently been made by the applicant to demonstrate an effective AQAP and therefore prove there is only a 'low risk' of the scheme being non-compliant with the EU Air Quality Directive. We think this is a massive deficiency in the application.

5) In Mr Colclough's rebuttal to my own evidence dated 9th October he states that the background NO2 level at Queensgate School is 20ug/m3 (50/RR05). This is not consistent with the analysis given to the parents and local MP when the parents association demanded a meeting with the SEMMMS team in February 2013 after assessments were published showing a raised risk of pollution local to the school. (See appendix 1) Mouchel's analysis shows only 12ug at the school facade and 11.9ug at the boundary fence nearest the road. No predicted or measured value would be less than the background level. Also 20ug is very high for this greenbelt setting. For example, the background for the much more urban area around Stepping Hill is 16.17ug/m3.

6) It is therefore likely that Mr Colclough quotes this 20ug value in error and it does not show that my calculation of the exceedance near the road is necessarily incorrect.

7) If on the other hand, Mouchels now believe their estimates for the school were incorrect they should make good their errors and inform the school.

8) Mr Colclough suggests there is no public access 4m from the kerb opposite Spath Lane East Caravan site (50/RR06) and therefore no requirement to meet the hourly limit value/objective.

9) I was not trying to demonstrate a breach at this particular location, but more to draw attention to the very real possibility of widespread breaches of the hourly limit value near the road along the whole length of this particularly busy section between the A34 and the A5102.

The proposed cycle path passes well within 4m from the kerb for a significant lengths and would be subjected to high levels of NO₂. There is as a consequence a high risk of non compliance with the Directive.

10) There is a strong case therefore that there is a high risk of non compliance with the Air Quality Directive along the A555. Moreover this will worsen further if a Phase 2 completes the connection to the M60.

Summary

- a) There is still uncertainty concerning the increase in road length with exceedences caused by the proposed road and consequently, whether or not the applicants will need to develop an Air Quality Action Plan for Disley.
- b) The 20ug/m3 background NO2 level for Queensgate School quoted by Mr Colclough in his rebuttal and at the Inquiry is inconsistent with other estimates for the school.
- c) This evidently doubtful value for background NO2 does not therefore invalidate the calculation of hourly exceedences near the road.

Air Quality Assessment

Assessment Process

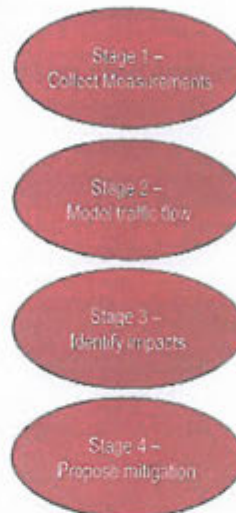
As part of the Planning Application the Environmental Impact Assessment will assess the change in air quality when compared to EU levels and targets. This will be undertaken using background data collected from monitoring locations on Woodford Road and Albany Road for the key parameters of Particulate Matter (PM₁₀) and Nitrogen Dioxide (NO₂).

Indicative Assessment

Air quality on Albany Road at present is good and within EU levels which sets an annual average of 40µg/m³ for both NO₂ and PM₁₀.

Our experience of working on similar schemes shows that emissions from roads rapidly fall to background concentrations as you move away from the road.

Our studies have also identified that air quality at Queensgate School will still be within EU levels should the scheme be given consent at both the façade and boundary of the school.



	NO ₂ µg/m ³ (annual average)		PM ₁₀ µg/m ³ (annual average)	
	Façade	Boundary	Façade	Boundary
Without Scheme	12	11.9	13.2	13.1
With Scheme	15.3	19	14	14.9
Difference	+3.3	+7.1	+0.8	+1.8

Therefore, we do not expect any breach of standards should the scheme be constructed.



Fig 1: Location Plan

Source; handout from SEMMMS team to parents at Queensgate School meeting, February 2013