

**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**

THE HIGHWAYS ACT 1980

-and-

THE ACQUISITION OF LAND ACT 1981

THE HIGHWAYS (INQUIRIES PROCEDURE) RULES 1994

COMPULSORY PURCHASE (INQUIRIES PROCEDURE) RULES 2007

Certificate application pursuant

to

**Section 19 of the Acquisition of Land Act 1981 in respect of land at Woodford
Road, Bramhall, Stockport and Moored Golf Course, Bramhall, Stockport**

WITNESS STATEMENT OF

Nazrul Huda

B.Eng C.Eng MICE

on behalf of

The Metropolitan Borough Council of Stockport

acting on its behalf and on behalf

of

Manchester City Council

-and-

Cheshire East Borough Council

VOLUME 3 – SUMMARY PROOF

Local Public Inquiry – 30th September 2014

1. Introduction

1.1 I, Nazrul Huda, am giving evidence on behalf of the Metropolitan Borough Council of Stockport on its behalf and on behalf of Manchester City Council and Cheshire East Borough Council by virtue of an Agreement entered into between the three partnering Authorities pursuant to Section 8 of the Highways Act 1980. I have read the Statement of Case; I am therefore aware of the broad case advanced to promote the aforementioned Orders

1.2 I Nazrul Huda, hold a B.Eng Honours Degree in Civil Engineering from the University of Manchester which I attained in 2001. I am a Chartered Engineer and I am a member of the Institution of Civil Engineers having attained my professional qualification in 2007.

2. Section 19 Application

2.1 This Summary Proof outlines in summary my Proof of Evidence which provides justification and argument in support of the –

The Metropolitan Borough of Stockport (Hazel Grove (A6) to Manchester Airport A555 Classified Road) (Side Roads) Order 2013 and

The Metropolitan Borough of Stockport (Hazel Grove (A6) to Manchester Airport A555 Classified Road) Compulsory Purchase Order 2014

2.2 Included in the Compulsory Purchase Order is land forming part of the Woodford Recreation Ground, Bramhall, which is currently used as public open space and is needed to facilitate A6MARR (the "Order Land"). Because of the inclusion of public open space the Compulsory Purchase Order will be subject to special Parliamentary procedure unless the Secretary of State for Communities and Local Government (the "Secretary of State") issues a certificate in accordance with the provisions of Section 19 of the Acquisition of Land Act 1981 (the "S.19 Certificate Application") that the Secretary of State is satisfied and prepared to certify that under section 19(1)(a) of the Acquisition of Land Act 1981, the Secretary of State is satisfied that there has been or will be given in exchange for the Order Land an area of other land (the "Exchange Land"), which is not less in area and is equally advantageous to persons, if any, entitled to rights of common or other rights, and to the public and that the Exchange Land has been or will be vested in the persons in whom the Order Land was vested and subject to the like rights, trusts and incidents as are attached to the Order Land

2.3 The Order Land is described in the First Schedule to my Proof and the Exchange Land is described in the Second Schedule. The Order Land comprises an area of land measuring in the whole 7,442 square metres which forms part of the Woodford Recreation Ground, Bramhall and which is currently used for public recreation. This part of the Woodford Recreation Ground will be needed for the construction of the exit slip road heading east on the A555 as it approaches Woodford Road, Bramhall, although it has been possible through design refinement to reduce the extent of the loss of open space in order to maintain the use of existing football pitches located nearby. This loss of the Order Land is proposed to be replaced with the Exchange Land measuring 16,722 square metres, which is located approximately 250 metres east of Woodford Road and bounded by the A6MARR and the rear of properties along Albany Road, Woodford.

3. Woodford Recreation Ground, Woodford Road, Bramhall, Stockport

3.1 The existing recreation ground is used for a variety of purposes. There are four football pitches, a cricket pitch (currently used on an ad-hoc basis during the summer), a skate ramp and changing rooms.

4. Consideration of Exchange Land

4.1 Various sites were assessed to accommodate the Exchange Land. The function of the recreation ground was largely able to be retained and therefore the objective was to determine land that could be used for recreational walking and jogging and other informal uses. The site would require the following statutory and scheme objectives to be met:

- Be (at least) of equal size;
- Be equally advantageous to the public
- Be equally accessible;
- Minimise the impact of the land take on any prospective land owner.

4.2 The design team ruled out various alternative sites before determining the land south of Albany Road to be the most appropriate.

5. Objection

5.1 One objection to the S.19 Certificate application was received from Squire Sanders (UK) LLP of Trinity Court, No 16 John Dalton Street, Manchester M60 8HS on behalf of Mr and Mrs Peter Holmes of Moorend Farm, Woodford Road, Woodford, Stockport. A copy of the objection dated the 23rd May 2014 is appended to my Proof as Appendix 5.

5.2 On the 20th August 2014 the objectors replied to the initial comments by the Council and a copy of the letter from Squire Patton Bogg (UK) LLP for the objectors is appended to my Brief as Appendix 6. The further points of objection largely replicated the points of objection already made or otherwise sought clarification but which have been taken into account in the preparation of the Proof.

6. Conclusion

6.1 The Council has explained in its response to the objection why the whole of the Exchange Land is needed to enable the environment and ecology of the Exchange Land to be improved so that the Exchange Land will not just provide an equally advantageous replacement area of public open space but will enhance the amenity of the open space, especially for the benefit of the nearby residential estate with an opportunity for more recreational activities to be carried on the Exchange Land than is currently possible on the Order Land being lost to A6MARR.

6.2 I therefore consider the Application for a Certificate pursuant to S.19 of the Acquisition of Land Act 1981 to be wholly justified and respectfully request that the Secretary of State for Communities and Local Government grants the Certificate accordingly.