

PROOF OF EVIDENCE

SUMMARY

30th June 2026

MOORGATE FOOTBRIDGE CAMPAIGN GROUP

ANDREW FLETCHER

Objections 65 and 130

NETWORK RAIL STALYBRIDGE TO DIGGLE

TRANSPORT AND WORKS ACT ORDER

SUMMARY

1 INTRODUCTION

- 1.1 I am Andrew Fletcher. I will be speaking about my personal objection and as a representative of the case made by the Moorgate Footbridge Campaign Group (The Group).
- 1.2 I have lived in Uppermill since 1974. From 1974 to 1980 I lived at 16 High Street Uppermill, quite close to where Footpath 244 meets Oldham Road. I have always been a keen hill walker.
- 1.3 I gained a Postgraduate Diploma in Town Planning from the University of Manchester in 1975. From 1978 to 2006 I was employed by Oldham Council. In the later part of this period I was an Assistant Chief Executive and a Departmental Director. From 2006 to 2012 I was a consultant. My main area of work as a consultant was providing support to the 10 Greater Manchester Councils. As a consultant I helped in the early stages of what became the Places for Everyone framework for Greater Manchester.
- 1.4 I retired in 2012. Since 2016 I have, on a voluntary basis, helped the Saddleworth Parish Council prepare its Neighbourhood Plan, as a co-opted member of its Strategic Planning Committee

Between 1988 and 1994, at Oldham Council, I led a team in the Planning Department. With colleagues I helped to design and create the footpath network in Saddleworth that we know today. This was a part of a wider programme of quite dramatic improvements to the environment. Securing public investment and using it efficiently and effectively was absolutely crucial to this work.

Three of my colleagues in the Planning Department who I worked with at this time are objectors to the Moorgate proposals. Two were from that team. The other was the Director of the Department.

As I was promoted through the Council I remained responsible for this work but my roles broadened. In due course these included local planning, economic development policy, housing strategy, environmental policy and the borough's tourism strategy - all within a framework of achieving more sustainable development. I have relevant experience of planning town centres. I was responsible for regeneration planning in Oldham Town Centre and was later the Chairman of the Oldham Town Centre Partnership.

I have considerable experience of consultation and engagement. This relates to local planning and major regeneration schemes. Engagement with communities and local businesses was at the centre of this.

Whilst I have professional experience, and once worked as a consultant, my work with the Campaign Group has been entirely voluntary, entirely unpaid. That actually applies to everyone who has helped. Les Harrison, in particular, is still a practising consultant. Nonetheless he has helped, completely for free.

- 1.5 Since 2004 I have been registered disabled due to a degenerative form of sight impairment. This affects my experience of the outdoor environment, including my use of footpaths. I may refer to this during my participation in the Inquiry. I am happy to be asked to provide further information about my condition if anyone feels this would be helpful.
- 1.6 In my evidence I will be referring to the negative economic, social and environmental impacts which will result from the proposal to close the Moorgate level crossing and reroute users onto a dangerous, inconvenient and non- inclusive alternative path, rather than providing a footbridge.
- 1.7 The Campaign's Statement of Case is a comprehensive one. Some aspects of the section on Safety, have been covered during earlier Inquiry sessions. My evidence covers elements of the remainder of the case. My Proof touches only lightly on the subject of heritage. That has just been covered by Mr Buckley.
- 1.8 Our emphasis is on the positive contribution that the area makes to the Greater Manchester area, and also, to the towns and cities of West Yorkshire. We hope that this will be an even stronger contribution in the years to come. This is what our Neighbourhood Plan says. It's in the Vision section and it permeates the whole Plan. **We think that our area is an example of the "levelling up" agenda already happening. We do not want this to be undone. We are not NIMBYs. We want our area to be allowed to continue to make a very positive contribution to the North. Please don't make that difficult.**

Amongst everything that the Campaign Group says, amongst all its arguments, Safety is absolutely paramount. We don't want anyone to die on the level crossing. We don't want anyone to die on Oldham Road. We want the very safest solution. We have taken this position since the very first meeting of the Group in March 2025. We would have said this to Network Rail if we could have met them. This has been our constant position. This should have been established as Common Ground 15 months ago.

2 ECONOMIC, SOCIAL AND ENVIRONMENTAL IMPACTS

- 2.1 In paragraph 3.2.46 of Application Document NR15 Network Rail reminds us that "the NPPF states that the primary purpose of the planning system is to contribute to the achievement of sustainable development," Likewise the purpose of transport

infrastructure investment is to bring about economic, environmental and social benefits, in combination – in other words - sustainable development. To quote from Network Rail's sustainable development strategy for TRU, *Our Guiding Compass*, "We believe that sustainable development is the only way to keep us on track to a better and more sustainable future." And in another quote from that document "By transforming communities along the route – and beyond – we aim to unlock significant economic, social and environmental benefits."

In our opinion Network Rail has lost sight of this at Moorgate.
We wish we could have helped to keep them "on track".

To achieve sustainable solutions you have to understand the place and its people.

