OBJECTIONS TO NETWORK RAIL STALYBRIDGE TO DIGGLE TWA ORDER

Roger Blackmore Uppermill Councillor, Saddleworth Parish Council

[redacted]

My objections are based on a number of issues:

1. Inadequate consultation and information:

1.1 Three years ago it appeared that Network Rail would provide a footbridge at Dark Lane over the railway line at the former Moorgate Halt. However, Network Rail changed its stance without proper consultation with the community, and without sufficient knowledge or thought. The basic facts are:-

1.2 Planning permission for a footbridge was sought by Network Rail on 10th June 2022 and approved by Oldham Council on 5th August 2022. As a part of its application Network Rail made a well-argued case, explaining why a footbridge was necessary.

1.3 Network Rail then changed its position and submitted an application to close Footpath 209 under Highways Act powers without any alternative route. This was refused by the Highway Regulation Committee of Oldham Council on 14th July 2024.

1.4 On 12th November 2024 four Network Rail staff met with three representatives of local walking groups at the Moorgate Level Crossing. Network Rail's minutes of the meeting record that the representatives of the walking group asked for information about:-

- More detail of the costs for the footbridge (they had suggested that there might be ways of reducing the costs);
- Whether the footbridge could be completed during the works at Oldham Road bridge, and if this would bring down costs.

1.5 Network Rail had informed the representatives of the walking groups that a public consultation event was to take place on 28th November 2024. **The information which had been requested was not provided prior to 28th November. Neither was it provided at the consultation event.**

1.6 On 28th November 2024 the "consultation" event was held by Network Rail at which it set out its intention to close Footpath 209, with the suggestion that walkers should use Footpath 244 instead. There was no exploration with local people of the pros and cons of these new proposals when compared to a footbridge. The purpose of the event was clearly to "sell" Network Rail's new stance. Despite this, there was a very clear response from a large number of people. Of 113 responses expressing an opinion for or against Network Rail's proposals, 29 were in favour and 84 were against. By far the largest type of response was "strong disagreement" with the proposals (62 responses).

1.7 As a member of the Moorgate Footbridge Campaign Group, I believe that the result would have been even clearer if Network Rail had been open and honest in describing the options. Staff from Network Rail presented the choice as being between keeping the level crossing open or walkers being diverted onto Footpath 244. Emphasis was placed upon "near misses" at the level crossing. **A footbridge was not mentioned as an option. Some Network Rail staff seemed unaware that a footbridge had previously been proposed by Network Rail and approved by Oldham Council.** The same staff did not know that Oldham Council had recently refused permission for the footpath over the level crossing to be

closed, because Network Rail had withdrawn the footbridge proposal and was no longer offering an acceptable alternative.

1.8 **The Campaign Group requested copies of the detailed consultation responses from Network Rail in September 2025.** We were happy for Network Rail to redact any personal details. We wanted to have the best possible understanding of the views submitted by members of our community. It was important to us that we considered them carefully as we assembled the Campaign's case. We also wished to assess whether those who had been judged by Network Rail to be in favour of Network Rail's proposals had been led to a misunderstanding of the options. **We believed that people did not understand that the true choice was between a diversion onto Footpath 244 and a footbridge replacement for the level crossing. Network Rail refused our request for copies of the consultation responses.**

1.9 **In any case, Network Rail ignored the result of the consultation. It did not make a public report on the outcome of the consultation, and provided no evidence of having learnt anything from the information which it should have gleaned from the responses.** A letter dated 19th May 2025 from Network Rail's Communications Manager (TRU) merely said… *"there are differing opinions within the community about the future of the Moorgate level crossing".*

1.10 There have been attempts by Oldham Council; Saddleworth Parish Council; local walking groups and local residents to persuade Network Rail, through constructive dialogue, to change its position. These efforts have had no effect.

1.11 In early 2025 the walking group representatives joined the Moorgate Footbridge Campaign Group at the point of its formation. Many further requests for both information and discussion about the questions raised in 1.4 were made to Network Rail. We had to wait until early December to receive a breakdown of the £4.5m projected cost.

