

Wednesbury to Brierley Hill Extension

Evidence Given on Behalf of the Applicant: WMCA
Rebuttal to Evidence of David G van der Lande



Transport and Works Act 1992

The Transport and Works

(Inquiries Procedure) Rules 2004

***West Midlands Combined Authority's (WMCA) EVIDENCE IN
REBUTTAL***

*OBJECTION OBJ/10 Intu Merry Hill - Evidence of David G van
der Lande (OBJ/10/P1.1 and 1.2)*

TRANSPORT AND WORKS ACT 1992

Midland Metro (Wednesbury to Brierley Hill Land Acquisition) Order Inquiry

MARCH 2019

Evidence in Rebuttal of Objection OBJ/10 Intu

1. Proofs of evidence in connection with Objection OBJ/10 have been prepared by David G van der Lande [**OBJ/10/12.1 and 1.2**] and Jonathan Parker [**OBJ/10/P2.1 and 2.2**]. The points raised by David G van der Lande within his proof and supporting documents are addressed below by the WMCA’s witnesses; silence on any matter should not be taken as indicating WMCA’s agreement.
2. The points raised are dealt with by WMCA’s witnesses as follows:

Issues raised in the proof of David G van der Lande (documents OBJ/10/P1.1 and 1.2)	WMCA Witness
Extent of Land required (4.1-4.3)	Ian Collins – Civil Engineering
Consultation (5.1) – Proposed alterations to the road system	Himanshu Budhiraja- Transport and Traffic
Insufficient information (6.1) – impact on the scheme and works to the highway network	Himanshu Budhiraja- Transport and Traffic
Mitigation Measures (8.1-8.6)	Ian Collins – Civil Engineering
Funding (9.1-9.12)	David Carter - Transport and Economic Case Peter Adams – Scheme Development
Scheme Benefits (10.1-10.4)	David Carter - Transport and Economic Case Peter Adams – Scheme Development
Scheme Design (11.1 – 11.3)	Ian Collins – Civil Engineering

Introduction

3. This rebuttal has been prepared by Mr David Carter (Transport and Economic Case witness), Mr Peter Adams (Scheme Development witness), Mr Ian Collins (Civil Engineering witness) and Mr Himanshu Budhiraja (Transport and Traffic witness) in response to the Proof of Evidence of Mr David G van der Lande [**OBJ/10/P1.1**] on behalf

of Intu.

Extent of Land required (4.1-4.3)

The Objector's Evidence

4. In paragraph 4.1 of his proof of evidence [OBJ/10/P1.1], Mr van der Lande states that *"There is no clear justification for the extent of land take being proposed between Central Way and The Embankment, or the purpose to which it will be put. As a consequence, the impact on pedestrian and car borne shoppers cannot be adequately determined."*
5. In paragraph 4.2 of his proof of evidence [OBJ/10/P1.1], Mr van der Lande states that *"The extent of land required permanently could be as little as 1.5 hectares as opposed to the land associated with plots 336, 337, 338, 340, 341, 343, 344, 345 and 346 which in aggregate total 3.3 ha."*
6. In paragraph 4.3 of his proof of evidence [OBJ/10/P1.1], Mr van der Lande states that *"It is therefore requested that should the order be confirmed that the extent of land required is adjusted to reflect the extent of land required."*

The Promoter's Response

Ian Collins

7. The horizontal limits of deviation set out on the Land Plans [WBHE/A7] define the maximum extent within which the tramway will be built and are a function of the extent of the proposed works and existing property boundaries. The horizontal limits of deviation have been prepared so as to allow for development of the detailed design and working space required during construction. This is normal practice for Transport and Works Act Order projects.
8. All of the plots queried by Mr van der Lande are needed given existing steep slopes, limited accesses and complexities of tramway infrastructure construction in the area described. Proposed construction methodologies in this area are discussed further at Section 8.12 my main proof of evidence [APP/P3.1].

The Merry Hill Shopping Centre benefits from multiple vehicular and pedestrian access routes and will continue to function throughout the tramway construction works and thereafter during operation of the tramway. Access to the shopping centre and car parks will be maintained and pedestrians will be safely diverted around the works where

necessary.

