

**TRANSPORT AND WORKS ACT 1992**  
**TRANSPORT AND WORKS (INQUIRIES PROCEDURES)**  
**RULES 2004**  
**NETWORK RAIL (STALYBRIDGE TO DIGGLE**  
**(SADDLEWORTH) ENHANCEMENTS) ORDER**

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**CONSTRUCTION**  
**SUMMARY PROOF OF EVIDENCE**  
**KEITH GARDNER**

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## **1. INTRODUCTION**

1.1.1 My name is Keith Gardner, I have a BSc (hons) in civil engineering and now a semi-retired Chartered Civil Engineer with over 40 years of experience in the Civil Engineering Contracting industry. My evidence is provided on behalf of Network Rail and relates to the construction methodology of certain aspects of the scheme

### **1.2 Role on the project**

1.2.1 My role on the project is to act as an expert witness in relation to the civil engineering construction activities for the proposed W2B/C scheme on behalf of Network Rail.

### **1.3 Structure of Proof of Evidence**

1.3.1 In this summary, I will outline the rationale for the design and construction approach for the following areas of concern: -

- Mossley Station Location, Construction and the requirements for Brookfields area of land
- Moorgate Halt - Removal of Level Crossing and alternative route
- Oldham Road Bridge and Pedestrian Footbridge - Reasoning behind design and construction approach, including services diversion and road closure
- Station Road MVL3/39 and requirements to close Harrop Court Road
- Ward Lane MVL3/36 - Closure and diversion requirements
- Royal George Bridge MVL3/25 - Interface with Church Hall and requirements for compound
- Compound Strategy - To support efficient construction delivery
- Staging of the works - indication of staging strategy

### **1.4 Scope of Evidence**

1.4.1 In each section of the proof, I have provided a fairly detailed description of the proposed methodology. I explain that the design is still at an early stage; therefore, I would expect further efficiencies to be achieved during the construction phase.

1.4.2 I believe it is important to include such a detailed description of the approach to support the decisions made and to comment on or clarify the comments received in response to the objections.

1.4.3 I have also included a strategy for the proposed compounds and an approximate period of use for each.

1.4.4 There is a high-level staging strategy included in the proof, which is currently being developed in line with a rail access plan.

## **1.5 Mossley Station**

1.5.1 The new location and the reasoning behind it are covered in Emma Clarke's evidence.

1.5.2 In this section, there is a detailed approach to the new construction and the abandonment of the existing station, access requirements, site setup, outline construction methodology summary, transport considerations, temporary works, and site constraints.

1.5.3 This section explains the measures needed to be taken at Manchester Road, and the access requirements and programme time for the use of the Brookfields area. It is envisaged that the works will be undertaken Monday to Friday, with weekend night rail possessions required to remove material.

1.5.4 I believe the construction and design have duly considered the effects of the new station on the local community in their approach. It is important to highlight that the compound at Plevins Logistics Hub would play a key part in the logistics and in eliminating excess traffic, especially at peak times.

1.5.5 Due to the location and access, the construction in the Brookfields area itself is very sequential and, as such, will not be highly labour- or plant-intensive.

## **1.6 Moorgate Halt Level Crossing**

1.6.1 Moorgate Halt level crossing conveys a public footpath and is currently closed.

1.6.2 In construction terms, I have indicated in my proof the reasoning behind the complexity in access and subsequently the increased cost of replacing the closed level crossing with a footbridge, which has been proposed by the Objectors.

1.6.3 I believe that once the footpath along the alternative route is brought up to an acceptable standard, it would be a much safer and more suitable option.

1.6.4 Lee Baraclough has included the design of the alternative route in his Proof.

1.6.5 My proof sets out the construction and access constraints associated with such a footbridge due to its location, both on track and off-road, along with the local

geography. In summary, access for any footbridge would have to be by Rail and via the Greenfield Station access point.

## **1.7 Oldham Road and Pedestrian footbridge**

- 1.7.1 This section describes the existing structure, the concerns of the objectors, an overview of the constraints, a strategy for utility services diversion and sets out the construction activities in relation to the works to replace the existing Rail Bridge and install a new footbridge.
- 1.7.2 I have set out the sequence of construction activities in my Proof and explained that the proposed design and construction process means there is no reliance on reinstatement of utility services, which reduces the risk of a longer road closure immensely.
- 1.7.3 The closure of the Oldham Road Bridge, the main objection, is de-risked by the approach of diverting services across the new footbridge. This means that post-demolition, the construction of a new structure is not dependent on third parties affecting the delivery.

## **1.8 Station Road MVL3/39**

- 1.8.1 In my proof, I explain the approach to constructing the new bridge, access strategy and construction sequence.
- 1.8.2 The new structure has considerable variation in vertical alignment, which means that the junction of Harrop Court Road and Station Road will need to be remodelled and, as such, closed for the duration of the bridge construction.
- 1.8.3 There is a proposed diversion route for traffic and pedestrians via Boat Lane and across the tunnel portal.
- 1.8.4 The Sam Road compound, located on the opposite side of the railway to Diggle Office and Welfare Compound, is required for both crane access and welfare.
- 1.8.5 There are still two methods for cranage, which I have described in the proof, with a preferred option which requires access across the rail through Sam Road car park.
- 1.8.6 I explain that utilising access through the Sam Road car park represents the least disruptive approach and avoids interface with the public.

## **1.9 Ward Lane MVL3/36**

- 1.9.1 My proof describes the construction approach and the proposed diversion of pedestrians utilising a temporary services bridge running parallel to the existing structure.
- 1.9.2 A diversion will be in place for the duration of the build and the reinstatement of the services.

## **1.10 Royal George Bridge MVL3/25**

- 1.10.1 There are two options for the construction considered, with a preferred option highlighted in my proof. Both schemes will affect access to the church hall. I have highlighted a preferred option which would reduce the time when access needs to be closed to the public.
- 1.10.2 The closure to the church hall is not excessive as the build will primarily be undertaken at track level; however, there is a period when heavy crantage is required, and so the need for a closure is not only for the safety of operations but also primarily for the safety of the public.
- 1.10.3 These works will utilise the Oaklands Road Compound.

## **1.11 Compound Strategy**

- 1.11.1 The Order Scheme is spread over a large geographical area, it is therefore important to have strategically located compounds to not only manage the works but also eliminate excess vehicle movements on surrounding road networks.
- 1.11.2 There are four strategic compounds, supported by a number of satellite compounds, which are limited in time to the build period. These periods are highlighted in the proof.
- 1.11.3 The strategic compounds are located close to operations but are required to house both plant and materials, as well as management staff and labour. Most important would be Plevin's Logistics Hub which will not only be the hub for management but also a key area for transport and materials to Mossley station.
- 1.11.4 Where possible, satellite yards are located adjacent to the rail infrastructure and this is described within my proof.

## **1.12 Staging of the works**

- 1.12.1 The staging of the works, including periods, proposed road and pedestrian footpath closures, is indicated graphically in the Proof of Evidence.
- 1.12.2 The staging of the works has been considered not only for the efficiency in delivery but also taking due cognisance of the effects of the construction on both the local community and local businesses.
- 1.12.3 My proof shows how the construction staging and associated road closures have been considered and limited where possible.
- 1.12.4 The proposed road and footpath closures have been considered in detail as to whether there are any alternatives, and in some cases, this has been adopted; there are some areas where this cannot be done, resulting in the planned programme as shown.

## **1.13 Witness Declaration**

### Statement of declaration

- 1.13.1 My proof of evidence includes my declaration as an expert witness, which also applies to my summary of my evidence.