1.12 Myself among other objectors have **suspicions that Network Rail has provided inaccurate information and that this is the reason for withholding or delaying information. In a response to the freedom of information request Network Rail in December 2025 provided an analysis of costs for the 209 footbridge which totalled 900,000 more than its component parts. (See 1.13). Apart from this "mistake" we believe that component costs have been exaggerated in an attempt to prove that the Moorgate footbridge is poor value for money. We are offering evidence that other footbridges along the line in Tameside and West Yorkshire have been provided at much lower cost, notably the Barrowby bridge near Garforth which dwarfs the footbridge that the Moorgate Campaign Group is appealing to be provided.**

The FOI response received regarding the bridleway/pedestrian footbridge currently being installed at Barrowby Lane near Garforth is shown here. The total cost to design, procure and deliver the footbridge is just over £2 million.

1.13 Moorgate Campaign group's suggested realistic figures can be compared with Network Rail's figures provided in December 2025:

Detail of estimate	**NR figures**	**Correct addition**	**Realistic figures suggested**
Supply and install	991000	991000	330000
Groundworks etc	251000	251000	251000
Closure of level crossing	584000	584000	0
Design cost	517000	517000	250000
Project mgt. cost	194000	194000	100000
Access land cost	435000	435000	100000
Total base cost	3867000 error	**2972000** correct	**1031000**
Risk provision	619000	?	600000
Total cost	**4486000**		**1631000**

1.14. **Despite our enquiries Network Rail has never shared its value for money calculation methodology or its value figures with us.** We do not know whether there is any validity in its financial project appraisal.

At the time that it sought planning permission for a footbridge Network Rail referred in its Design and Access Statement to some of the benefits of providing a footbridge. One might think that before deciding to abandon the footbridge Network Rail would have attempted to estimate all the costs (or lost value) of not building it. These would then have been set against the estimated construction costs. The benefits of providing a bridge might well include:-

- Avoidance of early deaths or life changing injuries, particularly to children, arising from exposing them to serious risk by encouraging them to use Footpath 244;
- Avoidance of the negative impact on the vital local tourism economy;

- Avoidance of damage to the local service economy due to the inconvenience suffered by local residents;
- Avoidance of the impact of more residents resorting to car usage rather than walking to the village centre or Ladcastle Road and the Moorgate Quarry Recreation area;
- Avoidance of the negative health impacts of the reduction in numbers of people walking to services and taking recreational exercise;
- Avoiding the cost of the destruction of a heritage asset:
- The benefits of being able to introduce bi- directional running on the TRU. This must have an operational value. We have been told that bi directional running will not be possible if the level crossing remains.

1.15 **The Campaign Group has not seen any evidence that a proper, comprehensive value for money assessment was made by Network Rail, or indeed that it has ever had a sufficient understanding of Uppermill to make this possible**. An open-minded approach, involving genuine learning from consultation with the local community and the local authorities, would have enabled a meaningful assessment of "costs" and "value".

1.16 **Network Rail's approach seems to be to minimise the responsibilities and costs that it faces, and pass these on to others.** Its inclusion of the Safety Risk Assessment of Footpath 244 in its application (see Appendix A of the SRA in relation on to the exit of Footpath 244 onto Oldham Road) gives the strong impression that it intends to leave an extremely concerning safety issue as the responsibility of the local authority - which will be expected to monitor the incidence of accidents and then attempt to mitigate the danger.

2. Failure of Network Rail to comply with its guiding principles:

2.1 **Network Rail has, in documents such as "Our Guiding Compass", made broad commitments to following good sustainable development practice during the TRU programme.** These cover matters such as "safer communities, working with communities, minimising disruption, improving the economy, being a catalyst for regeneration, enhancing and protecting community spaces and places along the route, respecting heritage assets, and investing in wellbeing……and community spaces to leave a net positive impact on society." **The proposals for Moorgate do not accord with these commitments.**

2.2 There is a very marked disparity between the proposal for Moorgate and the treatment of at least two other footpath crossings in the adjoining borough of Tameside at the time the line was electrified, and then later subsumed into TRU. These are paths with much lower usage, but footbridges have been constructed. The arguments for these footbridges may have been good, but they are certainly much less compelling than those at Moorgate. **The usage of the Moorgate crossing is about nine times more intense than at those footbridges.**

2.3 **In Uppermill there appears to be a persistent and counter- productive failure by Network Rail to work with a local community, or even to try to understand the particular local circumstances.**

3. Failure to plan to avoid chaos caused by road closure at Greenfield Station:

3.1 Network rail does not intend to provide a temporary or "Bailey" bridge to reduce the chaotic and dangerous effects of highway closures and diversions during the period that the Greenfield Station road bridge is being demolished and rebuilt. **Has Network Rail carried out a thorough risk assessment of road closure proposals?**

