Joint Statement of Case: Archer Street Residents

Objection to Proposed Construction Access Route (Mill Lane – Archer Street – Brookfields)

Submitted to: TransPennine Route Upgrade (TRU) / TWAO Public Inquiry

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Submitted by: Archer Street Resident Representative (Catherine Wright)

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Contact: [Contact details to be provided as required]

Statement Includes: Formal objections by two residents of Archer Street, with photo references and supporting evidence, submitted in accordance with TWAO public inquiry requirements.

1. Introduction

This Statement of Case is submitted by Catherine Wright, resident of Archer Street, representing disabled and vulnerable residents. It includes a written statement from a second resident and is intended for consideration by the public inquiry panel. Both residents wish to make clear that they support the TransPennine Route Upgrade (TRU) and the development of the new Mossley station. Their objections are solely directed at the proposed construction access route via Mill Lane, Archer Street, and Brookfields, due to disproportionate impacts on safety, health, disability access, and community wellbeing.

2. Mill Lane – Unsuitability and Safety Risks

- Mill Lane is a steep, narrow, one-way road, signposted as “UNSUITABLE FOR LARGE VEHICLES” (*See Photo 1 – Mill Lane low bridge*).
- It terminates at a 7ft 3in low bridge, making it impassable even for delivery vans.
- Cars frequently mount pavements to pass, presenting significant pedestrian hazards (*See Photo 3 – pavement mounting*).
- Construction vehicles would render the road dangerous and impassable, especially during congested school times.
- Mill Lane and Brookfields serve as the main safe walking route for children and parents to Milton Primary School (*See Photo 2 – school route congestion*).
- Mill Lane is the only access road to Milton Primary School and regularly becomes hazardous or closes during adverse weather (*See Photo 3 – adverse weather closure*).

3. Archer Street – Inappropriateness as an Access Route

- Both sides of Archer Street are lined with parked cars, with the street remaining narrow and featuring tight corners even when cars are absent.
- Steep steps to houses have caused accidents, and no alternative parking is available (*See Photo 4 – Archer Street steps and narrow layout*).
- Disabled, elderly, and mobility-impaired residents would be disproportionately affected by increased traffic and restricted access.

4. Equality Act 2010 – Legal Duties Not Met

- Network Rail and associated agencies are legally obliged to make reasonable adjustments and to anticipate the needs of disabled and vulnerable residents.
- Protected characteristics impacted include disability, age, and long-term health conditions.
- There has been inadequate consideration of mobility issues, mental health impacts, or emergency access needs, risking indirect discrimination.
- This matter will be pursued further, if necessary, under the Equality Act 2010.

5. Emergency Access Risks

- Residents include individuals with unstable epilepsy requiring frequent emergency services access; ambulances already struggle to reach Archer Street.
- Construction traffic would make emergency access impossible, posing serious risks in cases of seizures, heart attacks, strokes, or fires.
- A previous fire on Vernon Street required four fire engines; such access would be compromised under the proposed arrangements.

6. Brookfields – Land Use Concerns

- There is no justification for placing a construction compound on Brookfields; alternative sites exist, such as spare land off Manchester Road.
- Using Brookfields risks reopening previously rejected planning applications (ref: 19.00489.FUL) and may enable the landowner to revive development plans.
- Residents have observed workers cutting down trees, discussing parking, and giving evasive responses when questioned.
- No meaningful communication or engagement with residents has taken place regarding land use.

7. Impact on Health and Wellbeing

- Stress is a major trigger for seizures among residents; the process has caused significant anxiety and distress, with concerns that seizures may worsen.
- There is a strong sense of duty among residents to speak on behalf of others who cannot articulate their concerns.

8. Position and Requests

- The proposed route is not the only option available; it is simply the most convenient for the project, with no demonstrated duty of care to children or vulnerable residents.
- Public safety is placed at risk by the current proposal.

Formal Requests:

- Rejection of the proposed Mill Lane–Archer Street–Brookfields access route.
- Selection of a safer, alternative route.
- Proper consideration of disabled and vulnerable residents under the Equality Act 2010.

9. Second Resident Statement – Vicky Pearson

9.1 Introduction

- Long-term resident of Archer Street (31 years), supportive of the TRU project and Mossley station.
- Objection concerns only the proposed construction access route via Mill Lane, Archer Street, and Brookfields, which would cause severe and disproportionate harm to mental health, safety, and daily functioning.

9.2 Personal Circumstances and Vulnerability

- Lives with severe mental health conditions exacerbated since 2020; noise is a major trigger causing physical and behavioural symptoms.
- Relies on routine, stability, and quiet surroundings; some days cannot complete basic tasks due to mental health challenges.
- Sudden or persistent noise destabilises her very quickly.

9.3 Essential Importance of Brookfields

- Brookfields has been a daily sanctuary for 28 years, providing safe spaces essential for emotional regulation.

- Canal and river paths are unsuitable alternatives due to exposure, foot traffic, and safety concerns; Brookfields is the only accessible, quiet location available at any time.
- Losing access would remove the only tool available to prevent escalation during mental health episodes.

9.4 Impact of Proposed Construction Access Route

Noise and Vibration

- Heavy vehicle noise would trigger severe mental health episodes; vibrations would worsen anxiety due to existing structural concerns.
- Already lives with fear regarding house stability; construction traffic would intensify this.

Loss of Safe Space

- Disturbance to Brookfields would remove the only safe space for emotional regulation; no alternative location offers comparable safety or accessibility.

Impact on Recovery

- Previously a high-functioning community member, now working to regain stability; proposed disruption would make recovery impossible and have long-lasting, disproportionate effects.

9.5 Wider Safety and Environmental Concerns

- Mill Lane is steep, narrow, and already dangerous for pedestrians, with blind spots and no safe passing points.
- Forms part of the main safe walking route for children; only access road to Milton Primary School.
- Large vehicles would need to mount pavements or reverse, posing extreme danger near a school.
- A safer alternative access point exists from Manchester Road.

9.6 Position and Requests

- Supports the TRU project but objects to the proposed access route.
- Requests reconsideration of the Mill Lane–Archer Street–Brookfields route and adoption of a safer, less harmful alternative.
- Requests proper consideration of vulnerable residents under the Equality Act 2010.

10. Conclusion

The residents of Archer Street, while supportive of the TRU project and its objectives, formally object to the proposed construction access route due to its unacceptable impacts on safety, health, disability access, and community wellbeing. The evidence presented demonstrates that Mill Lane, Archer Street, and Brookfields are wholly unsuitable for construction traffic, and that alternative routes must be considered to fulfil legal and moral duties of care. The public inquiry is respectfully requested to reject the proposed route, require selection of a safer alternative, and ensure full compliance with the Equality Act 2010 in protecting all residents.