

My evidence primarily relates to points made by NR in the Rebuttal of Proof on 29/5/26.

See Exhibit 1

It mainly concerns the 2 matters that they have addressed , a few more notes for consideration and some areas where compromises could be agreed upon for mutual benefit.

In Para. 2.1.2

The point i would like to make is it is not necessary to install a hard stone road, [Temporary Running Surface] from Spring St. if, as you state,

In Para 2.1.3

It will only be needed for “ foot access and small plant “.

Recently when preliminary work was carried out on Brookfields , a caterpillar tracked mini excavator and a drilling rig were used with access gained from from the side of Archer St., Exhibit 2 Black dotted line.

Shows the location of the previous access track.

This work was carried out without the need to construct a road, temporary or otherwise.

Exhibit 3

The picture shows the track, now becoming overgrown, used for access which is only 20 meters from Archer St. kerb to the footpath on Brookfields.

If large vehicles need access for breakdowns , recovery of plant or larger vehicles [excavators etc.] they can and should gain access from one of the RRAPs being installed North and South of the new station. If access is needed while the line is active a temporary Level Crossing should be [installed](#).

A Manually Controlled Gated Crossing would give constant access to Brookfields from the track side for vehicles and plant of any size at any time without disrupting the running of trains.

At present there are approximately 6,000 Level Crossings in use in the UK giving safe crossing points for vehicles of all sizes and speeds.

In Par.2.1.4

Exhibit 1

The term “ not envisaged “ is used but this does not categorically rule out the use of HGVs from the Mill Ln. side of Brookfields. So, if allowed, they could then do so with impunity when they deemed it necessary.

Yet it then goes on to state that “ the surrounding roads in this area are not suitable for such large vehicles “.

Exhibit 1

They have repeatedly used the term “ vehicles no bigger than a standard bin waggon will be used “ but bin waggons are HGVs as you need an HGV licence to drive one.

Q How do you remove a broken down excavator with a small vehicle ?

Para. 2.1.5

States that “ the access route location to follow existing made path |” See previous comments on foot access and small plant. i.e. No long hard road is necessary, previous access was from Archer St. via a short track. Exhibit 2 and 3

Par 2.1.6

This states that “ access route can be “ Largely “ constructed from the railway “ which indicates that some of it would have to be constructed from Mill L./ Spring St. side.

Q. What construction vehicles and plant would then be needed from Mill lane and Spring St. side, would they be “ up to but no bigger than a standard bin waggon ?

Para. 2.1.7

The whole of Brookfields is very wet all year round not just in winter as it contains constantly flowing natural springs.

Exhibit 5 and 6

This shows a constant flow of water even in heatwave and drought conditions.

These conditions makes it unsuitable for a “ temporary road “

The lower side of Brookfields has also been the site of a landslide , after sustained heavy rainfall, which landed on the East bound track ,closing it for a time.With the increase in extremes of weather , especially high volumes of rainfall, it is highly likely that an event like this could happen again in the future .

Q If this new road were to be built would it then be removed after the completion of the Station , even if the landowner wanted it to be left in ?

My reason for asking is that there have been repeated attempts in the past to build on Brookfields that have all been rejected due to the unsuitability of Mill Ln. as the only access route onto the site.

Q Why is the removal only “ Largely undertaken from the railside “ if the Spring St. side is” only for foot access and small plant “

Matter 2

Para 2.1.8

Exhibit 7

A parking and drop off area on Spring St. will massively increase the volume of traffic there and .at the junctions making them both even more dangerous. Mill Ln, is only 4 meters wide and Carhill Rd. is only 4.2 meters. At the junctions.

Exhibit 8 and 9

Like Mill Ln. Carrhill Rd is already congested with parked cars all the time making it impossible for two vehicles to pass on most of its length.

Exhibit 10 and 11

It also has , at both ends, junctions with Stockport Road which are narrow , single track, steep, tight and blind summits.

Exhibit 12

Shows a food delivery vehicle which takes up most of the available road space.

Exhibit 13

Shows it leaving via the Mill Ln./Carrhill Rd junction. At this point the road is only 4 meters wide.

Exhibit 14

Shows it travelling back up Carrhill Rd. Most of this section of road does not have footpaths on both sides and where there are some they are very narrow making them dangerous for pedestrians.

Exhibit 15

Shows a pedestrian , mother and child in a buggy , who has to walk in the road as the footpath was blocked.

Exhibit 16

Q Can you confirm that Mill Ln. and Carrhill Rd. roads will also be used for the access to the compound at the end of Woodbank Terrace.?

Woodbank Terrace and Milton View road are the only means of vehicle access to that compound . If so , this will further increase the volume of traffic on Mill Ln.. and Carrhill Rd..

Exhibit 2 Area shaded Black

There is another area of land, the site of the old Sykes coal yard, adjacent to the new station compound which should have been considered for use, at the junction of Manchester Rd./Mill Ln. which would be accessible from a flat main A road and not from steep narrow side streets. This area is larger than the Blue Hatched area on the map.,

Para 2.1.10

Exhibit 16

States that you are “ not seeking to use large construction vehicles or HGVs on these narrow roads “ if that is the case then why are there still TTROs in place on Archer st. ?

Even though they have been omitted from the revised map. See Exhibit 2

It has been previously stated by you ,

Exhibit 2 and 3

“ that access on foot and by plant , mini diggers and a drilling rig, to Brookfields has been carried out already” , without the need for TTROs or the laying of a new road.

Q Why are the TTROs necessary on Archer St. now ?

Exhibit 2 dotted line and 3

The track used by the work force last time is still visible, but becoming overgrown, and runs from Archer St. kerb to Brookfields footpath. A short distance of 20 meters and goes directly to the site of the new station compound via the existing public footpath.

If the residents of Archer St. are to be stopped from parking outside their own homes can you suggest where else they would be able to park as there is absolutely no alternative parking in the area.

Summary

If you really are not going to use HGVs for the delivery and removal of spoil , plant and materials then the increase in smaller vehicles will be huge. Smaller Vehicles = more trips.

All vehicles using Mill Ln. Spring St. Archer St. Woodbank Terrace/Milton View will need to access them via Carrhill Rd. As mentioned earlier this route is also unsuitable and is regularly the site of dangerous incidents.

My objection is not to the work proposed in general but to the method of carrying it out, so it remains in place, as I don't consider enough has been done to alleviate the dangers associated with the extra traffic on already dangerous roads.

Exhibit 8

We see, as a daily occurrence ,vehicles driving along the pavements as its the only way to pass other traffic and repeated conflict at the road junctions. Please note these exhibits were all taken after 9 am and over a short period of time.

Also , this is the only vehicle access to Milton St. Johns School . I believe that Network Rail are putting access preferences before residents and public safety.

There are alternative ways of achieving completion of the works that should be considered that would actually benefit the community in the long run and still allow the construction to go ahead more safely than is being proposed.

Exhibit 2 Black shaded area.

1. The use of a drop off and parking area on the land at the junction of Manchester Rd/ Mill Ln. The car park to be retained after completion of works to alleviate some of the problems the residents of Manchester Rd. with the loss of their parking places. Which is a highly contentious issue in itself.

Exhibit 2 Black line and 18

2. Foot access to Brookfields only from Spring St.

And, if it is still deemed necessary, the hard standing car park that is being proposed for the drop off area for staff to be extended from 3 Spring St. to 19 Archer St.. on the South side of

Spring St and the edge of Brookfields and to be retained after completion for the use of local residents.

3. No TTROs on Archer St. as there is no alternative parking available.

If these points were agreed upon and guaranteed then and only then would I consider removing my objection.