



**NETWORK RAIL
PROPOSED CHANGE IN SPEED LIMIT &
PEDESTRIAN ROUTE
A670 OLDHAM ROAD, UPPERMILL**

STAGE 1/2 - ROAD SAFETY AUDIT

FEBRUARY 2026



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Report title:	Network Rail Proposed Change in Speed Limit & Pedestrian Route A670 Oldham Road, Uppermill Stage 1/2 - Road Safety Audit
Date:	12th February 2026
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Prepared by:	Martyn Parr - Mayer Brown Ltd
On behalf of:	Oldham Council
Status:	Final

Network Rail
Proposed Change in Speed Limit & Pedestrian Route
A670 Oldham Road, Uppermill
Stage 1/2 - Road Safety Audit

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1 Introduction

- 1.1 This report results from a Stage 1/2 Road Safety Audit undertaken following instructions from Mayer Brown Limited's Leeds office, on behalf of Oldham Council (the Overseeing Organisation).
- 1.2 This Road Safety Audit has been requested following the proposed extinguishment of a rail level crossing (MVL3 13m 26c Moorgate Halt) and Public Footpath No. 209SADD at Uppermill, Oldham. As a result of the closure, pedestrians will be required to use an alternative route, part of which includes the section of the A670 Oldham Road subject to this Audit.
- 1.3 The highway works subject to this Road Safety Audit comprise the relocation of the existing speed limit change (20mph/30mph) on the A670 Oldham Road to the south side of the existing Public Footpath (sited between No. 6 & No. 8) on the west side of Oldham Road.
- 1.4 Furthermore, the Audit Team has been requested to consider the anticipated increase in pedestrian movements on the west side of Oldham Road, between the Public Footpath and the Huddersfield Narrow Canal located further to the north. In particular, attention has been given to the narrow section of footway adjacent to the Public Footpath and whether this presents any road safety concerns.
- 1.5 The Road Safety Audit took place during January and February 2026.
- 1.6 The Road Safety Audit comprised an examination of the information provided by Mr Steven Overton at Mayer Brown Limited's Leeds office (Design Team), given as **Appendix C** in this report.
- 1.7 The Overseeing Organisation is Oldham Council.
- 1.8 The Road Safety Audit Team membership was as follows:

Team Leader

Martyn Parr	MSoRSA, MCIHT, NHCoC
	Road Safety Manager – Mayer Brown Limited

Team Member

John Reid	MSc, DipHTE, NHCoC
	Technical Director (Safety) – Mayer Brown Limited

David Rickard MCIHT, MIHE, MIET

Principal Engineer – Mayer Brown Limited

- 1.9 A site visit was undertaken on 15th January 2026 from 16:00 hrs onwards, during which the weather was overcast, and the existing road surface was damp. Traffic conditions were moderate; a low number of pedestrians were observed; no pedal cycles were seen during the site inspection.
- 1.10 The terms of reference of the Road Safety Audit are as described in GG119. The Road Safety Audit Team has examined and reported only on the road safety implications of the scheme as presented and has not examined or verified the compliance of the designs to any other criteria.
- 1.11 The Audit Team are not advised of any Departures from Standard.
- 1.12 The Audit is concerned only with the Section 278 works that are to be adopted by Oldham Council.
- 1.13 All comments and recommendations are referenced to a reduced scale copy of drawing 'NRMOORGATE.2/01', provided in **Appendix B** of this report.

2 Items Raised at Previous Road Safety Audits

- 2.1 The Audit team are not aware of any previous Road Safety Audits having been carried out on the scheme proposals.

3 Items Raised at the Stage 1/2 Road Safety Audit

Non-Motorised Users (NMUs)

3.1 Problem

Location: A670 Oldham Road, west side (please refer to reference point 3.1 in Appendix B).

Summary: Insufficient footway width.

The west side of Oldham Road, between the Public Footpath (sited between No. 6 and No. 8) and the Huddersfield Narrow Canal, will form part of the proposed alternative pedestrian route, following the proposed extinguishment of a rail level crossing and Public Footpath No. 209SADD.

The Audit Team are concerned that a circa 10m length of existing footway on the west side of Oldham Road, immediately to the north of the Public Footpath identified, is very narrow and is considered insufficient in width. As a result, it is likely that either pedestrians could stray into the northbound lane of the carriageway, or southbound pedestrians will need to cross over to the south side utilising the existing uncontrolled crossing, proceed southbound, and then crossing back over to the west side opposite the Public Footpath, and vice-versa for northbound pedestrians.

The Audit Team acknowledge the land constraints at this location and accept that it might not be cost effective or practical to widen the narrow footway identified. Although this would be the preferred option if practical.

It should also be noted that this alternative pedestrian route would not be accessible or recommended to mobility or vision impaired pedestrians due to the uneven ground and steps that form part of the route to the west of Oldham Road. On this basis, the following recommendation is based on only able-bodied pedestrians being able to utilise this section of the proposed alternative route.

Recommendation

It is recommended that:

- a. If practical and cost proportionate, provide a minimum 1.2m width footway on the north side of Oldham Road, to the east of the Public Footpath identified. If this is not practical, then:

- b. Provide advanced warning sign (Diag 544.1) to the south of the Public Footpath, facing northbound traffic, to warn road users to anticipate pedestrians in the carriageway.

3.2 Having carefully inspected the site and adjacent highway links and roadside environment and observed road user behaviour, the Auditors consider that, no material increase in risk to road users will arise as a result of the proposed relocation of the change in speed limit.

