



The Planning Inspectorate

THE NETWORK RAIL STALYBRIDGE AND DIGGLE (SADDLEWORTH)
TRANSPORT WORKS ORDER ACT (REF DPI/G4240/25/18)

Pre-inquiry meeting to be held at 10:00 on 17 April 2026

Microsoft Teams (virtual participation)

INSPECTOR'S PRE-INQUIRY MEETING NOTE

Introduction and purpose

1. The pre-inquiry meeting will be led by myself, **Matthew Woodward**, as the appointed Inspector. An agenda for the meeting has previously been circulated but it is also attached to this note (**Appendix A**).
2. The Programme Officer for the Inquiry is **Joanna Vincent**. Joanna works under my direction and is responsible for the administration of the inquiry and the inquiry website. Joanna's contact details are:
joanna.vincent@gateleyhamer.com
The inquiry website address is:
<https://gateleyhamer-pi.com/en-gb/stalybridge-diggle/>
3. The purpose of the meeting is to consider the ongoing management of the case and arrangements for the inquiries concerning the application for the Transport & Works Act (TWA) Order¹ and the associated applications for listed building consents and open space certificates, so that the inquiries proceed in an efficient and effective manner.
4. There will be no discussion of the merits of the cases at the meeting.
5. The [Transport and Works Act order: a brief guide](#) (the Guide) provides useful background guidance and I encourage you to read this.

Scope of the Inquiry

6. The application for the TWA Order is accompanied by an application for open space certificates² concerning the acquisition of open spaces, which will be considered at the inquiry. It is anticipated that the inquiry event will also address the listed building consent (LBC) applications,³ of which I understand there are ten.

Main Issues

7. The Secretary of State (SoS) issued a [Statement of Matters](#) on 1st April 2026. The applicant subsequently wrote to the SoS concerning the lack of

¹ Which would be made under the Transport and Works Act 1992

² Under s19(1)(b) and paragraph 6(1)(a) of the Acquisition of Land Act 1981 (as amended)

³ Under the Planning (Listed Buildings and Conservation Areas) Act 1990

explicit reference in the Statement of Matters to the open space certificates sought by the applicant.

8. I understand that the SoS may be issuing a revised Statement of Matters to reflect the concerns raised, but this is unlikely to be issued before the week commencing 20th April 2026.
9. Notwithstanding this, the Statement of Matters comprises the matters/issues about which the SoS wishes to be informed for the purposes of considering the application.
10. I therefore, propose that the Statement of Matters will form the 'main issues' around which the inquiry will be structured. I will be asking meeting participants for any relevant comments.

Format and procedure of the Inquiry

11. I anticipate that the inquiry will deal with the following:
 - the proposed Order under the TWA
 - a request for a direction for deemed planning permission for the development for which provision is included in the TWA Order
 - the ten listed building consents required because of the proposals in the TWA Order application; and
 - certificates under section 19(1)(b) and paragraph 6(1)(a) of Schedule 3 of the Acquisition of Land Act 1981 in relation to the acquisition of open space land.
12. It is anticipated that the above matters will be dealt with at the inquiry, but they may involve me making separate recommendations to the relevant SoS concerning the proposed Order (and deemed planning permission), listed building consents and open space land
13. I will be asking the applicant to consider providing an additional document (assuming no similar document has been submitted) which contains:
 - a short summary 'description of development'
 - a more detailed description of development aligned with the itemised matters which will be dealt with at the inquiry, as set out in '11' above.
14. The views of the parties will be sought on other matters which may need to be addressed in evidence.

Participation in the inquiry

15. The parties present will be requested to provide details of their intended representatives at the inquiries. The likely participation by other parties will be discussed.

Areas of agreement/disagreement

16. I will ask the applicant to summarise progress on preparation of statement(s) of common ground (SoCG) with updates as relevant from other parties.
17. I will be reiterating the importance of SoCGs particularly where there remain outstanding areas of concern with statutory objectors, including where they relate to land interests. SoCGs can be useful where other organisations raise particular concerns, allowing areas of disagreement to be focused and isolated, allowing me to understand the real points of contention.
18. I would also expect the applicant to engage the local authorities whose administrative area contains land affected by the proposed TWA Order (Tameside Metropolitan Borough Council and Oldham Metropolitan Borough Council). This should include an appraisal of relevant development plan policies, confirming where there is agreement concerning compliance/non-compliance with relevant policies. I would expect these SoCGs to also address the proposed Order, planning conditions and listed building consent conditions as appropriate.

