



**TRANSPORT AND WORKS ACT 1992  
TRANSPORT AND WORKS (INQUIRIES PROCEDURES)  
RULES 2004**

**NETWORK RAIL (STALYBRIDGE TO DIGGLE  
(SADDLEWORTH) ENHANCEMENTS) ORDER**

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**REBUTTAL PROOF  
RELATING TO PROOF OF EVIDENCE OF JOHN WALTON  
(OBJ/260) SUBMITTED ON BEHALF OF THE RAMBLERS  
ASSOCIATION**

*Prepared by:*

*Keith Gardner: Construction*

*Lee Barraclough: Moorgate Halt Level Crossing – Engineering &  
Design of the Alternative Route (including consideration of  
footbridge)*

|                    |                           |
|--------------------|---------------------------|
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| Author             | Network Rail              |
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## 1. INTRODUCTION

### 1.1 Introduction

1.1.1 This rebuttal proof is providing Network Rail's responses to the Proof of Evidence submitted by John Walton on behalf of the Rambler's Association (OBJ/260) which comprises:

- Proof of Evidence (**PoE-OBJ-260.1**)

1.1.2 The rebuttal is limited to points which it will assist to address in writing. The fact that any point is not responded to does not mean it is accepted.

## 2. NETWORK RAIL'S REBUTTAL EVIDENCE

### 2.1 Rebuttal Evidence of Keith Gardner: Construction

2.1.1 There appears to be a misconception in Mr Walton's evidence that the railway line will be closed for 20 weeks. My understanding is that the 20-week period refers to the overall timeframe during which track access will be sought, rather than a continuous closure. At this stage, and this far in advance of delivery, confirming the exact access arrangements would be challenging. The construction of a footbridge, therefore, needs to be assessed in terms of potential access, with risk allowed depending on the access granted.

2.1.2 There is no link between works which would be required to construct a footbridge at Moorgate Halt and the construction of Oldham Road Bridge, and again, there is no 20-week closure of the railway line. As I explain in the my evidence there will be a 17-week closure of Oldham Road Bridge, but this does not mean that the railway will be closed throughout this period.

2.1.3 Road Rail excavators and other road rail plant, such as excavators, elevated platforms, dumpers etc can access the track by means of the road rail access points and travel to the worksite at walking pace. Rail Cranes however, access the works by means of rail locomotives and require train plans from their previous work locations. These items of plant are scarce and need to be booked a long way in advance. Even then, there is always a risk that access for a specific time is granted, but the rail crane is elsewhere (eg. track renewal or emergency works such as derailment).



Figure 1: Kirow crane with a locomotive and trailers

2.1.4 Within the costs assessment for a footbridge at Moorgate Halt, the working assumption is that the scheme would utilise a potential 16-day blockade, together with three 54-hour weekend possessions. Given the scale of works associated with a footbridge in this location, a number of additional Rules of the Route possessions (weekday or weekend nights) would also be required to undertake enabling and finishing activities.

## 2.2 Rebuttal Evidence of Lee Barraclough: Moorgate Halt Level Crossing – Engineering & Design of the Alternative Route (including consideration of footbridge)

### Introduction

2.2.1 This section is providing Network Rail's responses to the following matters raised in Proof of Evidence (PoE-OBJ-260.1)-.

- **Matter 1 – Comparison of engineering & design constraints between Moorgate Level crossing & other sites in the order.** There are detailed in Appendix 1 to 5 of PoE-OBJ-260.1
- **Matter 2 – Alternative proposal for the east support of the 2022 Footbridge.** This is detailed in Appendix 8A.1 of PoE-OBJ-260.1

### Response to Matter 1

2.2.2 Appendices 1 to 7 of John Walton's evidence identify the types of construction activities associated with a number of schemes included within the Order and suggest that similar activities could be applied to the construction of a footbridge at Moorgate Halt level crossing.

2.2.3 My proof of evidence [NR/PoE/LB/11] paragraphs 4.4.10 to 4.4.40 states the engineering and design constraints at Moorgate. I conclude that *'The challenging location at Moorgate Halt has meant that the cost estimate exceeds programme level benchmarks compared to comparable projects due to several design constraints and the method driven cost due to its remote location.'*

2.2.4 In my opinion, the overall engineering and design constraints should be assessed on a site-specific basis in order to make a reasonable and meaningful comparison between schemes.

2.2.5 In the following section, I review the principal constraints associated with the schemes discussed in Appendices 1 to 7 and compare them with those relevant to the 2022 Moorgate Footbridge proposal as identified in PoE-OBJ-260.1 .