3.2 **I object to road closures causing a potential danger to life as emergency services will be delayed without a temporary bridge being used.** Many examples of chaotic journeys and delays can be forecast, with harmful and costly consequences:

- Essential deliveries will be impacted without a temporary bridge being used, for example deliveries of essential medication and care will not be on time, impacting life and wellbeing. Day ambulances for day appointments will be late for many medical appointments leading to cancer /dialysis/essential medical appointments and treatment being missed or affected. They operate on tight schedules so suggestions to "set off earlier" are too glib.
- Mental health strain and adverse impacts due to less reliable accessibility of health services, also family support and appointments limited due to increased travel timings. Mental health and stress will increase due to road closures and diversions being grid-locked.
- Schools will be adversely affected due to commuting delays and pupils will be late, impacting on the quality of education.
- Public transport and connections will not be viable without a temporary bridge being used instead of full road closures. Taxis and airport transfers will cost substantially more without a temporary bridge being used.

4. Lack of disabled spaces and pick-up and drop-off spaces at Greenfield Station:

4.1 I object to the amount of proposed disabled spaces being limited to only 4 as most spaces at Greenfield station should be marked out for the disabled due to the steep hill and footpaths up to the station. **This is the only way for disabled people to access the station, just at the time that accessibility is at last being provided on the Huddersfield platform. Surely the long-awaited use by disabled passengers should be properly provided for.**

4.2 Network Rail's presentation stated that the 3 or 4 disabled spaces was the amount recommended for the amount of passengers but Guide Bridge has much more disabled parking and it has less passengers than Greenfield. The unique difference is that Greenfield station has a very steep hill and no dropped kerbs or safe footpaths for the disabled. Alternative parking at the rugby ground, on Shaw Hall Bank Road, Chapel Road and Tesco car park's railway spaces all accommodate general parking. **More disabled spaces would reduce congestion, improving both safety and accessibility for disabled rail users.**

4.3 It is suggested that **a designated pick-up and drop-off area is essential for the safety of rail users next to the busy Shaw Hall Bank Road at the station.** The footpath could be re-sited by the station wall and the area be marked out adjacent to the roadway.

5. Failure to assure a future stopping service of 2 trains per hour:

5.1 Network Rail's indication of a stopping service of "up to" two trains per hour after the upgraded route is complete is poor reward for the years of Saddleworth's

residents', businesses' and visitors' patient wait for better rail services. **Network Rail staff have, understandably, been non-committal about the need for stopping trains to run one per hour into Piccadilly and one into Victoria.**

5.2 Station passenger usage figures between Stalybridge and Leeds for the twelve months ending 31st March 2025 (see below at 5.5) show a stark disparity between train services west of Huddersfield and those east of Huddersfield. I protest at how badly Mossley, Greenfield, Marsden and Slaithwaite are treated with a basic train service of just one train per hour (1tph) which is the same level as Deighton, Cottingley and Ravensthorpe **even though station usage at each of Greenfield, Mossley, Marsden and Slaithwaite is 3 to 6 times more than any one of them.**

5.3 Mossley, Greenfield and Slaithwaite were all busier than Batley with its half-hourly service and Marsden was not much less than Batley. There is a lot of data to show that an increase in frequency from hourly to half-hourly leads to a significant boost in patronage that would likely mean **all four stations west of Huddersfield would become amongst the busiest stations between Manchester and Leeds.**

5.4 In spite of these statistics there is still no commitment to provide the much-needed half-hourly service post TRU, even though an increase is needed and has been needed for quite some time. **There is no good reason why two trains per hour throughout the day could not be introduced before the completion of TRU in the early 2030s.**

5.5 **Station passenger usage figures – 12 months to 31 March 2025**

Station name	Three Letter Code	Local authority:	Apr 2024 to March 2025
Huddersfield	HUD	Kirklees	3,136,040
Dewsbury	DEW	Kirklees	947,090
Stalybridge	SYB	Tameside	840,136
Mirfield	MIR	Kirklees	364,112
Greenfield	GNF	Oldham	350,528
Morley	MLY	Leeds	274,298
Mossley	MSL	Tameside	260,288
Slaithwaite	SWT	Kirklees	235,294
Batley	BTL	Kirklees	227,096
Marsden (Yorks)	MSN	Kirklees	220,584
Deighton (1tph)	DHN	Kirklees	63,430
Cottingley (1tph)	COT	Leeds	52,858
Ravensthorpe (1tph)	RVN	Kirklees	31,442

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