

THE NETWORK RAIL STALYBRIDGE AND DIGGLE (SADDLEWORTH)

TRANSPORT WORKS ORDER ACT (REF DPI/G4240/25/18)

Road Safety Issues relating to closure of Moorgate Holt level crossing

Proof of Evidence

May 2026

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Contents

	Page
1.0 Qualifications and Experience	3
2.0 Background and Context	3
3.0 Objection relating to the closure of Moorgate Holt level crossing	4
4.0 Conclusion	6
5.0 List of Appendices	7

1.0 Qualifications and Experience

- 1.1 I am ALISTER JAMES STOREY, Principal Traffic Engineer and Traffic Manager at Oldham Council. I am a Fellow of the Institute of Highway Engineers and an Incorporated Highway Engineer. I also hold qualifications in Accident Investigation and Prevention (RoSPA) and Road Safety Audit. I have worked in the Highways sector over 38 years both in public and private sector.
- 1.2 I have held my current role at Oldham Council for over 6 years and lead a team that encompasses Traffic, Streetworks and Parking Services. I am a member of the GM Safer Roads (Vision Zero) Board and a member of the GMP led Fatal (collision) Review Panel.

2.0 Background and Context

- 2.1 I have been part of the team at Oldham Council that have been engaged with Network Rail for the past 3+ years on the TRU project.
- 2.2 My current role means I've an intricate knowledge of the highway network in around the Saddleworth Area and in particular in Uppermill which can be a huge traffic generator due to its many attractions.
- 2.3 The scope of my evidence is to address the technical safety concerns that arise with the Alternative Route proposed for the closure of the Moorgate Holt level crossing and present the results of a recent speed and traffic count to illustrate the concern.

3.0 Objection relating to the closure of Moorgate Holt level crossing

- 3.1 From a Highway/Road safety concern the points of this objection centre around the highway junction with the diverted footpath with the A670 Oldham Road considering the numbers of diverted users that would be forced on to the proposed route.
- 3.2 The A670 at this point is a two-way primary distributor route that is subject to a 30mph speed limit by virtue of street lighting. Approximately 33m to the North of the junction the speed limit reduces to 20mph and continues through the village centre.
- 3.3 A speed and traffic count carried out at the location from the afternoon of Thursday 7 May 2026 until the afternoon of Monday 11 May 2026 (see Appendix A) indicate that the 85%ile speed for the northbound lane is 31mph with an average speed of 27.33mph and a maximum recorded speed of 82mph. The Average Annual Daily Traffic (AADT) count was 6503. The total traffic count for the northbound lane was 26283, of which 962 were classed as large vehicles.
- 3.4 Historic traffic data shows that the AADT was slightly lower than expected based on previous records. The previous manual survey undertaken in 2021 shows an AADT of 6698 for the northbound lane of which 918 were classed as large vehicles (see Appendix B).
- 3.5 The Department for Transport (DfT) estimated data for 2024 (the latest figures available – see Appendix B) shows the estimated AADT for 2024 to be 7406 of which 1020 are classed as large vehicles.
- 3.6 Given that the count undertaken in May 2026 was only for a limited period, essentially over a long weekend, and included only one full working day (plus 2 partial working days), this could explain why the count was slightly lower than expected.
- 3.7 The footway width where the footpath joins the road is virtually non-existent. When exiting to the right there is no footway at all and to the left there's a pinch point that narrows the footway to less than 600mm. Pedestrian visibility towards vehicles approaching from the left is extremely poor with little hope of improving it as surrounding land is private.
- 3.8 The proposed arrangement causes safety concerns for the following reasons:
- Poor visibility for pedestrians entering A670 Oldham Road from Footpath 244

- Existing footway on A670 being too narrow for pedestrians at the junction with Footpath 244
- Footpath too narrow for people with disabilities to travel on the footway

Minimum footway widths (see Appendix C) for various disabilities are as follows:

- Person using a walking stick / cane – 750mm
 - Person using crutches / walking frame – 900mm
 - Vision impaired person using a cane or guide dog – 1100mm
 - Vision impaired person using a guide – 1200mm
 - Wheelchair user passing a pedestrian – 1500mm
 - Two wheelchair users passing side by side – 2000mm
- Pedestrians are forced to walk in the road due to narrow footpath putting them at risk of getting hit by moving vehicles
- Pedestrians travelling northbound from Footpath 244 onto A670 at additional risk of being hit by moving vehicles as they are facing away from oncoming traffic

4.0 Conclusion

- 4.1 The highway safety risks of directing people to use Footpath 244 as an alternative to Footpath 209 put pedestrians at undue risk of being hit by moving vehicles. The existing footway on A670 is too narrow to be considered a safe alternative route.
- 4.2 Although pedestrians who do not have any disabilities could probably struggle to walk along the exiting footway, if there is a pedestrian approaching from the other direction one of them will be forced to step into the road.
- 4.3 The footway is too narrow to accommodate people with disabilities and does not meet the minimum widths required as specified in the Department for Transport' (DfT's) Inclusive Mobility guidance.

5.0 List of Appendices

5.1 Appendix A

Traffic Count A670 Oldham Road Uppermill 7 May 2026 to 11 May 2026

5.2 Appendix B

Historic Traffic Data A670 Oldham Road Uppermill

Retrieved from: <https://roadtraffic.dft.gov.uk/count-points/7435> 12 May 2026

5.3 Appendix C

Inclusive Mobility (DfT) – A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure

Retrieved from:

<https://assets.publishing.service.gov.uk/media/61d32bb7d3bf7f1f72b5ffd2/inclusive-mobility-a-guide-to-best-practice-on-access-to-pedestrian-and-transport-infrastructure.pdf> 12 May 2026