MVL3/10a Lower Beeston (Appendix 1 of PoE-OBJ-260.1)

2.2.6 At optioneering stage for MVL3/10a it was recognised at vehicular access to the site was good due to the proximity of Manchester Road and Lower Beeston. See Figure 2.

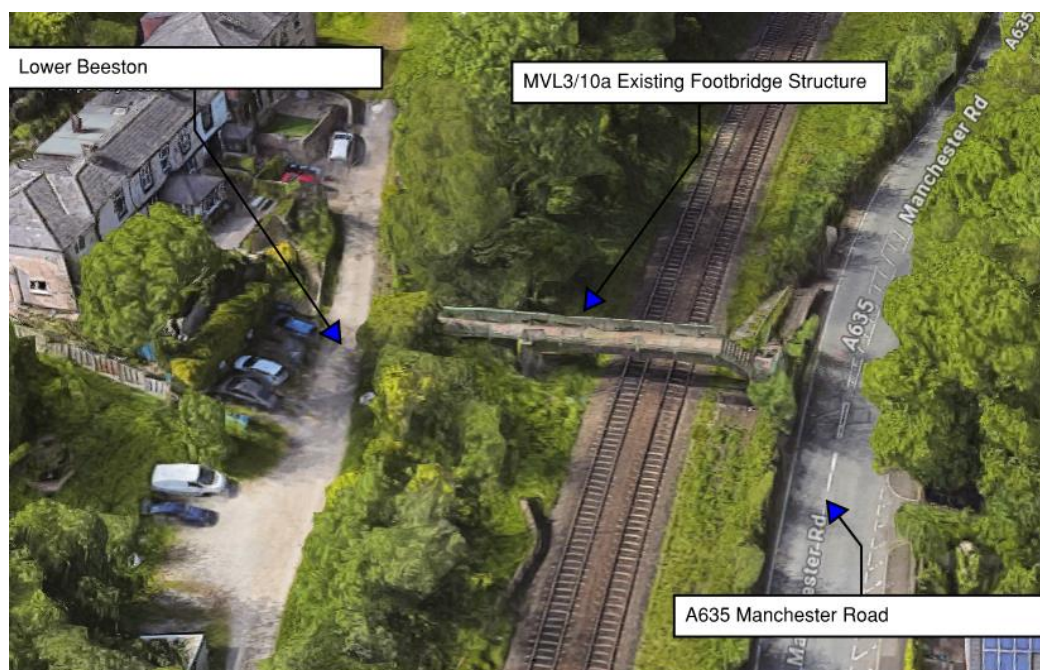


Figure 2 View of MVL3/10a Site Location

2.2.7 The existing footbridge will be replaced a single-span steel footbridge and staircase based on the Network Rail standard details.

2.2.8 MVL3/10a is like the 2022 Footbridge considered at Moorgate Level Crossing in that new foundations are required for a footbridge. However, the proximity of the adjacent roads significantly simplifies the design and construction of the foundations at MVL3/10a in comparison to the 2022 Footbridge.

2.2.9 At MVL3/10a the existing bridge superstructure will be removed from a crane located in Manchester Road. This will allow the new foundations to be constructed.

- 2.2.10 On the Lower Beeston side, the foundation will be comprised from piles and an in-situ concrete bank seat. As the new foundation is set back far enough from the railway, all construction activities can be carried out during daytime working without a closure of the railway. Materials and plant can access the site from the adjacent Lower Beeston.
- 2.2.11 On the Manchester Road side, the new foundation will be compromised from a new in-situ concrete spread foundation. As the new foundation is set far enough back from the railway, all construction activities can be carried out during daytime working without a closure of the railway. A lane closure of Manchester Road, adjacent to the bridge, is required during construction of the foundation. All material and plant can access the site from the lane closure.
- 2.2.12 At MVL3/10a the new bridge would be delivered by road and lifted into place from a crane located on Manchester Road.
- 2.2.13 At MVL3/10a the foundations can be constructed during daytime working without closure of the railway, and the new bridge can be delivered and lifted from the adjacent Manchester Road.
- 2.2.14 To build a footbridge at Moorgate Halt requires all materials and plant to be delivered via the railway and all activities, including foundations and bridge installation, completed during closure of the railway.
- 2.2.15 Therefore, in my opinion, the engineering and design constraints associated with MVL3/10a and those relating to the 2022 Moorgate Footbridge proposal are not reasonably comparable.

The image contains two architectural elevation drawings of a stone bridge.