4 Audit Team Statement

Audit Team Statement

4.0 We certify that this Road Safety Audit has been carried out as described in GG119.

Road Safety Audit Team Leader

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Signed



Date 12/02/26

Road Safety Audit Team Member

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Date 12/02/26

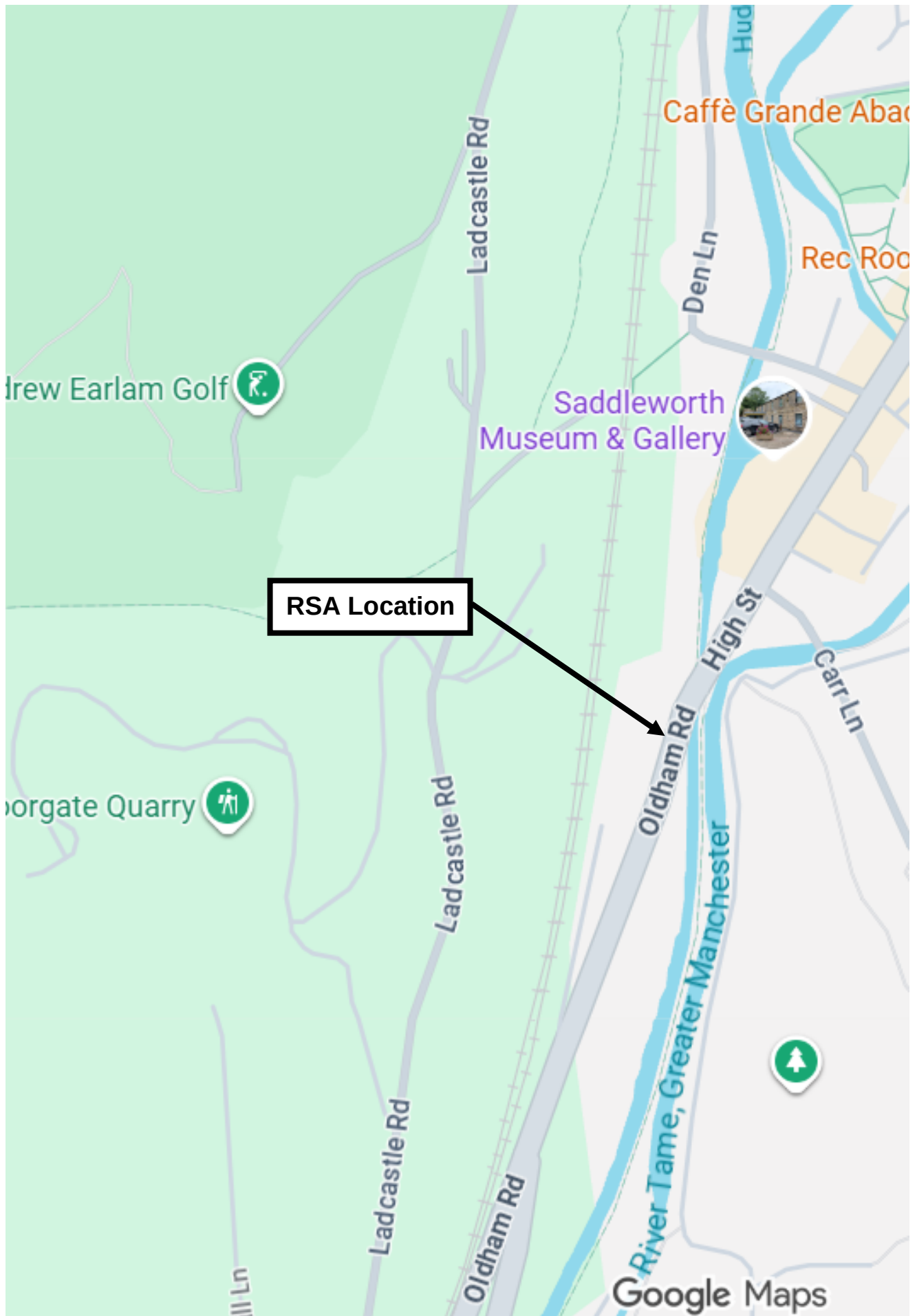
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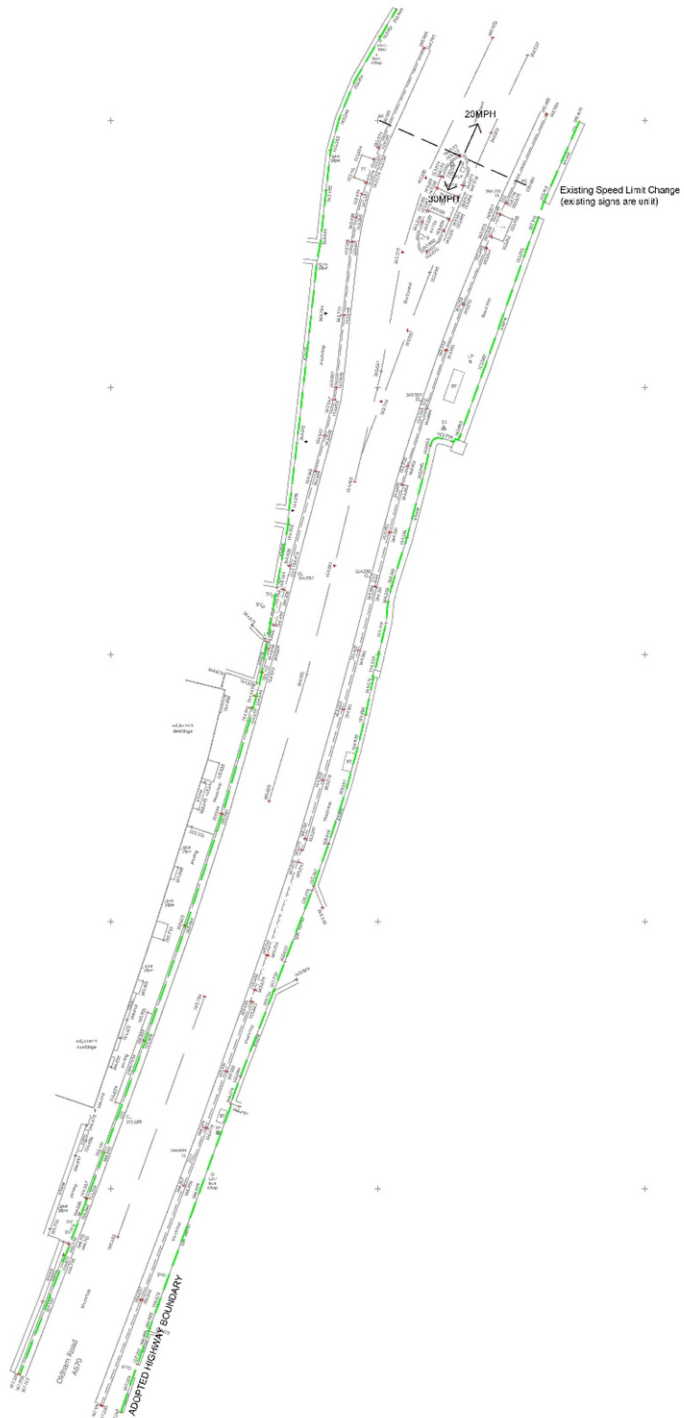
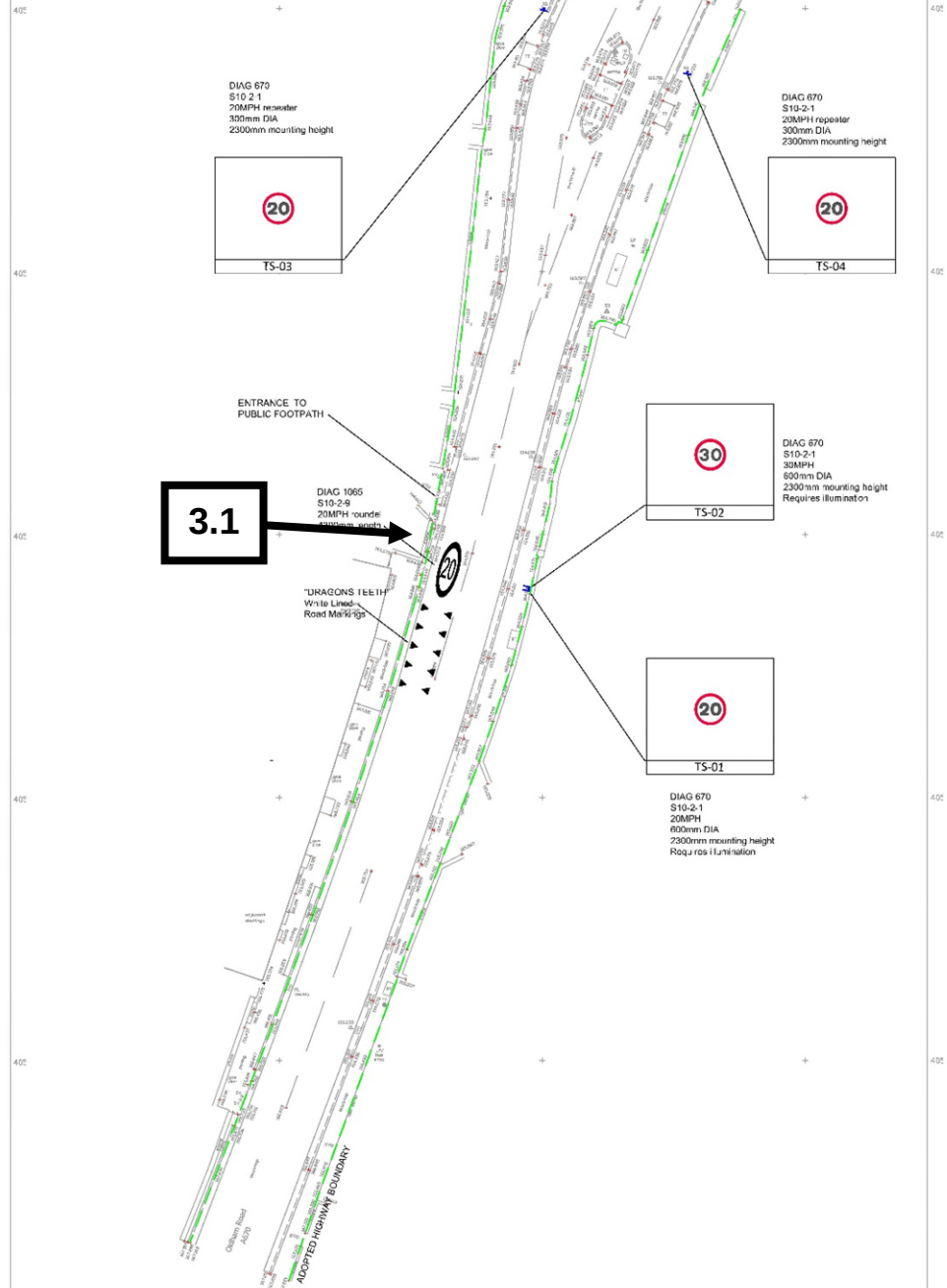


Date 12/02/26

APPENDIX A: Site Location Plan



APPENDIX B: Reference Plan



KEY TO HEALTH AND SAFETY SYMBOLS

- INDICATES A RESIDUAL RISK REQUIRING A COMPULSORY ACTION
- INDICATES A RESIDUAL RISK FOR INFORMATION
- INDICATES A RESIDUAL RISK REQUIRING A PROHIBITIVE ACTION
- INDICATES A RESIDUAL RISK AS A WARNING

PRELIMINARY

P1 Initial Issue 15/12/2025

rev. amendment check/rev. date

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Client
NETWORK RAIL

Project
OLDHAM ROAD (A670), UPPER MILL

Scale
1:200
Drawn by
SO
Checked by
SW
Date
DECEMBER 2025
Card Ref
NRMOORGATE.2_04.DWG