Consultation (5.1) – Proposed alterations to the road system

The Objector’s Evidence

9. In paragraph 5.1 of his proof of evidence [OBJ/10/P1.1], Mr van der Lande states that *“Whilst there has been continued dialogue with intu on the proposed Scheme to date, proposed alterations to the road system to mitigate the effect of the proposed Scheme on Merry Hill have yet to be set out in sufficient detail to determine the effect on the road network, preventing a proper assessment of impact or to allow an assessment of any mitigation measures, despite continued requests for sufficient detail by ITP, Transport Consultants acting for intu.”*

The Promoter’s Response

Himanshu Budhiraja

10. There has been continued dialogue with Intu and ITP. As a part of early engagement with Intu, MMA on 22 November 2016 presented a proportionate approach to transport modelling to understand the impacts of WBHE operation on the highway network around Merry Hill, particularly the Level Street/The Embankment junction and the junctions in its vicinity.([APP/4.3] (Appendix B)). Throughout 2017, whilst transport modelling was being progressed there was continued engagement with ITP and Dudley Metropolitan Borough Council (DMBC) and any available working documents were shared with ITP and DMBC for feedback and review. Any decisions on further modelling were taken in engagement with ITP and DMBC. The information related to the proposed alterations to the WBHE as a part of the outline design included making no permanent changes to the layout or functionality of The Embankment and for it to continue to operate as a two-way road with WBHE. This was communicated to ITP through email dated 15th October 2018 as in Appendix B to proof of evidence ([APP/4.3] Page 433) and again confirmed on 11 January 2019 [Appendix APP/R1.2]. Subsequently, a meeting was scheduled for 8 February 2019 with MMA (on behalf of WMCA), ITP and DMBC to present the outcome of the transport modelling work undertaken to assess the impacts of WBHE in the vicinity of Merry Hill. In this meeting, the presentation also covered the proposed alterations to the WBHE {Appendix APP/R.1.2}. At no point did ITP, ask for information and thus not receive a response.

Insufficient information (6.1)

The Objector’s Evidence

11. In the first bullet point of section 6.1 of his proof of evidence [OBJ/10/P1.1 and 1.2], Mr

van der Lande states that *“Insufficient information has been provided to Intu by MMA in respect of Impact of the proposed scheme and works to the highways network.”*

The Promoter’s Response

12. See answer above from Mr Himanshu Budhiraja. This is also covered in his Evidence in Rebuttal [APP/R2.1] as response to issues 3.5,3.7 and 3.8 raised in Evidence of Jonathan Parker [OBJ/10/P2.1 and 2.2].

Mitigation Measures (8.1-8.6)

The Objector’s Evidence

13. In paragraph 8.2 of his proof of evidence [OBJ/10/P1.1], Mr van der Lande states that *“Retail trading is reliant on key trading periods of trading occurring in the pre-Christmas months and during other key holiday periods, such as Easter. These peak trading flows determine the ability of retailers to ensure viable businesses, maintain units, employ staff and pay for their premises. ”*
14. In paragraph 8.4 of his proof of evidence [OBJ/10/P1.1], Mr van der Lande states that *“The consideration of average traffic flows at key, peak trading periods, does not reflect the likely impact of the scheme on Merry Hill occupiers and the stock, staff and rents they are capable of sustaining.”*

The Promoter’s Response

Ian Collins

15. WMCA has agreed with Intu, that any construction works to be carried out that would reduce highway capacity on the private roads or public roads in the vicinity of the Merry Hill Shopping Centre will be undertaken **outside of peak times** comprising:
- annual periods between the last week in October in any year to 7 January in the following year between the hours of 9am to 8pm save that in December the hours are between the hours of 9am and 12:00 midnight;
 - the two weeks immediately prior to and following the statutory Easter Bank Holiday between the hours of 9am to 8pm; and
 - three special weekends per year (such as weekends that include Mother's Day and Father's Day) provided that such weekends shall be agreed between Intu and WMCA.
16. The holiday period work embargoes have been taken into account in MMA’s planning and are detailed in the Level Street Indicative Construction Plan at Section 3

Assumptions and Section 5 High Level Schedule, attached in the appendix to my main proof of evidence [APP/P3.3].