Site visit timings and access arrangements

19. I will discuss, as far as is relevant at this stage, site visit arrangements. The parties are encouraged to think about locations to be included in the programme.

Nature, format and submission of evidence

20. It is intended that the inquiry will principally be a face-to-face event. I will discuss virtual elements in the form of streaming and the opportunity for remote participation.
21. The meeting will discuss whether certain inquiry matters could be dealt with in a round-table format or by relying on written representations. I wish to explore, in particular, dealing with the listed building consents/heritage matters through round table sessions.
22. I will also consider the format of the inquiry. That will include the applicant's suggested approach/structure contained in **Appendix C**.
23. I would like to understand the number and nature of representations likely to be made during the inquiry so that I can determine whether the suggested approach would be appropriate. There may be alternative ways of hearing evidence/inquiry format, which I will consider. I will also put forward my own suggestions for consideration during the meeting.
24. An update on progress with regards proofs of evidence will be sought (including which parties/individuals are intending to submit proofs), and I will provide any necessary updates during the meeting. There is

information contained within the Guide on preparing proofs of evidence. I also attach guidance in **Appendix B**.

Inquiry documentation

25. A project website has been prepared and is available. All documents should be available digitally and any submissions should be made to the Programme Officer for inclusion on the website (see paragraph 2).
26. I will require hard copies of certain documents, including full-size relevant plans.
27. I may ask the applicant or other parties if they are able to provide additional documentation in order to assist with the inquiry.

Timetable

28. The inquiry is set to take place on the following dates:- 9-12 June 2026, 16-19 June 2026, 30 June – 3 July 2026, 7-10 July 2026. Week commencing 22 June 2026 will be a non-sitting week.
29. The views of the main parties will be sought on the length of the event, and availability of witnesses during the period currently scheduled.
30. Following the receipt of time estimates, the Programme Officer will prepare a timetable for the inquiries.

Inquiry venue

31. The venue for the inquiries will be Uppermill Civic Hall, Lee Street, Oldham OL3 6AE.
32. Details of the accommodation and facilities available will be requested at the meeting and I would like clarification concerning the provision of microphones, retiring rooms, any accessibility issues, any dates/times when the room may be unavailable, suitability to accommodate a large number of people etc.

Other matters

33. I will ask the applicant to set out their proposal for recording land and rights negotiations with affected persons and statutory objectors, including how they intend to set out the position at the start of the inquiry. I may also ask the applicant and/or other parties to provide other documents/details prior to the inquiry to assist with good inquiry management.
34. There will also be an opportunity to raise any other procedural matters.

Matthew Woodward

INSPECTOR
14 April 2026

Appendix A – PIM Agenda

MEETING AGENDA

1. Introductions
2. Purpose of the meeting
3. Scope of Inquiry
4. Main issues (having regard to Statement of Matters)
5. Format and procedure of the Inquiry, with particular regard to listed building consents
6. Parties present and appearances at Inquiry
7. Areas of agreement/disagreement
8. Site visit timings and access arrangements
9. Nature, format and submission of evidence (including Proofs of Evidence)
10. Inquiry documentation/library/core documents
11. Timetable – Inquiry dates and times, suggested running order and availability of witnesses
12. Inquiry venue
13. Any other matters

Appendix B - Content and format of proofs and appendices

Content

Proofs of evidence should:

- focus on the main issues identified, in particular on areas of disagreement;
- be proportionate to the number and complexity of issues and matters that the witness is addressing;
- be prepared with a clear structure that identifies and addresses the main issues within the witness's field of knowledge and avoids repetition;
- focus on what is really necessary to make the case and avoid including unnecessary material, or duplicating material in core documents or another witness's evidence;
- where case law is cited in the proof, include the full court report/ transcript reference and cross refer to a copy of the report/ transcript which should be included as a core document;
- where data is referred to, include that data, and outline any relevant assessment methodology and the assumptions used to support the arguments (unless this material has been previously agreed and is included as part of the statement of common ground).

Format of proofs and appendices:

- All documents should be submitted digitally. The Inspector may request a hard copy of certain documents during the pre-inquiry meeting.
- Front covers to proofs and appendices should be clearly titled, with the name of the witness on the cover.
- Pages and paragraphs should be numbered.
- All appendices should be compiled separately from statements. Digital versions of appendices should be submitted as separate documents
- Appendices should have a contents page and be paginated.