Title
POTENTIAL RELOCATION OF
CHANGE IN SPEED LIMIT

Mayer Brown Limited Jobcode
NRMOORGATE.2
Rev/Rev
P1

Drawing number
NRMOORGATE.2/01

APPENDIX C: Other Supplemental Information Provided for Audit



NETWORK RAIL

**CLOSURE OF LEVEL CROSSING
MOORGATE STREET, UPPERMILL, OLDHAM**

GG104 SAFETY RISK ASSESSMENT

SEPTEMBER 2025



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Report title:	Network Rail Closure of Level Crossing Moorgate Street, Uppermill, Oldham GG104 Safety Risk Assessment
Date:	September 2025
Document reference and revision:	NRMOORGATE.2
Prepared by:	Steven Overton – Mayer Brown Ltd
Approved by:	Sean Wotherspoon – Mayer Brown Ltd
On behalf of:	Network Rail
Status:	FINAL

Network Rail
Closure of Level Crossing
Moorgate Street, Uppermill, Oldham
GG104 Safety Risk Assessment

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Appendices

Appendix A: Table D.1 - Hazard Identification & Risk Assessment Matrix

1 Safety Risk Assessment Planning

Background

- 1.1 Mayer Brown have been appointed by Network Rail to carry out a Safety Risk Assessment (SRA) related to the proposed extinguishment of a Rail Level Crossing (MVL3 13m 26c Moorgate Halt) and Public Footpath No. 209SADD at Uppermill, Oldham and the resultant diversion of pedestrian movements.
- 1.2 This report should be read in conjunction with Mayer Brown's Highways Statement, dated July 2025, which details the proposed extinguishment and subsequent re-routing of pedestrians and also makes recommendations for potential highway improvements to form the mitigations referred to later in this report.
- 1.3 The re-routing of pedestrians onto the public highway is classed as a modification to the highway network and thus could be considered to be an Activity that has a "direct" influence on safety risk.
- 1.4 This SRA is concerned only with the re-routing of pedestrians onto the highway network and the potential effect on road user safety in the vicinity.
- 1.5 Note that the SRA process as defined in GG104 relates to the National Strategic Road Network and therefore refers to National Highways as the Overseeing Organisation and references the impact on the Motorway and Trunk Road Network. Where those terms are used in the reference material (tables) within this report, the Overseeing Organisation should be interpreted as Oldham Council, and the infrastructure affected should be interpreted as the Adopted Public Highway.

Define the Question

- 1.6 The question this SRA seeks to answer is whether the Activity of "re-routing pedestrians from the public footpath onto the adopted highway network is detrimental, in road safety terms, to the existing situation".

2 Categorisation of Activity Type

2.1 The categorisation has been assessed in line with Table E/2.7 Categorisation of activity type, as set out in GG 104 as follows:

Feature	Selection criteria	
	Type	Indicator
<p>Extent of prior experience of activity.</p> <p>The degree of knowledge available from undertaking the activity previously or the degree to which knowledge is available from the activity being undertaken by other industries or organisations.</p>	A	Activities for which there is significant experience within National Highways. Previous safety studies and data are available, and some activity features are codified in a standard or formal procedure.
	B	<p>Activities for which there is limited experience within National Highways but there is transferable experience and previous safety studies and data are available elsewhere in the UK or internationally. Activities for which there is limited experience in National Highways but there is experience and previous safety studies and data are available elsewhere in the UK or internationally, including in different industries, which is deemed sufficiently similar to the activity in question to be deemed relevant.</p> <p>Activities for which there is experience within National Highways but that experience and previous safety studies and data that are available are in a different application of the activity and some adaptation will be required. There might also be local and site specific issues to take into account that can affect the relevance of the available experience.</p>
	C	Activities for which there is no previous applicable experience from either National Highways or other industries.

Categorisation of Activity: Type A

Reason: There is ample knowledge and experience within the industry of this type of Activity.

<p>Statutory and formal processes and procedures (including standards and legislation).</p> <p>Consideration of the applicability of current standards, formal processes or procedures, guidance and legislation.</p>	A	<p>The activity is substantially or entirely within the scope of existing standards, guidance, formal processes or procedures and applicable legislation.</p> <p>The activity requires minimal or no safety related departures from standard or safety related changes to formal processes or procedures (including any legislation).</p> <p>The nature and type of a departure is the most important element in determining the categorisation and so a single safety departure may change this.</p>
	B	<p>The activity is largely within the scope of existing standards, guidance, formal processes or procedures. There can be some safety related departures from standards needed and/or safety related changes to formal processes or procedures.</p> <p>The activity can need minor changes to existing legislation.</p> <p>Whilst the number of safety departures from standards, formal processes or procedures can affect the categorisation, the most important element in determining this is the nature and type of the departures.</p>
	C	<p>Activities that are not within the scope of existing standards, formal processes or procedures and require new ones to be developed.</p> <p>Activities for which significant departures from standards, formal processes or procedures are required.</p> <p>Activities which require significant changes to existing legislation or new legislation to be written.</p> <p>Whilst the number of safety departures from standards, formal processes or procedures can affect the categorisation, the most important element in determining this is the nature and type of the departures. For example, a large number of safety departures that can be addressed straightforwardly will have less impact on feature type than a single safety departure that cannot and requires a detailed risk assessment to support it.</p>

Categorisation of Activity: Type A

Reason: There are no departures from standard required relating to the Activity.

<p>Impact on the organisation.</p> <p>The effect that the activity will have on current National Highways processes, procedures, structure, roles and responsibilities, competencies, policies and strategy, in addition to contractual and workforce arrangements.</p>	A	<p>The activity has no impact on National Highways.</p> <p>The activity has a minor impact on any of these for a finite period of time.</p> <p>Length of time National Highways is affected by decision to undertake the activity is short term.</p>
	B	<p>The activity can lead to permanent minor changes to any of these. These minor changes can introduce new roles and responsibilities, policies, contractual and workforce arrangements.</p> <p>The activity can require a change to organisational arrangements.</p> <p>Length of time National Highways is affected by decision to undertake the activity is medium term.</p>
	C	<p>The activity has significant impact on any of these.</p> <p>The activity can change core safety roles and responsibilities.</p> <p>Length of time National Highways is affected by decision to undertake the activity is long term.</p>
<p>Activity scale.</p> <p>Consideration of the size and/or scale of the activity, including geographically and range of possible impacts.</p> <p>Does or can the activity have an impact on the motorway and all-purpose trunk roads, either directly or indirectly.</p>	A	The impact of the activity is limited in nature or scale.
	B	The impact of the activity is significant in nature or scale.
	C	The impact of the activity is wide ranging across the network, and/or significantly impacts infrastructure, interventions or workforce.
<p>Technical.</p> <p>Measure of technical and/or technological novelty and/or innovation the activity involves</p>	A	An activity where any processes, techniques, methodologies and/or technologies involved are currently in widespread use, available for reference, and re-examination is unlikely to be needed.
	B	<p>There can be some experience of the processes, techniques, methodologies and/or technologies, available for reference.</p> <p>The experience can be from use in either another application, or by another road authority, supplier, industry or perhaps from overseas in which case some additional work can be required to adapt them and/or to demonstrate that safety can be assured for the intended application.</p>
	C	Activities that use new processes, techniques, methodologies and/or technologies for which there is no previous experience in the UK or elsewhere.

Categorisation of Activity: Type A

The re-routing of pedestrians will have no impact on Local Authority processes, procedures, structure, roles and responsibilities.

Categorisation of Activity: Type A

The re-routing of pedestrians is considered a minor, localised alteration that is limited in scale and impact on the highway network.

Categorisation of Activity: Type A

The re-routing of pedestrians is covered by relevant design standards.

<p>Stakeholder impact and interest.</p> <p>The quantity and/or impact of stakeholders, and their interest in terms of safety risk and resulting ability to influence or/impact on the activity.</p> <p>The degree to which the safety issues, as perceived, are capable of being understood and fully addressed.</p>	A	Activities for which the quantity and/or impact of stakeholders, and their interest in terms of safety risk and resulting ability to influence or impact the activity is low.
	B	Activities that have only a single or a few stakeholders but their impact, in terms of their attitude towards, or ability to influence, and/or interest in the successful achievement of the activities aim in terms of safety risk can be significant. Alternatively it will represent an activity that has several stakeholders but the amount, or type, of safety issues involved are limited.
	C	Activities for which there are a large number of stakeholders and their impact in terms of their attitude towards, or ability to influence safety can be significant. Stakeholders with a strong interest in the potential safety impact of the activity on themselves. Activities where there are conflicting needs arising from different stakeholders or stakeholder groups.

*Categorisation of Activity: **Type A***

Reason: The activity has a low number of stakeholders.