Funding (9.1-9.12)

The Objector's Evidence

17. In paragraph 9.2 of his proof of evidence [OBJ/10/P1.1], Mr van der Lande states that *"intu are concerned that funding may not be sufficiently available"*.
18. In paragraphs 9.4 to 9.6 of his proof of evidence [OBJ/10/P1.1] Mr van der Lande reviews the use of Optimism Bias by WMCA in the Outline Business Case [WBHE/D3-D7], using the term *"DfT compliant budget"*,
19. in paragraph 9.7 of his proof of evidence [OBJ/10/P1.1] Mr van der Lande states that an *"area of costs that appears not to have been allowed for in relation to the acquisition costs are mitigation works and in the context of assume funding shortfall, potentially any compensation for intu Merry Hill."*
20. In paragraph 9.8 of his proof of evidence [OBJ/10/P1.1], Mr van der Lande summarises his point by stating *"without taking into account the costs of mitigation or compensation there is a potential, unquantified funding shortfall in excess of £310.4 million of £92.3 million, with an additional allowance required for the costs of, as yet to be determined, mitigation measures and or compensation in respect of intu's interests."*
21. In paragraph 9.10 of his proof of evidence [OBJ/10/P1.1] Mr van der Lande notes to the Appraisal Summary Table (AST) *"section E-35 of the Economic Case that the broad transport budget is £443.4 million as opposed to £343.6 noted elsewhere"*.
22. In paragraph 9.12 of his proof of evidence [OBJ/10/P1.1] Mr van der Lande states that *"I contend it is not in the public interest for a major infrastructure investment, where there is an identified shortfall in funding of in excess of 9.6% and potentially in excess of 27%, should not progress without determining an effective budget reflecting potential costs and determining that the funding to meet that budget, will be met."*

The Promoter's Response

David Carter

23. In respect of paragraph 9.2 of Mr van der Lande's proof of evidence [OBJ/10/P1.1], Mr Adams deals with funding issues below
24. In respect of paragraph 9.4 to 9.7 in Mr van der Lande's proof of evidence [OBJ/10/P1.1], I explain the concept and use of Optimism Bias in appraisal generally and its application in the WBHE appraisal in particular in paragraph 3.5.7 of my main

proof of evidence [**APP/2.1**]. .

25. In respect of paragraph 9.10 in his proof of evidence [**OBJ/10/P1.1**], Mr van der Lande identifies two very different cost or appraisal metrics in his paragraph 9.10. The two costs identified are not directly comparable and are expressed in different units, although the construction cost components of the Broad Transport Budget are based on the same underlying estimates.
26. The £343.6m figure represents to the construction cost, expressed in cashflow or nominal terms required to build the WBHE. This cost is used to drive the funding requirements for the scheme, and does not include any operating costs or other public sector cost changes.
27. The £443.4m figure represents the cost components that form part of the Broad Transport Budget and is used, with other public sector cost and revenue changes, only in the scheme appraisal.
28. The figure quoted by Mr van der Lande is a sum of the discounted present value of the capital cost stream and operating cost stream, expressed in 2010 market prices over the standard 60-year appraisal period. The Broad Transport Budget is an appraisal term that identifies the sum of the discounted present values of the public sector investment costs, together with any renewals costs, public sector operating cost streams, and public sector revenue streams, and any changes in indirect taxation streams to the Exchequer.
29. Therefore, the construction costs required to deliver the scheme, expressed in cashflow or nominal terms at the time they are incurred, are not directly comparable to the stream of construction costs, renewal costs, operating costs, revenues and indirect taxation changes, expressed as a present value in 2010 market prices over the 60-year appraisal period.
30. As noted in the both Peter Adams' and my Supplementary Proofs of Evidence [APP/1.4 and APP/2.4 respectively] and in the section E4 The Wednesbury to Brierley Hill Final Business Case - Financial Case [**WBHE/D4/B**], the public sector investment costs, including any renewals, and public sector operating cost streams have now been updated. The cashflow construction costs, used to determine the funding requirements have been updated to a figure of £449.5m, with these revised costs underpinning the appraisal costs (expressed in discounted present values in 2010 market prices) as set out in Table 1 of my Supplementary Proofs of Evidence [**APP/2.4**] and including the full

