

Catherine Wright Proof of Evidence Appendix and Supporting Documents

CW1 Photographic Evidence of Mill Lane and Brookfields unsuitability for the purposes applied for.

CW2 Photographic evidence of Network Rail's reply letter to my objection.

CW3 (NR14 Environmental Report Vol 1, p.20)

CW4 Personal witness Statement evidence of resident Vicky Pearson.

CW5 Photographic evidence of the adverse impact on the landscape and waterlogged ground of Brookfields.

Photo Evidence

The following photographic evidence is submitted to illustrate the physical conditions at Mill Lane and Brookfields, specifically highlighting the gradients and inclines present. These images have been provided as Exhibit CW1 and are intended to support the factual assertions made throughout this Proof of Evidence.

Location	Feature	Exhibit Reference
Mill Lane	Gradient	CW1
Brookfields	Incline	CW1

Each photograph has been carefully selected to demonstrate the challenging nature of the terrain, which is central to the arguments outlined in this document regarding the unsuitability of these routes for construction compound access.



Exhibit CW1 – Brookfields: Incline



Exhibit CW1 – Brookfields: Incline

These photographs capture the incline at Brookfields, providing visual evidence of the terrain's unsuitability for heavy construction access.

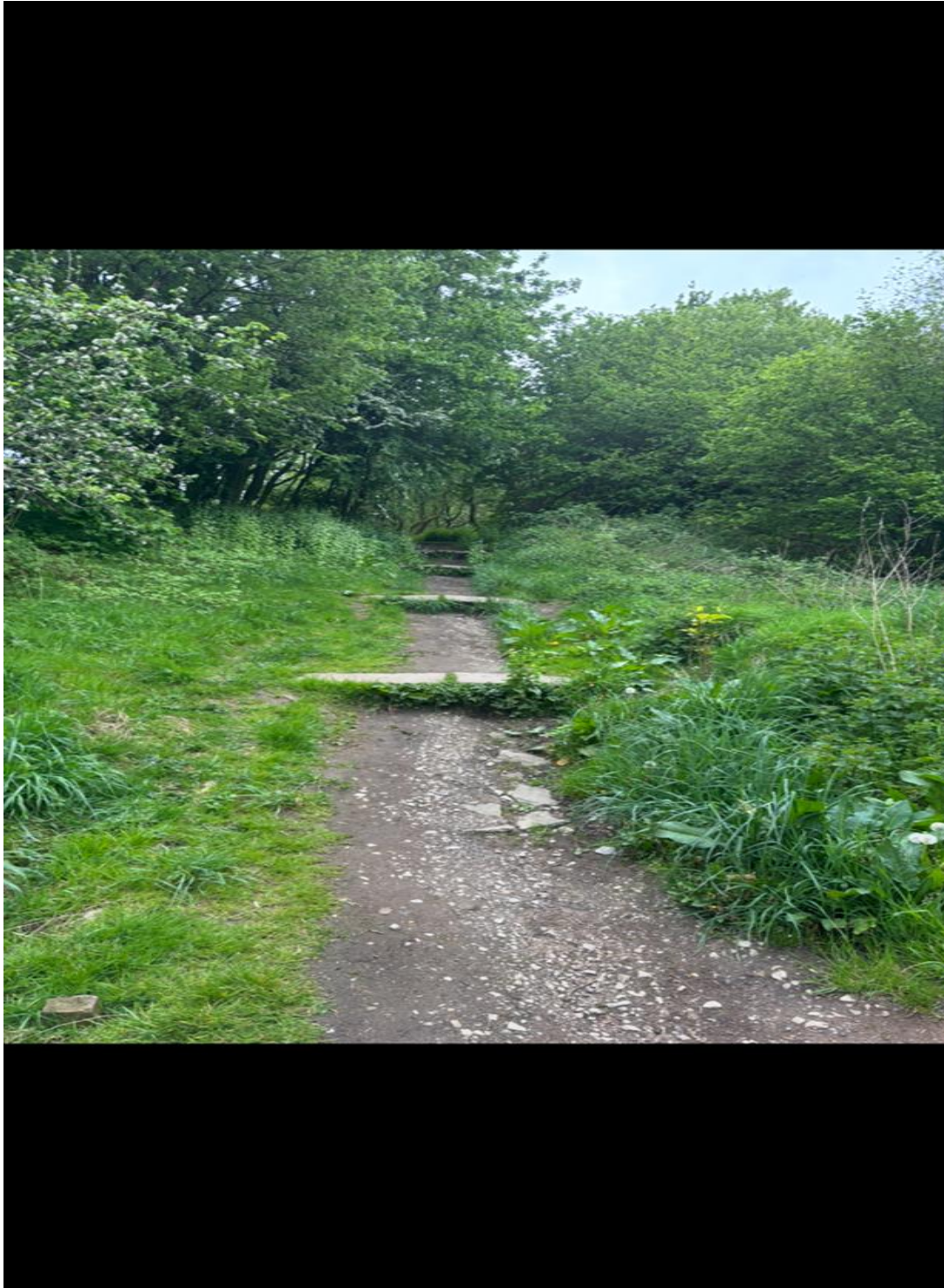


Exhibit CW1 – Brookfields: Gradient

Evidence supporting the argument that access to Brookfields from Archer Street presents significant challenges for construction vehicle access.