2.2 overall category type for the activity is determined as set out in Table E/2.8.1 of GG 104, as follows:

Feature classifications	Type	Comments
All type A	A	Where all activity features are categorised as type A then the entire activity is type A.
All type B	B	Where all activity features are categorised as type B then the entire activity is type B.
All type C	C	Where all activity features are categorised as type C then the entire activity is type C.
Three or more features categorised as Type A	A	Where three or more features are categorised as type A but the remaining features are categorised as a combination of type B and C, the activity is categorised as type A but the features categorised as B or C require a greater rigour of analysis, assessment and evaluation.
Three or more features categorised as Type B	B	Where three or more features are categorised as type B but the remaining features are categorised as a combination of type A and C, the activity is categorised as type B but the features categorised as C require a greater rigour of analysis, assessment and evaluation.
Three or more features categorised as Type C	C	Where three or more features are categorised as type C then the entire activity is of type C.
Equal distribution of categories across features (no majority)	A/B/-C	Where the categorisation of activity features results in an equal distribution between two or more category types the decision on the overall activity categorisation is governed by the importance of each feature relative to the activity. If this results in a decision to select the overall activity categorisation as the lower category type, the features that were identified with the higher category type require a greater rigour of analysis, assessment and evaluation, as well as governance.

2.3 With reference to Table E/2.8.1 in GG104, the re-routing of pedestrians (referred to for the purposes of the SRA as the “Activity”) is considered a Category **Type A** activity, as there are no elements of the proposal that fall outside the scope of normal Highway Authority works; does not require special legislation or design standards; has minor impact on the Highway Authority as an organisation; is limited in scale of works; does not require special technologies and there is a very low impact to stakeholders.

3 Identification of Affected Populations

3.1 Populations on the motorway and all-purpose trunk roads shall be classified as shown in Table E/1.4 of GG 104, below:

Population	Classification
People directly employed by National Highways either permanently e.g. traffic officers, or periodically e.g. those undertaking site visits; and people in a contractual relationship with National Highways, including our national vehicle recovery contract operatives, all workers engaged in traffic management activities and incident support services, and any other activities such as persons carrying out survey and inspection work.	Workers
All road users, including but not limited to the emergency services, equestrians, cyclists and pedestrians, as well as those others who are at work but are not in a contractual relationship with National Highways such as privately contracted vehicle recovery and vehicle repair providers.	Users
'Other parties' includes any person or persons who could be affected by the National Highways motorway and all-purpose trunk roads, but who are neither using it, nor working on it e.g. living or working adjacent to the motorway and all-purpose trunk roads, or using other transport networks that intersect with the motorway and all-purpose trunk roads.	Other parties

3.2 Populations that could be affected by the Activity are 'Users' of the highway network (i.e. motorised, and non-motorised users).

4 Safety Risk Assessment Scope

- 4.1 The scope of the Activity is re-routing of pedestrians onto the Adopted Public Highway.
- 4.2 This assessment is to analyse the risk to the identified populations affected by the scheme proposals.
- 4.3 Road users (motorised and non-motorised) travelling on the roads onto which pedestrians are being re-routed could be affected by the Activity.
- 4.4 Other parties are unlikely to be affected.

5 Safety Baseline & Safety Objective

Safety Baseline

- 5.1 The safety baseline is the current number of collisions recorded in the last five years in the immediate vicinity of the proposed Activity.
- 5.2 A review of the Transport For Greater Manchester online Interactive Map shows no recorded collisions in the last 5 years along the length of highway onto which pedestrians will be diverted as a result of the proposed Activity.
- 5.3 There are 2 no. collisions shown on High Street, between Moorgate and Bridge Street (1 serious, 1 slight) but this length of highway is not proposed to be traversed by pedestrians diverted by the activity, as at this point they are proposed to be traversing the off-highway towpath alongside the canal.

Safety Objective

- 5.4 The safety objective is to understand the risk to road users on the A670 High Street due to the proposed increase in pedestrian movements resulting from closure of the level crossing and public footpath, and to limit new subsequent risks to road users.
- 5.5 Potential hazards are assessed against GG104 Table E/C.1 (Likelihood x Severity = Risk), with resulting Matrix included in **Appendix A** to this report. A summary of the hazards is set out below.

Hazards relating to the adopted highway:

- 5.5.1. Narrow footway alongside A670, adjacent the entry to the Public Footpath used by the alternative route.

Hazards off adopted highway but to be considered due to their inclusion on the proposed alternative route:

- 5.5.2. Condition of the stone steps between Public Footpath and Ladcastle Road.
- 5.5.3. Condition of surface of Public Footpath on Alternative Route.

6 Conclusions

- 6.1 From the Risk Assessment Matrix included as Appendix A, the following conclusions can be reached.
- 6.2 The activity of re-routing additional pedestrians onto the A670 does require additional control measures to mitigate an increased risk level, as a result of the assumed additional pedestrian movements.
- 6.3 It is assumed that there are currently very few pedestrian movements at the location of the narrow footway on west side of the A670 and that the level of footway occupancy will increase relatively significantly as a result of the closure of the level crossing and public footpath.
- 6.4 Widening of the narrow A670 footway would reduce the risk level to a value below the existing risk level, however, the assessment confirms that the current risk to pedestrian users walking along the narrow footway and the risk value without any additional mitigations being implemented is no higher than '3' for both likelihood and severity. Table D1 confirms '3' is defined within the probability of 'very unlikely' and 'highly improbable'
- 6.5 Moving the location of the change in speed limit on the A670 will retain the risk level at existing levels.
- 6.6 Combining both mitigation measures (widening of footway and moving speed change in speed limit) would result in the greatest reduction in risk.
- 6.7 It is imperative that improvements to the stone steps and the surface of the public footpath onto which pedestrians are to be diverted are carried out, given the current level of risk calculated for these features.

7 Signatories

7.1 Decision Maker / Assessor:



Steven Overton – Principal Consultant (Design)

26th September 2025

7.2 Checked by:



Sean Wotherspoon - Director

29th September 2025

Appendix A: Table D.1 - Hazard Identification & Risk Assessment Matrix

Table D.1 Risk value, likelihood and severity of outcomes that may be assigned to qualitative data for the purposes of assessment

Likelihood (L) x Severity (S) = Risk value (R)		Severity (S)				
		Minor harm; Minor damage or loss no injury	Moderate harm; Slight injury or illness, moderate damage or loss	Serious harm; Serious injury or ill- ness, substantial damage or loss	Major harm; Fatal injury, major damage or loss	Extreme harm; Multiple fatalities, extreme loss or damage
Likelihood (L)	Very unlikely; Highly improbable, not known to occur	1	2	3	4	5
	Unlikely; Less than 1 per 10 years	2	4	6	8	10
	May happen; Once every 5-10 years	3	6	9	12	15
	Likely; Once every 1- 4 years	4	8	12	16	20
	Almost certain; Once a year or more	5	10	15	20	25
Risk Value (R)		Required action				
Low (1-9)		Ensure assumed control measures are maintained and reviewed as necessary.				
Medium (10-19)		Additional control measures needed to reduce risk rating to a level which is equivalent to a test of "reasonably required" for the population concerned.				
High (20-25)		Activity not permitted. Hazard to be avoided or risk to be reduced to tolerable.				

		Activity / Decision	Closure of level crossing and Public Footpath resulting in re-routing of pedestrian movements onto the Public Highway							Date: 26 th September 2025						
		Decision Maker / Assessor	Steven Overton, Principal Consultant, Mayer Brown Ltd	Existing Situation			Proposed Situation without Mitigation				Proposed Situation with Mitigation					
Ref:	Hazard / Risk Description	Populations Affected	Consequences	L	S	R	L	S	R	Response / Control Measure	L	S	R	Details of Assumptions	Monitoring Requirements	
5.5.1(a)	Narrow footway alongside A670, adjacent the entry to the Public Footpath used by the alternative route.	Road Users (motor vehicles and Pedestrians)	Potential point of collision between motor vehicles and pedestrians.	2	3	6	3	3	9	Widening of the A670 footway to a minimum of 1200mm, providing a betterment and adequate width for users to safely navigate the route. Recommendation 2 in the Highways Statement.	1	3	3	<p>The most recent collision data shows no collisions in this location, and it is assumed that there are very few pedestrians using the existing narrow footway given that it only provides access to a small number of residential properties before the footway terminates. The majority of pedestrians heading north-east / south-west on the A670 will use the footway on the east side of the A670, rather than the narrow footway on the west side. We therefore assume that a collision is currently unlikely, less than once per 10 years. We assume that if a pedestrian were to be in collision with a vehicle, then serious harm would be caused.</p> <p>With the additional pedestrians re-routed onto this section of footway we consider that the likelihood of a collision would increase, with the severity remaining the same.</p> <p>Introduction of a wider footway would reduce the likelihood of a collision between pedestrians and motor vehicles below that of the existing situation. The severity of such a collision would remain the same.</p>	The local highway authority should monitor collision data post re-routing of pedestrians to assess whether there is any increase in risk to the safety of road users and / or maintenance personnel.	
5.5.1(b)	Narrow footway alongside A670, adjacent the entry to the Public Footpath used by the alternative route (same hazard as above, different response / control measure).	As above	As above	2	3	6	3	3	9	Relocation of the change in speed limit on the A670. Recommendation 5 in the Highways Statement.	3	2	6	<p>Assumptions as 5.5.1(a) above.</p> <p>With the additional pedestrians re-routed onto this section of footway we consider that the likelihood of a collision would increase, with the severity remaining the same.</p> <p>Relocation of the change in speed limit from 30mph to 20mph to a point west of the junction of the public footpath and the A670 may not reduce the likelihood of collision but, should a collision occur, the severity should be reduced due to the reduced speed of the vehicles involved.</p> <p>It is assumed that the type of risk would change, but with no increase in overall risk.</p>	The local highway authority should monitor collision data post re-routing of pedestrians to assess whether there is any increase in risk to the safety of road users and / or maintenance personnel.	