range of components contributing to the Broad Transport Budget

Peter Adams

31. Mr van der Lande incorrectly uses the term “DfT Compliant Budget” in referring to the use of Optimism Bias in scheme appraisal and costing. Under the relevant transport business case guidance and as explained by my colleague Mr David Carter in his Supplementary Proof [APP/2.4] in section 2.2.8, an appropriate level of Optimism Bias is added to the scheme costs in appraisal, and this cost is used to produce the value for money assessment for the WBHE. However, the capital costs used to secure funding exclude Optimism Bias, therefore any such additional costs, should they arise, will fall to the promoter of the WBHE, in this case WMCA. There is therefore no “DfT Compliant Budget” as stated by Mr van der Lande. The term is not appropriate in this context and his assumption in paragraph 9.8 of his proof of evidence [OBJ/10/P1.1] is incorrect.
32. I can confirm that any costs anticipated by WMCA for mitigation works for the WBHE are included in the project capital cost and risk allowances. Allowances for these costs are contained within the detail of the revised project cost estimate and current risk register, which are included as Appendices F-1 and E-7 of the Final Business Case [WBHE/D4C] and [WBHE/D6C] respectively.
33. With regard to the overall funding of the WBHE, in my supplementary Proof of evidence [APP/1.4] I state a revised project outturn capital cost of £449.5 million and note, with reference to the relevant WMCA report attached as an appendix that it is anticipated that this will be fully funded through the sources of funding identified in my main Proof of Evidence [APP/1.1] and through the use of prudential borrowing.

Scheme Benefits (10.1-10.4)

The Objector’s Evidence

34. In paragraph 10.2 of his proof of evidence [OBJ/10/P1.1], Mr van der Lande states with respect to modelled data that *“The base data is generated from assumed traffic flows and information assessed from the application made in 2003 and presented along with other data in the 2005 Inquiry, which determined the benefits that informed the 2010 modelling is not reflective of current movements”*.
35. In paragraph 10.3 of his proof of evidence [OBJ/10/P1.1], Mr van der Lande states *“While there is reference to reduced bus usage as a benefit it is unclear what the effect*

on services will be.”

The Promoter’s Response

David Carter

36. In respect of paragraph 10.2 and 10.4 in his Proof of Evidence [**OBJ/10/P1.1**], Mr van der Lande appears to assert that the base data [for the current appraisal] uses traffic flows and information produced in 2003 and that without current information the assumed benefits cannot be demonstrated or determined.
37. As I explain in my main proof of evidence [**APP/2.1**] at section 3.3.5, the benefits appraisal is based on outputs from the strategic transport model called PRISM (Policy Responsive Integrated Strategy Model) developed as a strategic model for the West Midlands by the seven district authorities, Highways England and West Midlands Combined Authority.
38. The PRISM model has a base year of 2011 and is capable of forecasting the total demand for private and public transport across the study area. Most of the data underpinning the model was collected or sourced between 2010-2012. The current appraisal of the key monetised (including User Benefits) is a new assessment based on the PRISM 2011 base year, in future year forecasting mode, and does not rely on the assessments that were used to support the 2005 Order application. It is not clear what the reference to 2010 modelling refers to.
39. The PRISM Data Summary Report, which appears in Appendix A the Wednesbury to Brierley Hill Business Case - Economic Case [**WBHE/D7/A**], provides full details of the key 28 data sources used in the model. This report was drafted for PRISM 4.5 but is also applicable to PRISM Version 4.6. The PRISM Local Model Validation Report and Forecasting Reports also are provided in Appendix A to the Wednesbury to Brierley Hill Business Case - Economic Case [**WBHE/D7**].
40. In respect of paragraph 10.3 in his Proof of Evidence [**OBJ/10/P1.1**] Mr van der Lande refers to bus services. Bus services in the West Midlands are of course de-regulated and therefore WMCA has no control over how private sector operators will respond to the operation of the WBHE. However, in order to undertake the WBHE appraisal, this has been considered in the Outline Business Case. Paragraph 3.10 of the Economic Case [**WBHE/D7**] on page E-6 sets out the Do Something scenario that incorporates a series of changes to the bus service frequencies and routes in order to represent a possible ‘neutral’ bus operator response to the new Wednesbury to Brierley Hill Metro

Extension (as opposed to any possible overtly 'competitive' or 'complementary' response that bus operators may adopt to the presence of the Metro). Following a review of the bus network in the vicinity of the WBHE (Appendix B [WBHE/D7/A]), a series of indicative route and frequency changes have been made to several bus routes in the vicinity of the WBHE. Table 3.2 sets out the changes made to the public transport model. I concluded that these changes would not have a material impact either on the visitor throughout or operations of the Merry Hill shopping centre.