Exhibit CW1 – Mill Lane: Gradient

Photographic evidence of the gradient at Mill Lane, reinforcing concerns about terrain and access for construction purposes. Please note the water running down the road.

Exhibit CW2)

Network Rail Ground floor 4 Travis Street
Manchester
M1 2NY

catherine.wright78@gmail.com *mailto:penny.carter@networkrail.co.uk*

27th February 2026

Dear Ms Wright,

**Re: Network Rail: Stalybridge to Diggle (Saddleworth) scheme OBJ
110 – Catherine Wright**

Network Rail is now in receipt of your letter of objection dated 16th December 2025 to the Network Rail (Stalybridge to Diggle(Saddleworth) Enhancements) Order application (“the Order”) (**NR02**).

We note your objections to the Order and this letter sets out our response to those matters raised in your letter.

1 Use of Mill Lane by construction traffic

Mossley Station construction works – Primary Temporary Construction Compound

The primary temporary construction compound proposed to be used for the works to construct the relocated station is to be located on Manchester Road (A635) on land that is located between the existing railway and Manchester Road (“the Primary Temporary Construction Compound”). Therefore, the majority of construction vehicles associated with the construction of the relocated station will be travelling to and from the Primary Temporary Construction Compound, with those construction vehicles accessing the Primary Temporary Construction Compound to and from Manchester Road (A635).

It is our intention that the construction access route to be prescribed for the construction vehicles travelling to and from the Primary Temporary Construction Compound would not include the use of Mill Lane.

Mossley Station construction works – Secondary Temporary Construction Area

Network Rail Infrastructure Limited Registered Office: Network Rail, 2nd Floor, One Eversholt Street, London, NW1 2DN Registered in England and Wales
No. 2904587 www.networkrail.co.uk

To support the works to construct the relocated station we are also proposing to establish a secondary temporary construction area to the west of the existing railway on the area of land known as

Brookfields (“the Secondary Temporary Construction Area”). The purpose of the Secondary Temporary Construction Area is to serve as a temporary material laydown and spoil storage area to support the construction of the station works. It is our intention that materials and spoil will be brought to and/or from the Secondary Temporary Construction Area primarily by rail rather than by road. However, to operate the Secondary Temporary Construction Area we do also require a means of secondary road access for purposes such as establishing (and then decommissioning and restoring) the Secondary Temporary Construction Area and to allow materials and/or spoil to be delivered and/or removed from the area in the event that such delivery and/or removal by rail is not reasonably practicable. Where such road access is required construction vehicles would need travel along Mill Lane in order to access the Secondary Temporary Construction Area via Archer Street and Spring Street.

However, where construction vehicles are required to use Mill Lane to access to and from the

Secondary Temporary Construction Area via Archer Street and Spring Street, it is our intention that any such use of Mill Lane by construction vehicles would be managed so as to avoid using Mill Lane during drop off and pick up times at Milton St Johns CE School (“the School”). We will engage with the School to understand what periods of time pick up and drop off are so that these timings can then be incorporated into the construction planning.

In addition, to facilitate any required construction vehicle access to the Secondary Temporary Construction Area via Archer Street and Spring Street, we have also included within the Order (**NR02**, see Part 1 of Schedule 15) the ability to introduce Temporary Traffic Regulation Orders (TTROs) on Mill Lane, Archer Street and Spring Street. The purposes of these TTROs would be to enable the introduction of temporary restrictions to manage activities such as parking,

waiting and loading on these roads for a temporary period so, for example, to ensure sufficient passing provision for construction and other traffic using these roads. For further information regarding the location of these TTROs, please see sheet 6 of 15 of the Traffic Regulation Plans which are contained within the Deposited Plans and Section, Traffic Regulation Plans and Open Space Plan (NR09).

Mill Lane Underbridge construction works – Interface with Mill Lane

As part of the Scheme we will also be undertaking works at the Mill Lane Underbridge which will primarily consist of works to install new handrails and ballast retention works on the bridge structure above Mill Lane. Accordingly, to safely construct these works we will need to temporarily close sections of Mill Lane below and either side of the underbridge.

However, it is our intention that these works (and the related temporary road closures) will be programmed so that they are undertaken at weekends or week nights so as to limit disruption to access to the School via Mill Lane.