5.5.2	Condition of the stone steps between Public Footpath and Ladcastle Road.	Public Footpath Users (non-motorised)	Slip, trip, fall hazard	5	3	15	5	3	15	The steep rough stone steps be replaced with concrete steps and handrails with compliant treads and risers. Recommendation 4 in the Highways Statement.	2	2	4	<p>The current condition of the stone steps is considered impassable by all but the most agile of pedestrians, and not at all by dismounted cyclists carrying their bicycles. Anyone attempting to walk this route is putting themselves at risk of a serious harm.</p> <p>Replacement of the steps with a suitable flight of concrete steps is considered critical to making the public footpath suitable as a recommended diversion route. Suitable steps with a handrail would considerably reduce the likelihood of an incident. The severity of a fall on suitable steps would also reduce, presuming the tread length is extended suitably.</p>	Network Rail to monitor usage of the upgraded steps. This location is off the public highway and not the responsibility of the highway authority.
5.5.3	Condition of surface of Public Footpath on Alternative Route.	Public Footpath Users (non-motorised)	Slip, trip, fall hazard	5	2	10	5	2	10	The quality of the public footpath surface be improved including regrading of the path between the railway underbridge and the stone steps, with a crushed gravel with fines, to introduce an enhanced walking surface, allowing for drainage in wet weather.	1	1	1	<p>The current condition of the public footpath is considered almost impassable by pedestrians, and not at all by dismounted cyclists carrying their bicycles. Anyone attempting to walk this route is putting themselves at risk of a serious harm.</p> <p>Resurfacing of the route with suitable materials is considered critical to making the public footpath suitable as a recommended diversion route. A suitable, pedestrian friendly surface would almost eliminate the possibility of an incident, and reduce the severity to negligible levels.</p>	Network Rail to monitor usage of the upgraded footway. This location is off the public highway and not the responsibility of the highway authority.





NETWORK RAIL

**CLOSURE OF LEVEL CROSSING
OFF MOORGATE STREET / DARK LANE
UPPERMILL, OLDHAM**

HIGHWAYS STATEMENT

JUNE 2025

REV A – 3RD JULY 2025



the journey is the reward

Report title:	Closure of Level Crossing, Off Moorgate Street / Dark Lane, Uppermill, Oldham Highways Statement
Date:	Rev A – 3rd July 2025
Project:	NRMOORGATE.2
Prepared by:	Steven Overton - Mayer Brown Ltd
Approved by:	Sean Wotherspoon - Mayer Brown Ltd
On behalf of:	Network Rail
Status:	FINAL

Network Rail
Closure of Level Crossing
Off Moorgate Street / Dark Lane, Uppermill, Oldham
Highways Statement

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APPENDIX D: Census Data

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1 Introduction

- 1.1 Mayer Brown Ltd have been appointed by Network Rail to consider Highways matters related to the proposed extinguishment of a Rail Level Crossing (MVL3 13m 26c Moorgate Halt) and Public Footpath No. 209SADD at Uppermill, Oldham (for location, refer to Appendix A to this report).
- 1.2 The Public Footpath proposed to be extinguished is circa 200m in length and is shown in Appendix B to this report.
- 1.3 The proposed alternative pedestrian route is circa 600m in length and is shown in Appendix C to this report.
- 1.4 This report is not a Road Safety Audit, nor a safety Risk Assessment, but will consider the implications of the proposed extinguishment for all users of the public highway and public footpaths in terms of practicality, usability and safety.
- 1.5 The decision to extinguish the Rail Crossing is one made by Network Rail and their justification for this is provided elsewhere. Mayer Brown accept Network Rails expert opinion and will consider only the implications for the public of the Crossing and the Footpath being closed and becoming unavailable as a route.
- 1.6 This report will consider transfer of risk from Network Rail to the Highway Authority, with the findings based on professional opinion.
- 1.7 This report will recommend potential mitigation for the proposed transfer of pedestrians from the Public Footpath proposed to be extinguished, to the Adopted Public Highway.
- 1.8 A site visit was made on the morning of Friday 25th April 2025, between the hours of 10:45 and 12:30. The weather was warm and dry, and the ground was dry throughout the area of interest.
- 1.9 Attending the visit were:
 - Project Team Leader - Steven Overton (FIHE), Principal Consultant at Mayer Brown Ltd and a competent Highway Design Engineer and Road Safety Auditor
 - Project Team Member - James Stockdale (BEng), Principal Consultant at Mayer Brown Ltd and a competent Highway Drainage Engineer

2 Existing Public Footpath Route

- 2.1 Public Footpath 209SADD, proposed to be extinguished (refer to Appendix B), runs from the corner of Moorgate Street / Den Lane at its Eastern extent (Point A on the plan), generally Southwest-bound, across the Level Crossing, and along Dark Lane until the junction with Ladcastle Road at its Western extent (Point B on the plan).



Photo 2.1a – Eastern extent of Public Footpath to be extinguished (Moorgate Street / Den Lane)



Photo 2.1b – Western extent of Public Footpath to be extinguished (Ladcastle Road)

- 2.2 At the Eastern extent of the Public Footpath route (Point A), Moorgate Street links to Uppermill High Street, which is the main arterial road through the town centre and is the main “destination” for pedestrians in the local area.
- 2.3 The Western extent of the Public Footpath to be extinguished terminates at the junction of Dark Lane and Ladcastle Road. At this point there is a continuation of a Public Footpath route on the West side of Ladcastle Road.



Photo 2.3 – Continuation of Public Footpath (West side of Ladcastle Road)

- 2.4 The nature of the route of the Public Footpath becomes more rural the further West you travel, with limited destinations aside from a golf course, several isolated residential properties and links to further rural-type Footpaths.
- 2.5 The existing route has a variety of surfacing types and textures, and there are very steep gradients required to be navigated. Between the start and end of the route, there is an approximate 37m change in level, with 29m of this height difference coming between the Level Crossing and the junction with Ladcastle Road, resulting in a gradient of more than 1:5.
- 2.6 The majority of the surfacing is un-made ground in the form of compacted earth, with multiple obstacles such as random cobbles, rocks, fallen leaves, tree roots etc.
- 2.7 A fallen tree hinders the route at approximately the half-way point.



Photo 2.7a – Initial length of existing route (between Moorgate Street and Level Crossing)



Photo 2.7b – Level Crossing (looking West)



Photo 2.7c – Immediately West of Level Crossing (looking West)



Photo 2.7d – West of Level Crossing (looking West)



Photo 2.7e – Fallen Tree (looking East, back towards Level Crossing)



Photo 2.7f –Towards Westernmost end of route (looking West)



Photo 2.7g –Westernmost end of route (looking West at junction with Ladcastle Road)

3 Effects of the extinguishment of Level Crossing & Public Footpath

- 3.1 The closure of the Level Crossing and Public Footpath 209SADD will remove a reasonably direct route, circa 200m in length, between Uppermill Town Centre and Ladcastle Road.
- 3.2 Presuming the same “route start and end points”, the proposed alternative route (refer to Appendix C), would require a user to navigate an additional 400m (approximately) using a combination of Public Footways (adopted highway), Canal Towpaths and Public Footpaths (formal, but non-adopted routes).

4 Consideration of likely Pedestrian Movements

- 4.1 A Census was undertaken between 8th November 2024 and 3rd December 2024 (26 days) to count the number of people utilising the Level Crossing. Results of the Census are included in Appendix D and are summarised below.
- 4.2 In total, 647 people were observed to use the Level Crossing.
- 4.3 The vast majority (557) of those observed, were adult pedestrians.
- 4.4 62 children were recorded, of which 18 were accompanied and 44 were unaccompanied.
- 4.5 28 cyclists were recorded.
- 4.6 147 dogs were recorded, of which 139 were on a lead and 8 were not on a lead.
- 4.7 Although these numbers could be averaged to 25 people per day, the results did show that numbers were not evenly spread throughout the week and that recorded numbers were higher on weekends.
- 4.8 During our site visit, the only movement observed on any of the Public Footpath lengths was one cyclist.
- 4.9 Given the nature of the existing route (setting, gradients, surface texture etc) we consider that the route is primarily used by local Dog Walkers, Ramblers and the occasional skilled “mountain-bike-type” cyclist.
- 4.10 There is a note at the bottom of the Census data that advises of 9 instances of “misuse” during the Census period. The authors of this report do not know for sure what this refers to, but assume that the note relates to safety matters which may strengthen Network Rail’s case for closing the Level Crossing.