41. Indeed, over time, with increasing public transport accessibility and shopping centre usage generated by the WBHE, I would expect that the public transport market as a whole would be able to grow, with the potential to support enhanced service delivery throughout the area.

Scheme Design (11.1-11.3)

The Objector's Evidence

42. In paragraph 11.1 of his proof of evidence [OBJ/10/P1.1], Mr van der Lande states that *"The proposed scheme may envisage a tram stop adjoining the Dudley Canal, in a location consistent with that proposed by the 2005 Order."*
43. In paragraph 11.2 of his proof of evidence [OBJ/10/P1.1], Mr van der Lande states that *"Insufficient detail has been provided to demonstrate routes for passengers from the significantly elevated position that any tram stop would occupy in close proximity to Dudley Canal. Links from the 2005 Order do not show any access detail which might help inform discussion."*
44. In paragraph 11.3 of his proof of evidence [OBJ/10/P1.1], Mr van der Lande states that *"Whether pedestrian, disabled or people with young children, the current direct route to Dudley Canal to path is through a series of tiered external stairs or a potentially significantly extended route through a series of ramped pedestrian routes which are not demonstrated as being compliant with disabled access requirements."*

The Promoter's Response

Ian Collins

45. A walkway, lift shaft and stair well will link the Merry Hill tram stop with The Merry Hill Shopping Centre. Please refer to paragraph 11.6.7 of my main proof of evidence [APP/P3.1] and pages 116 and 117 of the approved Street Design Guide [WBHE/F17],

where more details are provided.

Evidence in Rebuttal of Objection OBJ/10 Intu

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Assumptions and Section 5 High Level Schedule, attached in the appendix to my main proof of evidence [APP/P3.3].

Funding (9.1-9.12)

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The Promoter's Response

David Carter

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30. As noted in the both Peter Adams' and my Supplementary Proofs of Evidence [APP/1.4 and APP/2.4 respectively] and in the section E4 The Wednesbury to Brierley Hill Final Business Case - Financial Case [**WBHE/D4/B**], the public sector investment costs, including any renewals, and public sector operating cost streams have now been updated. The cashflow construction costs, used to determine the funding requirements have been updated to a figure of £449.5m, with these revised costs underpinning the appraisal costs (expressed in discounted present values in 2010 market prices) as set out in Table 1 of my Supplementary Proofs of Evidence [**APP/2.4**] and including the full

range of components contributing to the Broad Transport Budget

Peter Adams

31. Mr van der Lande incorrectly uses the term “DfT Compliant Budget” in referring to the use of Optimism Bias in scheme appraisal and costing. Under the relevant transport business case guidance and as explained by my colleague Mr David Carter in his Supplementary Proof [APP/2.4] in section 2.2.8, an appropriate level of Optimism Bias is added to the scheme costs in appraisal, and this cost is used to produce the value for money assessment for the WBHE. However, the capital costs used to secure funding exclude Optimism Bias, therefore any such additional costs, should they arise, will fall to the promoter of the WBHE, in this case WMCA. There is therefore no “DfT Compliant Budget” as stated by Mr van der Lande. The term is not appropriate in this context and his assumption in paragraph 9.8 of his proof of evidence [OBJ/10/P1.1] is incorrect.
32. I can confirm that any costs anticipated by WMCA for mitigation works for the WBHE are included in the project capital cost and risk allowances. Allowances for these costs are contained within the detail of the revised project cost estimate and current risk register, which are included as Appendices F-1 and E-7 of the Final Business Case [WBHE/D4C] and [WBHE/D6C] respectively.
33. With regard to the overall funding of the WBHE, in my supplementary Proof of evidence [APP/1.4] I state a revised project outturn capital cost of £449.5 million and note, with reference to the relevant WMCA report attached as an appendix that it is anticipated that this will be fully funded through the sources of funding identified in my main Proof of Evidence [APP/1.1] and through the use of prudential borrowing.

Scheme Benefits (10.1-10.4)

The Objector’s Evidence

34. In paragraph 10.2 of his proof of evidence [OBJ/10/P1.1], Mr van der Lande states with respect to modelled data that *“The base data is generated from assumed traffic flows and information assessed from the application made in 2003 and presented along with other data in the 2005 Inquiry, which determined the benefits that informed the 2010 modelling is not reflective of current movements”*.
35. In paragraph 10.3 of his proof of evidence [OBJ/10/P1.1], Mr van der Lande states *“While there is reference to reduced bus usage as a benefit it is unclear what the effect*

on services will be.”