2 Construction traffic mitigation measures

In order to manage construction traffic we will, as detailed in section 10.5.1 of the Environmental Report, Volume 1 Main Report (NR14), be preparing a Construction Traffic Management & Travel Plan (“CTMP”). This CTMP will need to be submitted to and approved by Tameside Council in accordance with planning condition 7 which we have proposed is attached to our Request for Deemed Planning Permission (NR7) for the works to be authorised by the Order. Once the CTMP is approved by Tameside Council, planning condition 7 requires us to carry out the construction of our works in accordance with the terms of the approved CTMP.

The CTMP is a crucial part in managing the effects of construction traffic on the local highway network. In particular the CTMP will be used to identify and detail specific mitigations and controls which we will employ. These mitigations and controls include, but are not limited to:

- Establishing mandatory construction traffic routes to and from construction worksites, including prohibited routes for construction traffic – For example, establishing the construction traffic routes to be used for accessing the Primary Temporary Construction Compound on Manchester Road (A635), including access routes that are prohibited such as access routes via Mill Lane.

- Imposing time restrictions on the use of any construction traffic routes – For example, establishing controls that would restrict the use of Mill Lane by construction vehicles accessing the Secondary Temporary Construction Area during drop off and pick up times at the School.
- Detailing the requirement for the use of temporary traffic control measures – For example, detailing the requirements for the introduction of TTROs to temporarily manage parking on Mill Lane, Archer Street and Spring Street during periods when construction traffic is required to access the Secondary Temporary Construction Area.
- Outlining the detail of temporary road closures and diversions –For example, identifying the extent and duration of the required temporary closures of Mill Lane for the construction of the Mill Lane Underbridge works and the coordination of such closures with the other required temporary closures in the area.

3 Code of Construction Practice

Network Rail is committed to engaging with the local community during the construction works. If the Order is made by the Secretary of State, and before construction begins, a Code of Construction Practice (CoCP) will be required to be prepared for approval by Tameside Council in accordance with planning condition 6 which we have proposed is attached to our Request for Deemed Planning Permission (**NR7**) for the works to be authorised by the Order. The CoCP will include (as required by planning condition 6) an External Communications Programme which will set out how Network Rail will communicate with the local community during the construction period. As part of this programme Network Rail is committed to providing the School, and the local area, prior communication as regards any works taking place on Mill Lane.

4 Emergency Access

Network Rail has and will continue to engage with the emergency services about the proposed works, and in particular the measures to be included in the CTMP. Therefore we can confirm that emergency vehicle access to the School and nearby homes will not be prevented by virtue of the construction of our works.

All application documents can be viewed on the Network Rail website [Stalybridge to Diggle \(Saddleworth\) scheme - Network Rail](#) If you would like a meeting to discuss the above, please let me know. However, if you are satisfied with the information

given, we hope that you can withdraw the objection to the Order application. If that is the case, please could you email the Transport Infrastructure Planning Unit at [@TRANSPORTINFRASTRUCTURE](#) informing TIPU of your decision to withdraw the objection.

Yours sincerely,

Penny Carter **Network
Rail**

Network Rail Infrastructure Limited Registered Office: Network Rail, 2nd Floor, One Eversholt Street, London, NW1 2DN Registered in England and Wales No. 2904587 www.networkrail.co.uk



Exhibit CW3)

Network Rail (Stalybridge to Diggle (Saddleworth) Enhancements) Order
Environmental Report under 2025

Purpose of this Environmental Report

1 This Report includes the findings of an environmental appraisal as required following the Screening Decision letter [NRI 31, with technical note appendices provided in Volume 3 and additional information provided in Volume 4 that serve to address feedback from statutory bodies, in addition to other requirements regarding the environment. This Report presents consideration of the following 9 topics, with each topic being addressed for each relevant works element of the Order Scheme as applicable:

- Chapter 5 - Cultural Heritage and Archaeology;
- Chapter 6 - Ecology;
- Chapter 7 - Landscape and Visual;
- Chapter 8 - Arboriculture;
- Chapter 9 - Noise and Vibration;
- Chapter 10 - Traffic and Transport;
- Chapter 11 — Geoenvironment;
- Chapter 12 - Water environment; and
- Chapter 13 - Air Quality.

2 The following topics were considered as part of this appraisal; ecology; water environment; traffic and transport; landscape and visual; cultural heritage; geoenvironment; noise and vibration; and air quality. **No technical studies have been undertaken for materials and waste, population and human health and climate change as no significant impacts were anticipated, and any impacts that were to arise in relation to these topics would be managed through Network Rail's Environment and Social Minimum Requirements for Projects — Design and Construction** (NR/L2/ENV/015), which is included as Volume 3, Appendix IA of this Report [NR14]. The rationale for the descope of these topics is further detailed in the Screening Decision letter document [NR13].