### Existing Elevation A-A

**Scale 1:50**

This drawing shows the existing state of the bridge. It features a central archway flanked by two smaller openings labeled "Standedge" and "Stalbridge". The bridge is constructed from stone masonry. Callouts include:

- Existing stonework parapet wall and plasters with stone copings
- Existing stonework arch with stone abutments and foundations
- Existing stonework abutting course
- Existing coursed stone approach walls with stone copings
- Existing stonework retaining wall
- Existing stonework abutment

A dimension line at the bottom indicates a width of 9094.

### Proposed Elevation C-C

**Scale 1:50**

This drawing illustrates proposed modifications to the bridge. The central archway and side openings are highlighted in blue. Callouts include:

- Retained stonework masonry piers and supporting stringcourse
- Natural cut stone transition coping
- Natural cut stone size and joint arrangement to replicate existing
- Proposed bridge structure feature line
- Concrete deck
- Natural cut stone cladding precast to external elevation
- Proposed R/R beam concrete bridge with natural cut stone clad parapets and natural cut stone coping
- O/E filings cast into underside of precast beams (inductive)
- Reinforced concrete d/I beam
- Natural cut stone faced outside face. Colour r and joint arrangement matching retained mass
- Natural cut stone masonry cheek walls with precast concrete coping
- Natural cut stone clad precast floor units
- Rebuilt coursed stone approach walls with re-used stone copings
- Can seat
- Rail seat slip Pt
- Stone masonry retaining walls rebuilt behind the units
- Concrete r/f's on lower precast floor unit to support stonework
- Existing stonework abutment cut down and re-used below pedestrian level and re-used
- Rear of all unit drainage

### Figure 3 Proposed and Existing elevation of MVL3/20

2.2.17 Retaining the existing abutment and approach walls significantly reduces the overall works at the site. It also eliminates the risk of unknown ground conditions.

2.2.18I completed the design and supported the construction phase for a similar scheme called MVL3/34 Graville Street in Stalybridge. See Figure 4 which

shows the retained arch abutment with the new bridge superstructure. The bridge components were delivered along the track and lifted into place using a rail crane, see Figure 5.



Figure 4 MVL1/34 Granville Street - Example of the reuse of an existing arch abutment



**Figure 5 MVL3/34 Granville Street - Example of rail crane lifting bridge superstructure into position**

2.2.19 At MVL3/20 although the site requires components to be delivered along the railway from Oaklands Road, the reuse of the bridge abutment & approach walls significantly limits construction activities to installation of the new bridge components.

2.2.20 To build a footbridge at Moorgate Halt requires new foundations to be constructed with the associated risk of unknown ground conditions.

2.2.21 Therefore, in my opinion, the engineering and design constraints associated with MVL3/20 and those relating to the 2022 Moorgate Footbridge proposal are not reasonably comparable.

*MVL3/23 Wrights Overbridge (Appendix 3 of PoE-OBJ-260/193/259.1)*

2.2.22 At optioneering stage for MVL3/23 it was recognised that the bridge was in a remote site with no vehicular access. This constraint would have resulted in a higher than benchmark cost for a reconstruction of the bridge.

2.2.23 This was considered with other factors when deciding that the preferred solution was removal of the structure.

2.2.24 Removal of the structure can be completed from track level with spoil transported along the track to Oaklands compound. Demolition is a significantly simpler operation than reconstruction.

*Rebuttal Proof to the Proof of Evidence of The Ramblers Association (OBJ/260)*  
*(NR/PoE/REB/OBJ/260)*

2.2.25 Therefore, in my opinion, the engineering and design constraints associated with MVL3/23 and those relating to the 2022 Moorgate Footbridge proposal are not reasonably comparable.

*MVL3/28 Oldham Road Overbridge (Appendix 4 of PoE-OBJ-260/193/259.1)*

2.2.26 MVL3/28 will be reconstructed using a 5-day closure of the railway and a 17-week closure of the highway.

2.2.27 MVL3/28 reconstruction is a complex scheme which has been developed to minimise impact to highway users, no works which could have the potential to affect the progress of MVL3/28 would be carried out in parallel.

2.2.28 Therefore, is no link between the construction of MVL3/28 Oldham Road and Moorgate Level Crossing.

*MVL3/29 Wickens Underbridge (Appendix 5 of PoE-OBJ-260/193/259.1)*

2.2.29 Appendix 5 of PoE-OBJ-260/193/259.1 states 'It is proposed to enhance the steps etc on path 244 but Network Rail have admitted - **There is limited access for machinery to the underside of the structure**'

2.2.30 Much of the upgrade works to FP244 involve resurfacing of the existing footpath. This would be carried out by a mini excavator and hand tools accessing from Oldham Road or the adjacent field.