- 2.2 **I have listened to almost every minute of the Inquiry and I think I have read every Network Rail Proof. I haven't heard anyone describe how Uppermill, or Saddleworth, functions. How the economy works. How it fits into Greater Manchester's recent success.**

At Moorgate, matters such as the nature of the local economy, easy access to local environmental assets which have been painstakingly created, provision for healthy lifestyles, carbon reduction, impact on nearby residents, anti social behaviour seem to have been omitted. Others like inclusion have been thought about much too late. Network Rail's much narrower "value for money" calculations don't include these.

My Proof of Evidence points in more detail to the matters which have been overlooked. These are matters which should have been considered about two years ago, when Network Rail was deciding between the options for the replacement of the level crossing.

3 CONSULTATION AND ENGAGEMENT

- 3.1 The Campaign Group has commented on Network Rail's consultation process in respect of Moorgate. Our objection and Statement of Case explain our concerns about the way the November 2024 Consultation was handled.
- 3.2 Following that consultation event we repeatedly asked for the opportunity for a constructive dialogue with Network Rail. We thought this would be in line with the *Our Guiding Compass Mission Statement* where it says "All the while working with our communities to make sure we are all heading in the right direction"
- 3.3 We wanted to increase Network Rail's understanding of the Saddleworth area, and its role within the TRU corridor. Network Rail rebuffed each approach, saying that it intended to proceed to an Inquiry. We have therefore had no alternative but to submit an objection, a Statement of Case and Proofs of Evidence in order to secure any sort of dialogue.

- 3.4 When we read Network Rail's Statement of Case we found what we believe to be misleading information about the outcomes of the Objection period of November / December 2025. We also wanted to be sure that Network Rail had received and considered new information about the dangers of Footpath 244, provided by a member of the community, the resident of 6 Oldham Road, Uppermill. Therefore, working with Mr Kevin Lawton, to avoid repetition, we submitted our views on 24th April so that Network Rail would have the opportunity to correct misleading information and remedy omissions well before the Inquiry.
- 3.5 We have been advised to include the 24th April 2026 submission in a Proof of Evidence. It is therefore attached to this Proof as Appendix A.

Since we prepared that Appendix things haven't got better. Network Rail still didn't approach the Campaign Group for a Statement of Common Ground. We have had to do that during the Inquiry. Our response was brief but very significant. We said we are not arguing about the safety of the level crossing. We could have said that 15 months ago. A great deal of public money might have been saved and some Inquiry time.

And then last minute changes have been put out for consultation during the Inquiry. Unsurprisingly, these have unanticipated consequences. We pointed these out by the deadline last Friday. They could have been anticipated if Network Rail had talked with us many months ago.

4 A SUSTAINABLE DEVELOPMENT SOLUTION

- 4.1 A different approach by Network Rail could have led to the TWAO Application containing a completely different solution. Indeed it would not have even needed to be in the TWAO. The footbridge could have already been built before the planning consent expired. A great deal of money has been spent on taking the Moorgate proposals through the TWAO process. This wasteful expenditure could have been avoided. The money could have been put to better use.
- 4.2 The solution would have needed to be built on a good understanding of this part of Saddleworth, how it functions, and the role it has within the TRU corridor. This would have resulted in a realisation that Footpath 209 is key piece of the infrastructure of the village, for economic, social and environmental reasons. The route has both a recreational and functional use. In fact the two roles are so interrelated that the distinction is not relevant in this case.
- 4.3 A proper solution would have had wider objectives. Not just a "value for money" assessment of ways of removing the level crossing.
- 4.3.1 The twin objectives would have been to make passage across the railway completely safe, with no level crossing, (other parts of Footpath 209 are already completely safe), **but also** to encourage the flow of people across the railway by offering a very safe, convenient and inclusive alternative to the level crossing. Only a footbridge can

deliver on these objectives. That would have been a good Statement of Common Ground.

- 4.3.2 Everyone will benefit if the number of people moving across the railway increases. The more the better. More healthy exercise, a stronger economy, carbon reduction, greater access to environmental assets, more train passengers coming to visit Saddleworth, more benefit from past investment that has transformed our area, public and private.
- 4.3.3 This would make the footbridge even better value for money.
- 4.3.4 Footpath 244 is never going to increase usage. People will be deterred by that alternative.
- 4.3.5 To increase usage would involve Network Rail working constructively with local stakeholders. The route would be signed to “Uppermill village centre”; “to Moorgate Recreation Area”; to” Ladcastle viewpoint”; to “Saddleworth Golf Club”; etc. Signs will indicate the route is suitable for almost all users. The history of the footpath would be explained and celebrated with information boards. Online information would also be used. There would be an official opening of the new footbridge to encourage its use and point out the attractions which can be accessed. Some support from the TRU Community Fund could be made be available to help. People will be able to appreciate the new railway as they pass over it. **This would be “levelling up”.**

This can all be realised with a footbridge. If only we had talked together. **But sadly I have to now explain the problems with the proposals which have been put forward by Network Rail.**