

Mr P Lewis and Mrs E Worthington
The Planning Inspectorate
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6PN

02 October 2025

Dear Inspectors,

South Worcestershire Development Plan review – Updated evidence in respect of the proposed allocation of Mitton (SWDPR54)

I have reviewed the recent submission of a revised layout for the proposed widening of the M5 Junction 9 northbound off-slip (PJA Drawing No. 07438-CI-SK01). The revised drawing shows a nearside lane extension of 74.13m, giving a total nearside lane length of 113.46m. I do not consider this an acceptable arrangement.

A 16.75m taper (1 in 5) is shown at the southern end of the extended lane. This is extremely short and unlikely to be acceptable in this high speed environment for highway safety reasons. The existing taper for the nearside lane is around 70m in length and demonstrates what National Highways is likely to find acceptable. The previous drawing (PJA Drawing No. 07438-CI-SK03) that purported to show a 113m nearside lane length was based on a taper of 1 in 35 which corresponds to a taper length of 117.25m (lane width of 3.35m x 35).

The total length of works shown in the previous drawing was around 124m (indicated by the length of the orange line of the top section of the previous drawing). The total length of the works in the revised drawing is around 87m (again indicated by the length of the orange line). The revised drawing was provided to seek to assure the Inspectors that a design which accommodated more vehicles (as had been modelled) was achievable. The fact that it is suggested that the total length of works **decreases** in the revised design is clearly absurd if the new drawing is expected to be showing a **longer** nearside lane.

On the basis of replicating the existing 70m flare (a much more gradual taper than shown in the revised drawing, matching the current arrangement, and much more likely to be acceptable to National Highways from a safety standpoint), the total length of works would be in the region of 144m (70m flare plus 74m lane extension), 66% longer than that shown in the most recent drawing. There is an argument that the taper should be even longer than the existing because the longer lane extends further towards the mainline carriageway so that vehicles reaching the start of the taper will be travelling faster than those reaching the existing taper.

I do not consider that this arrangement would be acceptable to National Highways and the widening works would therefore need to be extended (by at least 66% as discussed above) with the associated increase in costs. The narrative accompanying the drawing confirms that the costing is based on the design as shown. I therefore consider that the current cost of £4 million is a significant under-estimate.

During the course of this Examination we have made a number of reasonable requests for additional information and clarification. Many of these were set out at the beginning of the year in my letter to Ian Kemp dated 24 January 2025. At your request we sought to obtain the outstanding information from South Worcestershire Councils. We approached the Councils with the list but this yielded only one report that was until then unavailable. The remaining requests (items 1, 2, 3, 6, 7, 8, 9, 10, 14 in my original letter) that cover a range of important matters concerning the reliability of modelling, the assumptions that underlie the modelling and the interpretation of model outputs remain unanswered. The items/clarifications requested are all matters which would, in my professional experience, normally be provided in response to requests and are important matters without which the adequacy of the transport evidence cannot be properly judged.

I conclude that there remains uncertainty not only about the feasibility and cost of implementing the proposed Junction 9 improvements but also regarding other important aspects of the transport evidence base that is therefore neither complete nor robust.

I trust the above is clear. Please do not hesitate to contact me if you have any queries.

Yours sincerely,

A large black rectangular box redacting the signature of Bruce Bamber.

Bruce Bamber BSc MA MSc MCIHT, Director