The Promoter’s Response

David Carter

36. In respect of paragraph 10.2 and 10.4 in his Proof of Evidence [**OBJ/10/P1.1**], Mr van der Lande appears to assert that the base data [for the current appraisal] uses traffic flows and information produced in 2003 and that without current information the assumed benefits cannot be demonstrated or determined.
37. As I explain in my main proof of evidence [**APP/2.1**] at section 3.3.5, the benefits appraisal is based on outputs from the strategic transport model called PRISM (Policy Responsive Integrated Strategy Model) developed as a strategic model for the West Midlands by the seven district authorities, Highways England and West Midlands Combined Authority.
38. The PRISM model has a base year of 2011 and is capable of forecasting the total demand for private and public transport across the study area. Most of the data underpinning the model was collected or sourced between 2010-2012. The current appraisal of the key monetised (including User Benefits) is a new assessment based on the PRISM 2011 base year, in future year forecasting mode, and does not rely on the assessments that were used to support the 2005 Order application. It is not clear what the reference to 2010 modelling refers to.
39. The PRISM Data Summary Report, which appears in Appendix A the Wednesbury to Brierley Hill Business Case - Economic Case [**WBHE/D7/A**], provides full details of the key 28 data sources used in the model. This report was drafted for PRISM 4.5 but is also applicable to PRISM Version 4.6. The PRISM Local Model Validation Report and Forecasting Reports also are provided in Appendix A to the Wednesbury to Brierley Hill Business Case - Economic Case [**WBHE/D7**].
40. In respect of paragraph 10.3 in his Proof of Evidence [**OBJ/10/P1.1**] Mr van der Lande refers to bus services. Bus services in the West Midlands are of course de-regulated and therefore WMCA has no control over how private sector operators will respond to the operation of the WBHE. However, in order to undertake the WBHE appraisal, this has been considered in the Outline Business Case. Paragraph 3.10 of the Economic Case [**WBHE/D7**] on page E-6 sets out the Do Something scenario that incorporates a series of changes to the bus service frequencies and routes in order to represent a possible ‘neutral’ bus operator response to the new Wednesbury to Brierley Hill Metro

Extension (as opposed to any possible overtly ‘competitive’ or ‘complementary’ response that bus operators may adopt to the presence of the Metro). Following a review of the bus network in the vicinity of the WBHE (Appendix B [WBHE/D7/A]), a series of indicative route and frequency changes have been made to several bus routes in the vicinity of the WBHE. Table 3.2 sets out the changes made to the public transport model. I concluded that these changes would not have a material impact either on the visitor throughout or operations of the Merry Hill shopping centre.

41. Indeed, over time, with increasing public transport accessibility and shopping centre usage generated by the WBHE, I would expect that the public transport market as a whole would be able to grow, with the potential to support enhanced service delivery throughout the area.

Scheme Design (11.1-11.3)

The Objector’s Evidence

42. In paragraph 11.1 of his proof of evidence [OBJ/10/P1.1], Mr van der Lande states that *“The proposed scheme may envisage a tram stop adjoining the Dudley Canal, in a location consistent with that proposed by the 2005 Order.”*
43. In paragraph 11.2 of his proof of evidence [OBJ/10/P1.1], Mr van der Lande states that *“Insufficient detail has been provided to demonstrate routes for passengers from the significantly elevated position that any tram stop would occupy in close proximity to Dudley Canal. Links from the 2005 Order do not show any access detail which might help inform discussion.”*
44. In paragraph 11.3 of his proof of evidence [OBJ/10/P1.1], Mr van der Lande states that *“Whether pedestrian, disabled or people with young children, the current direct route to Dudley Canal to path is through a series of tiered external stairs or a potentially significantly extended route through a series of ramped pedestrian routes which are not demonstrated as being compliant with disabled access requirements.”*

The Promoter’s Response

Ian Collins

45. A walkway, lift shaft and stair well will link the Merry Hill tram stop with The Merry Hill Shopping Centre. Please refer to paragraph 11.6.7 of my main proof of evidence [APP/P3.1] and pages 116 and 117 of the approved Street Design Guide [WBHE/F17],

where more details are provided.