

TWA 1992 NETWORK RAIL
STALYBRIDGE TO DIGGLE (SADDLEWORTH) ENHANCEMENTS ORDER

PROOF OF EVIDENCE

SAM AL-HAMDANI
REP 04

Proof of Evidence TWA STALYBRIDGE TO DIGGLE (SADDLEWORTH)

Sam Al-Hamdani (Saddleworth Parish Council) REP 04

1. I am presenting this proof of evidence in my role as a Saddleworth Parish Councillor, and the vice chair of the Parish Council's Strategic Planning Committee.
2. Saddleworth Parish Council (SPC) met with Network Rail on May 12 to discuss our initial statement of case, and their response. A number of assurances were given, however, at the time of submitting this Proof, those assurances have not been received, and therefore we have had to include all of these. The affected items are Diggle Access; the compounds at Armit Road, Friezland Church Hall car park, Saddleworth Rugby Club car park, and the carriageway off Oldham Road between Greenfield Station and Chapel Road. Should written confirmation of the positions be received, we would be happy to treat them as common ground; however, we would now ask that the Public Inquiry consider including these as conditions of the TWA order.
3. However, no agreement could be found on a substantial number of issues, such as the A670 closure, Moorgate Halt, the land off Ladcastle Road, some of the objections to the use of the land adjacent to Uppermill Viaduct, and the provision of new facilities and services.
4. In particular, with regards to the consideration of the footbridge at Moorgate Halt, the failure to even address the concerns raised, never mind provide an explanation or rebuttal, seems so extreme that I struggle to see this as any attempt at negotiation in good faith.
5. With regards to the closure of the A670 our concerns remain that there appears to be no evidence provided to back up Network Rail's contention that there is no option to build a bailey bridge. We have been provided with no engineering analysis, cost analysis or any other documentation to demonstrate this, and there is no reference to it in the Traffic and Transport Proof of Evidence NR/PoE/JD/CC/5.2. Indeed, the proof of evidence simply states that it will necessitate a 17 week road closure with no evidence to show that it is necessitated (paragraph 4.3.2).
6. While Network Rail stated in their consultation meeting that there were reserves available to work on the road network for improvements should it be needed, there was no information provided on how much was available, and what level of delays would result in that money being made available. The alternative routes in the area are extremely limited, and in most cases limited to single lane traffic due to their narrow nature and parking. I would contend that without guarantees to limit severe disruption to the local schools, businesses and commuter traffic, and to guarantee the availability of funding to remediate existing highways issues where these could mitigate the impact, agreeing the TWA order in its current

form is signing a blank piece of paper and hoping for the best, and is in breach of the proposed Saddleworth Neighbourhood Plan. Evidence is needed to demonstrate that there is not an engineering option to keep Oldham Road open for the duration, and guarantees are needed to ensure disruption is minimised.

7. On Moorgate Halt, the response given by Network Rail in both the formal written response, and the consultation meeting simply did not address in any way the points raised about the footbridge. Our only common ground is that we accept that the current level crossing is not safe as it stands.
8. Network Rail seemingly fully accepted the need to provide a footbridge at this location, having progressed all works to get planning permission in place for a footbridge.
9. The costings provided for the footbridge in the information provided to the groups with concerns over this location do not seemingly have any justification. Despite providing a clear analysis of why these figures did not justify the decision to cancel the footbridge project, Network Rail have simply ignored the questions raised.
10. The analysis of the safety of the Level Crossing at Moorgate Halt acknowledges both the high level of traffic at this point, but also the high proportion of vulnerable users who make up that traffic.
11. In considering the egress of PRow 244, Network Rail's contention is that should this egress prove to be unsafe once use has been established, this should be dealt with by highways. The High Street at this location is narrow, and providing a safer egress at this location would be a major engineering work, which would have no funding available to it. Demonstrably, this is creating a situation where vulnerable users would be at a much higher risk, and there would be no realistic proposition to resolve this.
12. The lack of a Diversity Impact Assessment for the use of PRow 244 throughout the consideration of this application simply adds to the evidence that this part of the application does not seem to have been carried out in good faith.
13. We note that in the Traffic and Transport Proof of Evidence NR/PoE/JD/CC/5.2, the author states that he has "*not [considered] whether the volume or type of users should be diverted and not [considered] the case for alternatives such as a footbridge*".
14. I cannot see how it can be acceptable that an Order can be put in place which would close a thousand year old right of way, disadvantage vulnerable people in the so doing, with no clear method of resolution, when there is an alternative which has been planned and accepted, is almost without exception agreed to by all objectors, and would not have a significant negative impact on the overall costings of the project.

15. The need for the compound at the Land at Ladcastle Road is predicated on the closure of PRow 209, and therefore should be treated in conjunction with that. Should the inquiry conclude that PRow 209 be retained via use of a footbridge then the requirement for this would be removed.
16. The Local Plan for Oldham states that the Oaklands Road compound contains within it a site of ecological importance. As not all of this area is to be taken up by the compound, we are awaiting evidence from Network Rail as to whether the area of ecological importance will be affected by the works. Should it be affected, we consider that a full and detailed plan of mitigation for this would be required before the TWA order is granted.
17. The use of the Land adjacent to Uppermill Viaduct is in a location where bats have been identified in the area. While the analysis of the site has not identified the location of bat roosts in the area being worked on, it has not identified the location of the roosts at all, which clearly must exist given the evidence of the bats. There is a risk that the absence of evidence is being taken as the evidence of absence. We would request that the inspector carefully assesses the statements provided by Network Rail to ensure that this Order does not threaten endangered and protected species.
18. With regards to the provision of accessible parking at the station, these works will provide disability friendly access to both sides of the station, a long-term goal of all parties including SPC. However, to be increasing access to the station at the same time as limiting accessible parking provision seems to be a contradictory approach. There are 11 parking spaces currently directly outside Greenfield Station. We consider that it would be appropriate for at least 4 to be given over for accessible parking, and 2 for families.
19. It was also the original contention of Network Rail that four named stations affected would have a drop off area, but this is now seemingly not part of the plans for Greenfield. We consider that this change at this stage to be a serious omission both from the public consultations, and from the final plans.
20. No agreement has been reached on the provision of additional train services at Greenfield Station as a result of these works. When considering any form of planning application, the job of those judging it is to consider the benefit delivered by the application and to contrast that to any adverse impacts.
21. Currently the works enabled by this TWA order would improve Greenfield station for those with accessibility needs – something required regardless of this work – but provide no extremely limited improvements for the wider population. Given this, I consider that it is essential for the disruptive elements of this scheme, both for the duration of the work (with particular reference to the closure of the A670), and permanently in the case of the closure of PRow 209, to be minimised or erased. This would mean clear limits on the disruption of traffic, guidance on the necessity of funding for mitigation should traffic problems exceed acceptable boundaries, and the provision of a footbridge at PRow 209.