3 For each environmental topic, consideration has been given to applicable legislation, policy and guidance, and an appraisal of impacts and effects undertaken for each relevant works element. Consideration of environmental topics in this way has helped to enable impact avoidance and mitigation measures to be incorporated into the Order Scheme design to minimise associated effects.

4 With respect to construction-related impacts and effects on the environment, a Code of Construction Practice (CoCP) will be prepared and the measures set out within this will be implemented to address relevant Order Scheme impacts, ensuring that works are appropriately managed and impacts and effects reduced where feasible.

Exhibit CW4)

Personal Statement for Public Appeal

To be read aloud on behalf of Vicky Pearson

My name is Vicky Pearson, and I have lived on Archer Street since 1995. I moved here from Moston in Manchester because I needed a quieter, more peaceful place to manage my mental health. Mossley has always given me that sense of calm, a small town surrounded by hills and greenery, where you see familiar faces and feel far away from the noise and pressure of busy built-up areas. Archer Street has been my home for nearly three decades, and it is the only place where I have ever felt settled and safe.

Since 2020, my mental health has become more difficult to manage. My recovery from each episode is slower, and the impact on my daily life has become more severe as I've gotten older. Noise is one of my biggest triggers. When there is sudden or persistent noise, I can become overwhelmed very quickly. My behaviour and mood can change without warning, and I often don't realise how I'm feeling until I'm already outside interacting with people.

There are days when I struggle to function at all. Some days I cannot get dressed or wash. Any change in my environment can affect me physically, sweating, vomiting, or feeling intense pressure in my head. When things feel out of control, my thoughts can become very difficult to manage. I rely heavily on routine, stability, and quiet surroundings to stay well.

Brookfields has been the one constant in my life for the last 30 years. It is the only place that has never changed. I visit every day as part of my routine, and I also go there whenever I feel overwhelmed, sometimes even in the early hours of the morning when I cannot sleep. I only have to walk to the end of my street, and I can sit among the trees and listen to the birds. The peace and stillness help me calm my mind and bring balance back when everything feels chaotic inside.

For those who may not know the area, Brookfields is a small but unique patch of land with a footpath that links bottom Mossley to top Mossley. The path itself is lined with trees and used by the public to walk from one part of town to another, but the surrounding space is what makes it so important to me. On one side there is enclosed land filled with trees and natural cover, and on the other side there is open woodland leading down towards the car park. The enclosed area is home to badgers, deer, squirrels and bats. Because this part of the land is rarely used by the public, it provides quiet, sheltered spots where I can sit safely away from people when I am overwhelmed. From the end of my back yard, there is a small, enclosed section that hardly anyone ever goes into, and this has become the place where I can calm myself without fear of

being disturbed. This is completely different from the canal area, which is open, exposed, busy with foot traffic and dogs, and not a safe or suitable environment for me when I am struggling.

Brookfields is not just a green space to me. It is my safe space. It is where I go to regulate myself, to stop my thoughts spiralling, and to prevent my behaviour from escalating. I can sit there for hours if I need to. It is the only place where I feel grounded and connected to something steady. I have become protective of it because it plays such a vital role in keeping me well.

Losing access to Brookfields would be devastating for my mental health. People might say that the canal or the river are nearby, but they are not safe or suitable alternatives for me. They are open, exposed, busy with dogs, and I would not feel safe walking there at night when I am struggling. Brookfields is the only place I can reach quickly, safely, and quietly at any time of day.

The proposed construction access routes and the disturbance to Brookfields would have a serious impact on my wellbeing. The noise, the heavy vehicles, and the fear that the vibrations could affect my already damaged house all increase my anxiety and push me backwards in my recovery. I used to be a high-functioning person with mental health challenges; I supported others and contributed to the community. I still want to get back to that place. But the level of disruption being proposed would make that impossible for me.

I want to be clear: I am not against the improvement of the railway or the new station. I think it will be a positive thing for Mossley. But the access routes and the plans for Brookfields need to be reconsidered. This is not just about me, it affects residents, homes, safety, and the wildlife that has made this green space its home. Brookfields brings joy and stability to many people, and for some of us, it is essential to our wellbeing.

I am asking the panel to understand the real human impact this will have on my life and to protect the one place that has kept me steady for nearly three decades.

Kind regards

Vicky Pearson



Exhibit CW5 – Brookfields: Ground Damage (2021)

Evidence of the adverse impact on the landscape, supporting the case against the use of these routes for construction access. Please note the Geo sense monitor used for the purpose of moving bedrock.



Exhibit CW5 – Brookfields: Ground Damage (2021)

Evidence of severely damaged and waterlogged ground following previous construction traffic. A construction compound would significantly worsen these risks, increasing the likelihood of further deterioration and safety concerns.