5 Proposed Alternative Pedestrian Route

- 5.1 The proposed alternative route commences at Moorgate Street, heading East for approximately 40m before users turn onto the towpath adjacent the Huddersfield / Rochdale Canal. The North/Southbound towpath is accessible via either steps or an easily accessible ramped section.



Photo 5.1 – View of access to / from Towpath to / from Moorgate Street (looking North)

- 5.2 The towpath is smooth, level and easily navigable by all pedestrian users, including those with mobility impairments and cyclists. The towpath section of the proposed alternative route is circa 200m in length, until it's junction with the A670 – Main Street.



Photo 5.2a – View of Towpath (looking South to junction with A670)



Photo 5.2b – View of junction with Towpath and A670 (looking North)

- 5.3 Users then navigate approximately 60m along a wide adopted footway adjacent the A670 (west side).



Photo 5.3 – View of footway alongside A670 (looking South)

- 5.4 As the proposed alternative route reaches its junction with the next section of Public Footpath, the footway narrows significantly. Although this section could be navigated without issue by pedestrians walking in single-file, it could be considered relatively unsafe for unaccompanied small children and would not be passable by a cyclist or a mobility impaired user.



Photo 5.4 – View of footway pinch-point (looking North)



Photo 5.5 – View of footway pinch-point (looking South)

- 5.5 The proposed alternative route then heads into what first appears to be a private residence but is clearly signposted as a Public Footpath. This section of the route is initially surfaced with bituminous materials, before reaching two small steps and heading onto an un-made pathway as users start an uphill climb.



Photo 5.5a – Public Footpath sign (looking South)



Photo 5.5b – Start of Public Footpath (looking West)

- 5.6 The proposed alternative route follows the un-made pathway to a crossing of the railway lines by way of a stone tunnel. The tunnel is adequately wide and the surface beneath the tunnel is of bituminous construction and in fair condition. This section of the route is easily navigable.



Photo 5.6a – Approach to tunnel under railway lines (looking West)

Photo 5.6a – Beneath the railway lines (looking East)

- 5.7 West of the tunnel, the bituminous surfacing terminates and the remainder of the route between this point and Ladcastle Road is unmade ground and is very hard to navigate, even for an able-bodied person with specialist hiking footwear. A drainage gully is noted at the bottom of the un-made ground, before the bituminous material begins. Although this gully should catch a relatively fair amount of surface water coming down the hill, it is considered unlikely that it would deal with any significant rainfall event and we would expect the tunnel and ground downstream of the tunnel to suffer from over-ground flow of water should the gully be “overwhelmed” or bypassed.



Photo 5.7a&b – Gulley at extent of un-made ground (looking West ,then East)

Note: Natural detritus (leaves etc) in abundance, which will reduce the effectiveness of this drainage feature unless regularly maintained.

- 5.8 The majority of the remainder of the Public Footpath section of the proposed alternative route is steep, un-made ground, with frequent hazards (leaves, rocks, tree roots etc). The path varies in width, becoming increasingly difficult to navigate the further West (uphill) you navigate.



Photo 5.8a&b – Various sections of Public Footpath (looking West, uphill)



Photo 5.8c&d – Various sections of Public Footpath (looking West, uphill)



Photo 5.8e – Section of Public Footpath (looking West, uphill)



Photo 5.8f – Section of Public Footpath (looking West, uphill)



Photo 5.8g – Section of Public Footpath (looking West, uphill)

- 5.9 Approaching the Western extent of the Public Footpath, users must navigate an extremely steep, rocky incline (estimate 1:2 or steeper), before a set of stone steps that are very steep and are in a state of disrepair. This part of the route was extremely difficult to pass for an able-bodied person with appropriate footwear.



Photo 5.9a – Start of Public Footpath (looking East, downhill, from Ladcastle Road)



Photo 5.9b – Rough stone steps (looking West, uphill, towards Ladcastle Road)



Photo 5.9c&d – Rough stone steps (looking West, uphill, towards Ladcastle Road)

- 5.10 In summary of the section of proposed alternative route that follows the Public Footpath, similar to the existing route, there are substantial changes in height. The section of proposed alternative route between the railway lines (bridge / tunnel) and Ladcastle Road has a level change of circa 37m, over a distance of little more than a 100m, this results in an average gradient in excess of 1:3.
- 5.11 At the top of the stone steps, users must navigate along Ladcastle Road for a distance of around 110m, to reach the end of the proposed route (Point B on existing and proposed plans in the appendices).
- 5.12 Ladcastle Road is an adopted rural road with bituminous carriageway surfacing which is in good condition. The road varies in width and in places it

is not possible for two vehicles to pass one another without slowing their speed significantly or by using passing places.

- 5.13 There are no footways on Ladcastle Road, however, forward visibility is good and during the site visit vehicle speeds were observed to be relatively low, with no feeling of discomfort when sharing the surface with vehicles.



Photo 5.13a – Access from Ladcastle Road to Public Footpath (at flag-type sign on right)

Note – Ladcastle Road (Northbound) is to the left, with access to a private residence in the centre.



Photo 5.13b – Ladcastle Road



Photo 5.13c – Ladcastle Road



Photo 5.13d – Ladcastle Road

6 Summary and Recommendations

- 6.1 As a result of the proposed closure of the existing Level Crossing and Public Footpath, users wishing to get between points A and B (Eastern and Western ends of the existing route) will be required to divert onto the proposed alternative route.
- 6.2 The proposed alternative route is approximately 400m longer than the existing route proposed to be closed.
- 6.3 The majority of the existing route is relatively steep, unlit, and the ground is uneven and littered with obstacles.
- 6.4 The proposed route varies in its quality, due to the different types of surfaces to be navigated. The majority of the length of the route is smooth and accessible (Moorgate Road, Canal Towpath, A670, Ladcastle Road) but the Public Footpath section is steeper than the existing route, also unlit, has even more obstacles, not least the stone steps at the Ladcastle Road end.
- 6.5 Based on the Census information and on-site observations, it is considered that users of the existing route mostly consist of able-bodied, physically fit pedestrians of all ages. Many of these would be local people, walking their dogs or exercising. Many others would be Ramblers, following recognised walking routes and with appropriate footwear for the conditions. It is accepted by these users that they are using a Public Footpath which typically does not have the same level of surface “finish” than an adopted Footway.
- 6.6 Any cyclists using the existing route do so at their own discretion and it is considered that they would have a certain level of fitness (uphill) and skill (downhill) to navigate the surface and obstacles that are currently observed.
- 6.7 It is not considered that mobility impaired people would be using the existing route, and nor would they expect to, given the gradients and nature of the surfacing on the route. Neither would we expect pushchairs / buggy's to be navigating the existing route.
- 6.8 Our recommendations, below, are made on the basis that any users of the existing route should be able to transfer onto the proposed alternative route, and with the exception of having to travel a greater distance, would not be excessively adversely affected by the closure of the Level Crossing and Public Footpath.

6.9 Recommendation 1 – Closure of Level Crossing and Public Footpath

Ensure that adequate provision is made to deter pedestrians from attempting to cross at the location of the former Level Crossing. I.e. Suitable barrier measures are installed at either end of the Public Footpath to deter users from following the route to the Railway Tracks and attempting to find a way across, following the previously available direct route.

A combination of suitable walls, fencing, signage, destruction of the existing walkways should be implemented as necessary to properly remove the route and prevent it from being navigated.

6.10 Recommendation 2 – Footway Pinch-Point on A670



The footway narrowing alongside the A670, adjacent the entry to the Public Footpath used by the alternative route, is a potential hazard for users, particularly unaccompanied children, due to the potential for pedestrians to come close to moving vehicles on a relatively major road.

Ideally, the footway in this area should be widened to a minimum of 1200mm.

Due to a combination of the existing road width, horizontal alignment and location of drainage gulleys, the A670 does not lend itself easily to provision of a wider footway. Any potential improvement may need agreement from the adjacent, third-party landowner, to facilitate widening to the rear of the footway by way of rebuilding their boundary wall further back into their property.

It is accepted that the wall appears to be constructed of natural stone, which may be costly to replace or re-use, and that the land to the private residence

is higher than the highway land and will increase the retention required should the wall move back.

It is also accepted that there would be a requirement for a change to the limits of adopted highway should the footway be widened.

Finally, therefore, it is accepted that third-party land cannot and should not be relied upon to be available and this recommendation is an “ideal” improvement that may not be deliverable in terms of negotiation and / or cost.

6.11 Recommendation 3 – Surface of Public Footpath on Alternative Route

The majority of the Public Footpath to the West of the Railway Bridge / Tunnel presents at steep gradients and is of a poor-quality surface.

