Proof Of Evidence

Summary

Moorgate Footbridge Campaign Group

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Objections 65 and 54

NETWORK RAIL STALYBRIDGE TO DIGGLE

TRANSPORT WORKS ACT ORDER

1.0 Introduction

1.01 My name is Leslie Harrison, and I have been a Chartered Civil Engineer since 1984.

1.01 From 1986 until 2010 I was employed by Oldham Metropolitan Borough Council as a senior consultant providing advice on all planning applications with highway/traffic implications.

1.02 During that period, I appeared at many Public Inquiries, giving evidence, as an expert witness, on highway/traffic matters.

1.03 Since retiring from the Council in 2010 I have been working on a part time basis as a private traffic consultant.

1.04 I have been asked to have a look at and make any appropriate comments on the proposal of Network Rail to divert the route of Public Footpath No 209. My evidence, therefore, relates specifically on the safety issues regarding the junction of Footpath 244 with Oldham Road,

2.0 Comments on Proposal to Divert Public Footpath N0 209

2.01 The Public Footpath links Ladcastle Road to Moorgate Street and crosses the railway line at an existing level crossing. Network Rail accept in their submission that the Footpath has a 'high level of usage'

2.02 Network Rail have submitted a Safety Risk Assessment (SRA) prepared by Mayer Brown. (Doc Ref NR88 September 2025)

2.03 The SRA is concerned only with the re-routing of pedestrians onto the highway network and the potential effect on road user safety in the vicinity. The question the SRA seeks to answer is whether the Activity of "re-routing pedestrians from the public footpath onto the adopted highway network is detrimental in road safety terms, to the existing situation"

2.04 Section 6 of the SRA outlines the Conclusions reached from the Assessment.

2.05 Paragraph 6.2 states 'The activity of re-routing additional pedestrians onto the A670 does require additional control measures to mitigate an increased risk level, because of the assumed additional pedestrian movements'

2.06 Paragraph 6.3 states 'It is assumed that there are currently very few pedestrian movements at the location of the narrow footway on the west side of the A670 and the level of footway occupancy will increase relatively significantly as a result of the closure of the level crossing and public footpath.'

2.07 Although the SRA uses the term 'relatively significant', this is a rather vague description, and from the figures taken from a census of the usage of the level crossing in documents submitted to Oldham Council and considered by the Highway Regulation Committee on 18th July 2024 should be more accurately described as 'highly significant', with the volume of users likely to be egressing the footpath onto the A670 at a very dangerous location without any significant additional safety measures being implemented.

2.08 Paragraphs 6.4-6.6 conclude that if the narrow footway on the A670 was widened and the location of the change of speed limit was moved, these mitigating measures would result in the greatest reduction in risk, however, just simply moving the location of the change of speed limit without a footway widening would 'retain the risk level at existing levels.'

2.09 I have visited the site, particularly the location of the junction of Footpath 244 with the A670 Oldham Road. Note: Oldham Road changes its name to High Street where the road crosses the Huddersfield Narrow Canal.

2.10 The A670 in Uppermill is one of the most the most heavily trafficked roads in the Saddleworth area, and it is also the route of many bus services.

2.11 Network Rail have conceded there will be a *significant increase* in pedestrian flow at this location, should their proposal to close the level crossing be approved, given their understanding that the footpath to be closed and diverted onto this new route has a '*high volume of usage'*.

2.12 As a pedestrian approaches the A670 from the footpath, to the right of the junction (south-westwards) there is no footway at all. To the left (north-eastwards) there is a very narrow footway of no more than 0.4 metres in width. Whilst it is possible that a pedestrian with great care could keep on this narrow footway, in all likelihood, given the significant increase in pedestrian movements, there will be many instances of pedestrians inadvertently stepping into the carriageway.

2.13 The SRA at Appendix A uses a 'Hazard Identification & Risk Assessment Matrix' to form its conclusion.

2.14 It identifies the hazard of a narrow footway and states; With additional pedestrians re-routed we consider the likelihood of collision would increase. However, it recommends this should be monitored by the Highway Authority. Firstly, there is no scope to widen the footway due to physical constraints and secondly it expects the Highway Authority to deal with the problem should accidents occur.

2.15 Appendix A also states; With additional pedestrians re-routed we consider the likelihood of collision would increase and conclude that reducing the speed limit on the A670 over a short distance from 30mph to 20 mph would increase the safety of pedestrians. Again, it is recommended this simply be monitored by the Highway Authority.

2.16 Network Rail, via Mayer Brown, have further submitted a Road Safety Audit (RSA), to supplement the SRA to consider the obvious highway safety dangers where Footpath 244 meets Oldham Road.

2.17 The RSA agrees that one of the problems is an insufficient footway width, but does, concede that due to land constraints it may not be practical to widen the narrow footway identified.

2.18 The RSA also makes recommendations based on '*only able-bodied pedestrians being able to use this section of the proposed alternative route'.* However, the survey I refer to in Paragraph 2.07 above, mentions a high number of users classed as vulnerable using the level crossing. Presumably vulnerable users identified in the survey would be expected to use the alternative route but do not appear to be considered in the RSA.

2.19 The recommendations of the RSA are:

a) the footway be widened if '*practical and cost proportionate'* and

b) if a) is not practical provide an advance warning sign to '*warn road users to anticipate pedestrians in the carriageway'.*

2.20 Firstly, with reference to the alteration of the Traffic Regulation Order to extend the speed limit for a short distance, is outside the control of Network Rail and secondly, I would suggest, would only have marginal implications, at best, for a pedestrian necessarily stepping into the carriageway at this location. Furthermore, the introduction of a single advance sign warning drivers of pedestrians in the road would not, in my opinion make this a safe area for pedestrians to negotiate the traffic hazards, particularly as it would appear the only safe place to erect such a sign is some 150 metres to the south-west of the junction of the Footpath with Oldham Road.

2.21 Moreover, there appears to be little or no consideration in the SRA and RSA of pedestrians who wish to turn right coming out of the footpath, in the south-westerly direction, and who would have to cross the carriageway at this location, where there are no crossing facilities. The nearest being some 40 metres to the north-east. This is a potentially dangerous situation at this location which has not been assessed. Users of the current footpath which Network Rail wish to close can use designated controlled crossing points to safely reach their destination in the westerly direction via the opposite footway. Human nature suggests that pedestrians will want to cross the road at this location, rather than going to the nearest safe crossing point.

3.0 Conclusion

3.01 The proposal to close the existing Footpath 209 and divert its route onto Footpath 244 would, in my view, have a detrimental effect on highway safety of its users. Insufficient mitigation measures could be implemented to overcome the safety issues highlighted.

3.02 Network Rail, through the SRA, accept the closure of Footpath 209 would significantly increase pedestrian movements on Footpath 244 and this would require 'additional control measures' to mitigate the existing risk level. But it is suggested in Appendix A of the SRA that the two suggested control measures i.e. footway widening and speed limit reduction, simply be monitored by the Highway Authority and, presumably, be introduced if necessary. However, no footway widening is possible due to physical constraints, and the introduction of a Traffic Regulation Order and an advanced sign would, at best, only give a marginal increase in safety.

3.03 Consequently, it is my opinion that the diversion of Footpath 209 onto Footpath 244 would directly lead to a highly significant number of pedestrians with a high number classed as vulnerable, at a location onto Oldham Road with significant obvious dangers to highway users, and should not, therefore, be pursued for highway safety reasons.

3.04 I would, therefore, respectfully request the application be refused.