Appendix C – Applicant note to Inspector concerning timetable and inquiry arrangements

I am writing to you on behalf of Network Rail to set out, for the Inspector's consideration in advance of the Pre-Inquiry Meeting on 17th April 2026, Network Rail's suggested proposals for the programming of the Public Inquiry, taking into account both the nature of the matters raised in the objections and some availability restrictions for Network Rail's witnesses and Lead Counsel (Richard Turney KC). I am also writing to confirm the email address which can be used by objectors for the purposes of serving Network Rail with their proofs of evidence.

Suggested Inquiry Programme

Firstly, we wanted to make the Inspector aware of the following availability restrictions for some of Network Rail's witnesses and Lead Counsel:-

- Two of Network Rail's witnesses on the level crossing closures proposed in the Order application, Jerry Greenwood and James Doodson, will be unavailable between 30th June and 3rd July inclusive as they are committed to attend a separate Network Rail inquiry. In addition, James Doodson will also be unavailable to attend the Inquiry on 12th June and 10th July.
- Network Rail's witness on Heritage & Listed Building Consents, Sandra Honeywell, is unable to attend the Inquiry on 17th June.
- Network Rail's Lead Counsel will possibly not be available to attend the Inquiry on 30th June due to an existing separate High Court hearing commitment on 29th June which may run into 30th June.

With these availability restrictions in mind, and also having regard to the fact that a number of the objections relate to the Order proposals for the closure of the Moorgate Halt Level Crossing, Network Rail would be grateful if the Inspector considers the following structure for the programming of the Inquiry:-

Week 1 – 9th to 12 June

Network Rail would propose to present its evidence for the Order application, aside from its evidence on the proposed level crossing closures, in the following order:-

- Need Case & Project Benefits - Mark Ashton
- Engineering & Design - Emma Clarke
- Construction - Keith Gardner
- Environment Management - Jim Pearson
- Traffic & Transport - Chris Cary
- Planning - Mike Gradwell
- Heritage & Listed Building Consents - Sandra Honeywell
- Noise & Vibration - Adam Lawrence
- Ecology - Will Horlock
- Property - Nigel Billingsley

Where programming permits, objectors on non-level crossing closure matters could be also be heard in this week.

Week 2 -16th to 19th June

Network Rail would propose utilising this week for the presentation of Network Rail's evidence and objector cases on the level crossing closures proposed in the Order application. In particular, Network Rail's evidence could be presented on 16th June and possible the morning of 17th June in the following order:-

- Level Crossing Policy & Strategy – Jerry Greenwood (evidence applicable to both level crossings)
- Level Crossing Safety – James Doodson (evidence applicable to both level crossings)
- Moorgate Halt Level Crossing – Engineering & Design of the Alternative Route – Lee Barraclough
- Moorgate Halt Level Crossing – Suitability of the Alternative Route – Chris Cary (recalled)
- Moorgate Halt Level Crossing – Highway Safety – Sean Wotherspoon
- Stockport Road Level Crossing - Engineering & Design of the Diversionary Route – Laurie Barbour*
- Stockport Road Level Crossing - Suitability of the Diversionary Route – Chris Cary (recalled)*

Objector cases in relation to the level crossing closure proposals could then be heard from 17th June to 19th June with objectors relating to the Moorgate Halt Level Crossing proposals being heard first followed by objectors (if any) relating to the Stockport Road Level Crossing proposals.

*To Note: If preferable these Network Rail witnesses could appear on Friday 19th June to give the Network Rail evidence specific to the Stockport Road Level Crossing proposals with the specific objectors to these proposals then appearing afterwards.

Week 3 – 30th June to 3rd July

Due to the potential unavailability of Network Rail's Lead Counsel on 30th June, Network Rail suggest that the Inspector may want to use this day for the accompanied site visit. If so then Network Rail would propose that the remainder of the week could be assigned to hearing the cases for objectors on non-level crossing closure matters.

Week 4 – 7th July to 10th July

Network Rail propose using this week to hear the remaining cases for objectors on non-level crossing closure matters. This week also then being used for other matters before closing such as any required sessions on planning conditions and/or listed building consent conditions.

Email address for service of Proofs of Evidence on Network Rail

We anticipate that the Inspector will use the pre-inquiry meeting to confirm requirements for the service of proofs of evidence. With that in mind we can confirm that Network Rail is content for objectors to serve their proofs of evidence electronically on Network Rail using the following email address w2btru.stakeholder@atkinsrealis.com. I can confirm that Network Rail is content for this email address to be publicised for this purpose.