Hazards are evident with almost every step, in the form of tree roots, rocks, un-even ground.

It would be our recommendation that a re-grading of the surfacing between the Railway Tunnel and the Stone Steps (Western end of route) be carried out, to remove above-ground obstructions and present as smooth a surface as possible for users of the route.

An ideal scenario would have a bituminous surface, or similar machined finish, cross-falling to one side with a drainage facility along the edge, be that a soakaway trench, or a drainage channel leading to the existing gully at the bottom of the run, West of the Railway Tunnel.

A more reasonable request may be to provide a relatively constant grade of surface, with rocks and substantial above-ground obstacles removed, and a loose gravel surface treatment applied to prevent the surface becoming boggy in wetter weather, however, due to the steep gradients evident here, and the amount of surface water that may run down the Footpath, it cannot be guaranteed how long such a loose surface would remain in serviceable condition. Consideration also should be given to the amount of detritus (leaves etc) that is evident in this location and that this natural waste will continue to fall, regardless of the chosen surface finish.

6.12 Recommendation 4 – Stone Steps between Public Footpath and Ladcastle Road.

The existing stone steps on the proposed alternative route are very steep, have short “treads” and are in a state of disrepair. Several of the stones are broken and there are some treads that move when a foot is placed on them.

This whole section of steps would benefit from reconfiguration, with a longer flight of steps installed, with smaller “risers” and wider “treads”, making the entire route more accessible and safer to navigate.

The wider the treads and lower the risers, the more accessible this route would be for cyclists wishing to divert from the route to be closed.

This recommendation is very important should the proposed alternative route be brought into service.

6.13 Recommendation 5 – Location of change in Speed Limit on A670

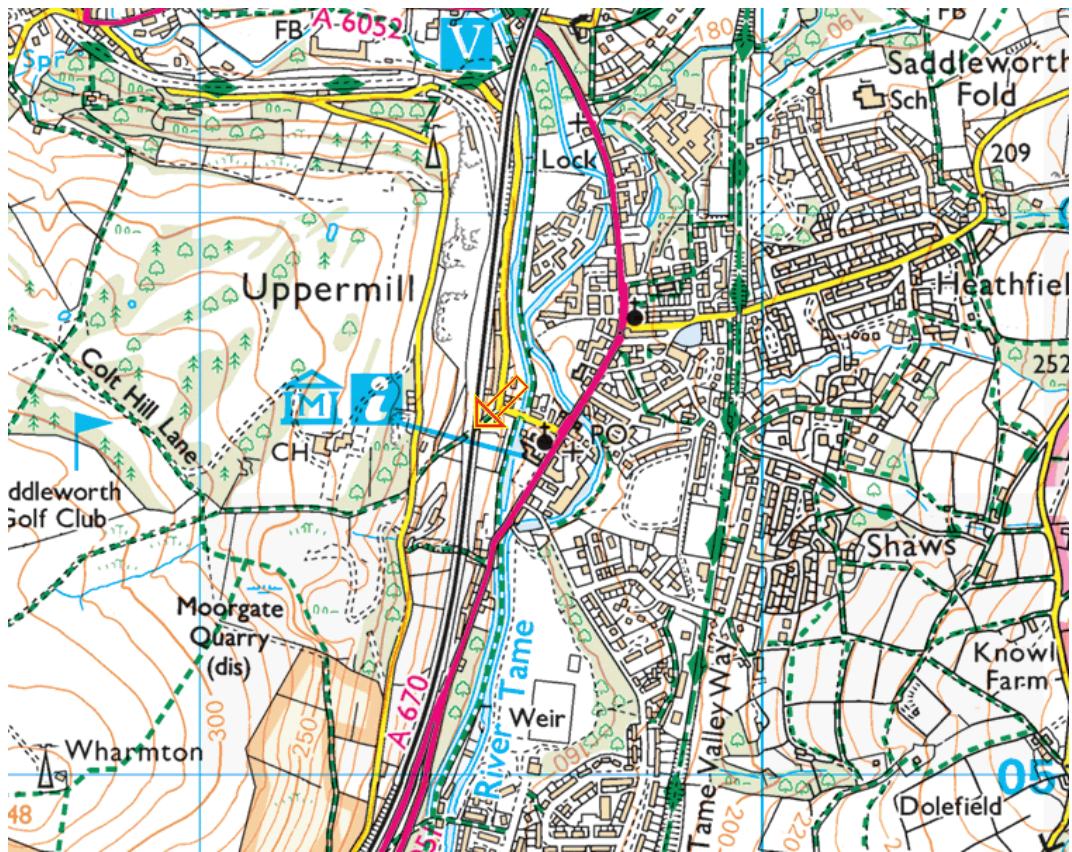
Refer to Appendix E. There exists a change in speed limit between 20mph and 30mph on the A670, to the east of the entry to the Public Footpath used by the alternative route.

If this speed limit change could be moved somewhere to the west of the entry to the Public Footpath used by the alternative route, the 20mph zone would encompass the entirety of the diversion route and may provide a safety benefit.

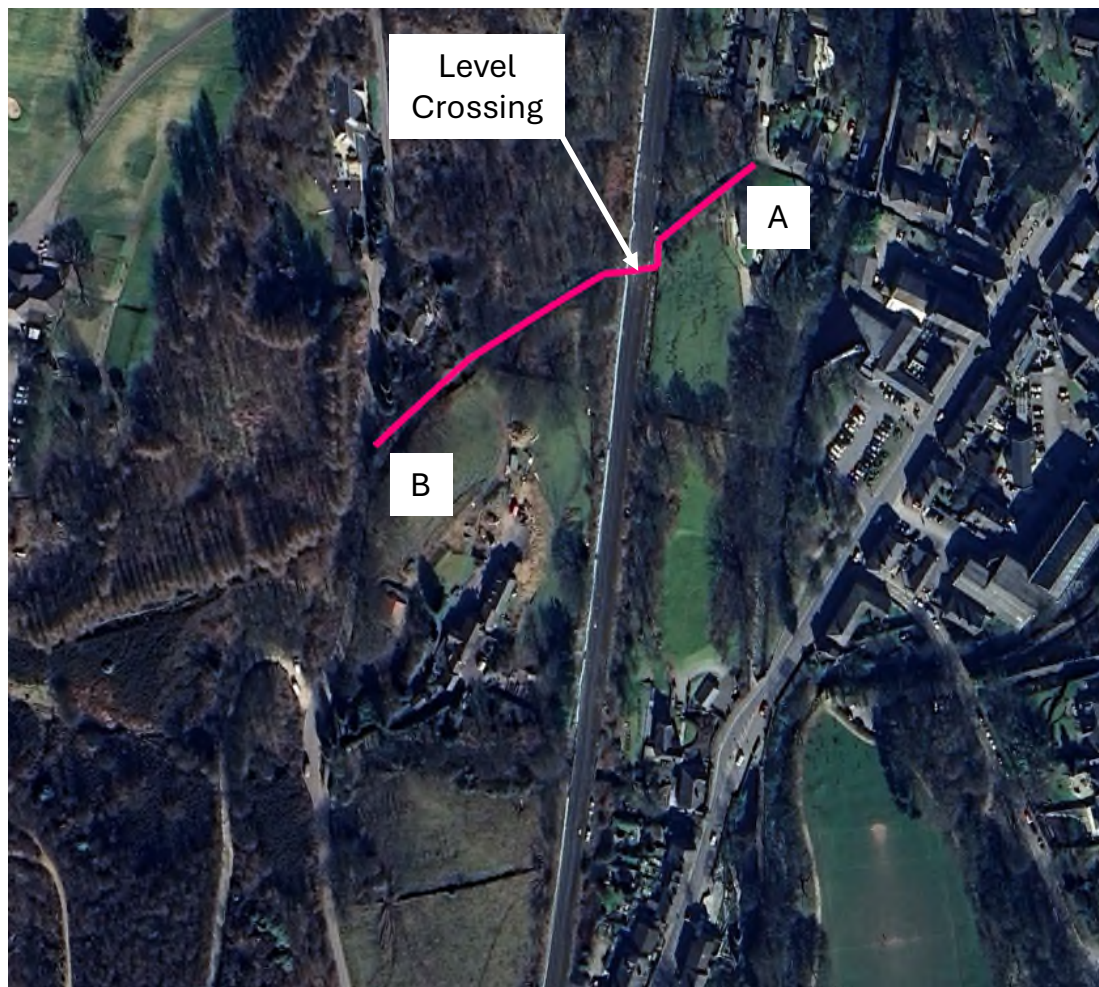
7 Summary

- 7.1 Whether or not the existing Level Crossing is safe is not a matter for Mayer Brown as Highway Consultants to decide. Network Rail have carried out their own assessment and determined that they wish to permanently close the crossing, and subsequently, the associated Public Footpath. Mayer Brown assume then, that the risk to pedestrians using the crossing is considered to be unacceptable to Network Rail and that they have significant concerns that there is the potential for a risk to life.
- 7.2 There is an alternative route available, which is longer than the existing route by around 400m, but which is, for the most part, accessible.
- 7.3 There are recommendations for improvements outlined in Section 6 of this report, and listed below in order of importance valued in terms of safety:
1. Security of the Closed Route (Recommendation 1)
 2. Replacement of Stone Steps on Public Footpath (Recommendation 4)
 3. Regrading of Public Footpath (Recommendation 3)
 4. Amendment of Speed Limit Change Location (Recommendation 5)
 5. Widening of Footway Adjacent A670 (Recommendation 2)
- 7.4 Providing that some form of the three most important recommendations, above, are implemented, the existing route will be suitably closed off and the proposed route will be accessible by all users that currently use the existing route.
- 7.5 The fourth recommendation may provide a safety benefit, particularly if recommendation 5 cannot be implemented.
- 7.6 The fifth recommendation, above, would be a nice-to-have, but it is accepted that delivery of the alteration could prove problematic, dependant on the willingness of third parties to be involved.