2.2.31 The concrete steps would be cast in-situ using permanent formwork installed piecemeal by hand. Concrete would be delivered via Ladcastle Road.

2.2.32 Due to the nature of the works only limited small machinery is required.

*MVL3/31 Uppermill Viaduct (Appendix 6 of PoE-OBJ-260/193/259.1)*

2.2.33 The works to Uppermill Viaduct is the attachment of OLE structures to the outside face of the viaduct. It is a significantly different intervention to the installation of a new footbridge.

2.2.34 Therefore, in my opinion, the engineering and design constraints associated with MVL3/31 and those relating to the 2022 Moorgate Footbridge proposal are not reasonably comparable.

*Response to Matter 2*

2.2.35 The sketch provided for the alternative east support is not to scale or informed by a topographic survey.

**Rebuttal Proof to the Proof of Evidence of The Ramblers Association (OBJ/260)**  
**(NR/PoE/REB/OBJ/260)**

2.2.36 I reference [NR/PoE/LB/11.9] which shows the proposed alternative on elevation 'Ramblers Association OBJ 260 Alternative solution Elevation' to scale with the topographic survey.

2.2.37 The spread foundations specified for a footbridge would not be adequate at this location. Ground investigation at this location has identified that the structure would need to be piled due to made ground.

2.2.38 The retaining walls either side of the pad foundation (see figure 1, blue outline) do not represent a recognised engineering solution for retention. It does not appear to be a spread foundation or piled.

2.2.39 In my opinion the proposed engineering solution does not account for the poor ground condition and location partially down a slope.

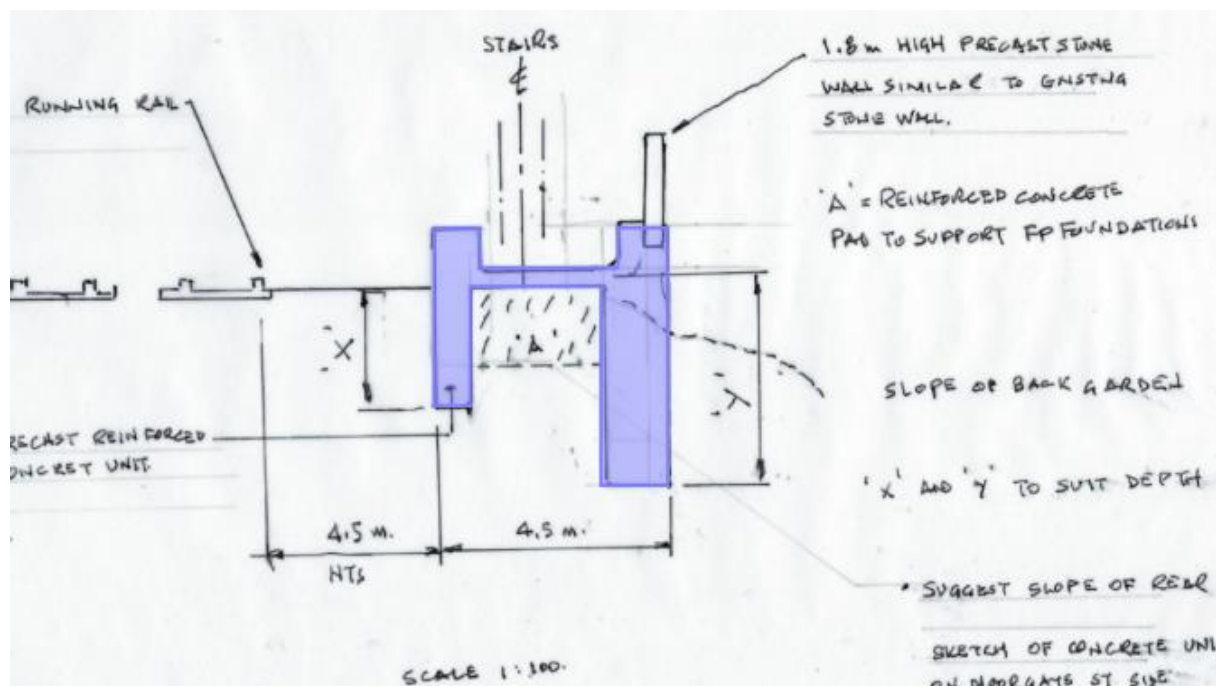


Figure 6 Extract from Appendix 8A.1

### **3. WITNESS DECLARATION**

#### **3.1 Statement of declaration**

Each named witness confirms that the declaration on their proof of evidence applies to the relevant parts of this rebuttal.