

Our Reference: **SHARE/ 80693510**
Your Reference: West Midlands Interchange

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Via Email:

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Dear Sirs

WEST MIDLANDS INTERCHANGE DCO – REQUEST FOR COMMENTS FROM SECRETARY OF STATE

We note the request for comments from the Secretary of State regarding the application by Four Ashes Limited for the West Midlands Interchange Development Consent Order within a letter dated 24th January 2020. Highways England's response is set out below.

A449 Drainage Culvert

With regards to the use of an existing culvert under the A449, in our Deadline 8 submission Highways England set out the following:

“We remain fundamentally opposed with the Applicant’s position with regards the use of the culvert underneath the A449 as stated in their Deadline 6 submissions. We reiterate our Deadline 7 submission that any attempt to use this culvert without Highways England’s consent will be strongly resisted and, if necessary, appropriate legal action will be taken to prevent any unlawful use. The provision of alternative drainage infrastructure is not recorded in the latest DCO and therefore this matter in our view remains an impediment to the scheme being delivered.”

It is noted that comments are being sought from Highways England on an amendment to Works Nos 6(u) and 7(r) in Schedule 1 to any Development Consent Order that might be granted by the Secretary of State, specifically the addition of the words in italics as set out below:

“the construction of culverts under the A449 adjacent to Zone A1 and, if necessary, adjacent to Zone A2 as an alternative to use of the existing culvert situated adjacent to Zone A2, under Vicarage Road between Zone A5b and A7c and under Straight Mile south of Zone A7c to connect services either side of the public highway”

Highways England confirms that the above amendment to Works Nos 6(u) and 7(r) in Schedule 1 to any Development Consent Order that might be granted by the Secretary of State is agreeable and allays our previous concerns. However, this view is predicated on the applicant confirming that the conclusions of the Environmental Statement will not be affected. In the event that the conclusions of the Environmental Statement are affected, then Highways England respectfully asks for the opportunity to comment further.

Stage 1 Road Safety Audit

M6 J12 Circulatory Carriageway

The issue of further collision investigation was raised in Problem B of the initial RSA (Road Safety Audit). The RSA Audit Team, concerned by the potential impact of the additional traffic on the A5, recommended a collision investigation was conducted and, where necessary, measures introduced to address safety concerns on the affected A5 links, including the A5/A449 Gailey roundabout.

During discussion regarding the Design Organisation's Response to the Problem, Highways England requested the study include M6 J12 in addition to the A5 links and A5/A449 Gailey roundabout.

On behalf of the applicant, WSP prepared a technical note (no. 40) to investigate collisions accordingly. Analysis of M6 J12 collision data suggested there was a cluster of collisions on the M6 J12 Southbound Off Slip. A common factor of causation was found to be 'failure to look properly'. As the proposed development will lead to a material increase in flows on this arm of the junction, WSP were asked to investigate further to establish what could be causing the issue.

WSP Technical Note no 40 asserted that vegetation (affecting visibility) on the slip road and worn-out high friction surfacing may be an issue and should be addressed by Highways England. However, this didn't appear likely as the collision's severity was 'slight' and all collisions appeared to be focused at the top of the slip road near the give way line.

Further investigation was therefore required to explain how these factors may be related to the type of collisions and seek other possible reasons. This investigation naturally involved a review of junction geometry and it was suggested by Highways England that circulatory traffic speeds could be a factor causing hesitation on the slip road and leading to rear-end shunts.

The latest information submitted by WSP includes a review of DMRB (Design Manual for Roads and Bridges) standards for grade separated roundabout junctions. WSP have linked the geometry of the circulatory (nominally 85 metre radius) in proximity to Southbound Off Slip to a Design Speed of 50kph (approximately 30mph) and concluded that high speed is not a factor.

However, the speed limit on the circulatory is 50mph (not 50kph) and in the absence of actual speed measurements, Highways England is unable to accept the applicant's conclusion.

Critically, the applicant's analysis hasn't established the root cause of the collisions or whether it is feasible to provide mitigation. Accordingly, this matter remains unresolved.

A449/A5 Link Road Crossing

The issue with the A449/A5 link road crossing was initially raised as Problem J in the first RSA (Road Safety Audit) Stage 1 report and related to the type of crossing (informal) which was not appropriate. The RSA Audit Team Recommendation suggested the use of a signalised crossing.

Discussion ensued regarding a solution involving a signalised (Toucan) crossing. As this was a material change to the design, a re-audit was required. This RSA was completed in June 2019 and concluded that the proposed crossing was too far away from the NMU (non-motorised users) desire line to be of benefit. Concern was raised that NMUs would in fact cross closer to the junction where there are no crossing facilities.

Further design discussions led to a revised Toucan crossing being proposed, located closer (approximately 20 metres) to the junction on the A449. The subsequent RSA (August 2019) concluded this had resolved the NMU 'desire line' problem, however raised concerns with visibility on the approach to the crossing from the junction and the potential for blocking back onto the A449 trunk road.

The latest submission is shown on WSP drawing no 70001979-SK-115 rev B dated February 2020 and explained in the revised WSP Technical Note no 46 dated 6 February 2020. This seeks to demonstrate that approach visibility can be achieved and blocking back can be mitigated with the use of 'Keep Clear' markings. In principle, the latest solution appears to address the outstanding RSA issues. Accordingly, we are of the view that there is likely to be a design solution that will resolve our concerns.

We note the wording of the proposed addition to the list of details to be submitted and approved reads as follows:

“the location of the pedestrian crossing on the A5/A449 link road notwithstanding the detail shown in that respect on the Highway plans (in consultation with the local highway authority and Highways England)”

We are supportive of this matter being added to the list of details to be submitted and approved. However, we are concerned at only having the role of a consultee on this matter which has direct implications for the Highways England asset. We request that this addition to the list of details to be submitted and approved be updated to refer to not just 'consultation' with Highways England but also ensuring Highways England provides its 'approval' (as set out below with the additional text coloured blue). This amendment is required for the proposed additional wording to be acceptable to Highways England.

“the location of the pedestrian crossing on the A5/A449 link road notwithstanding the detail shown in that respect on the Highway plans (in consultation with the local highway authority and [with the approval](#) Highways England)”

Late Representation

We note the late representation from the applicant dated 13 December 2019. We do not have any comment to make on this representation.

Yours sincerely,



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