APPENDIX A: Location Plan

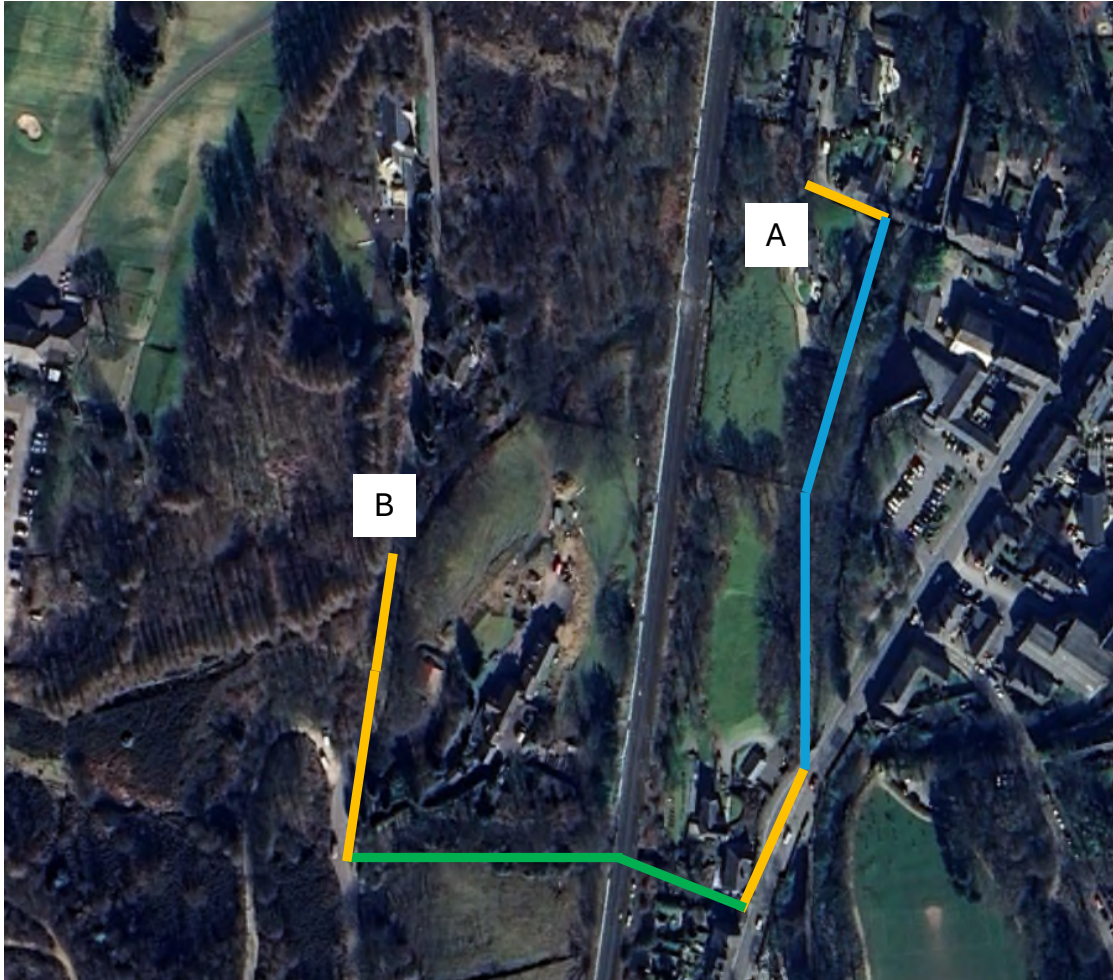


APPENDIX B: Existing Public Footpath to be Extinguished



Route of Existing Public Footpath To Be Extinguished
(209SADD)

APPENDIX C: Proposed Alternative Pedestrian Route

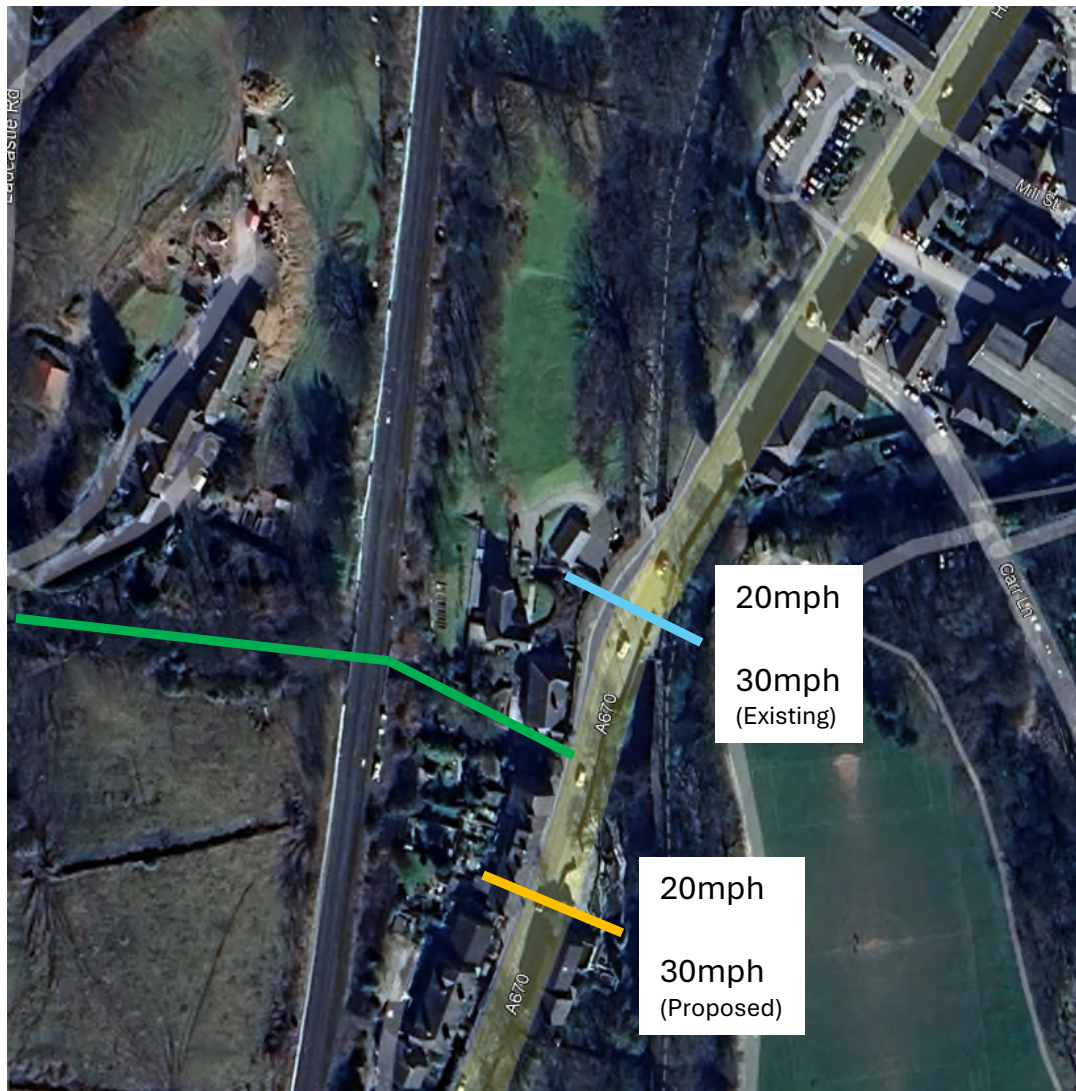


Proposed Alternative Pedestrian Route

-  Public Highway (Footway)
-  Canal Towpath
-  Public Footpath (244SADD)

APPENDIX D: Census Data

APPENDIX E: Speed Limits



Details of Speed Limit Changes

- Location of Existing Speed Limit Change
- Approximate Location of Proposed Speed Limit Change
- Public Footpath (244SADD)

