

M5 Junction 10 Improvements Scheme

Consultation Report

Appendix M - Statutory Consultation Section 42 Matters Raised

TR010063 - APP 5.2

Regulation 5 (2) (q)

Planning Act 2008

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

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The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

M5 Junction 10 Improvements Scheme Development Consent Order 202[x]

5.2 Consultation Report

Appendix M - Statutory Consultation Section 42 Matters Raised

Regulation Number:	Regulation 5(2)(q)
Planning Inspectorate Scheme Reference	TR010063
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Rev 0	December 2023	DCO Application

Appendix M. Section 42 Matters Raised and Regard Had Table

M.1. Prescribed consultees

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
48	Bloor Homes	Design	The site access does not include any bus priority measures. Bus priority is a key element of the Tewkesbury Road transport strategy, which has been developed in conjunction with Gloucestershire County Council for a number of years.	Yes	The northern verge of the A4019 has been widened to allow for future bus lane provision from the fire station to Gallagher Junction. The right turn lane from A4019 westbound to North West Cheltenham (Elms Park) Allocated Site access has been changed to bus only. The entrance to Park and Ride is added to the west of Safeguarded Site junction to match the developer's design.	The northern verge of the A4019 has been widened to allow for future bus lane provision from the fire station to Gallagher Junction. The right turn lane from A4019 westbound to North West Cheltenham (Elms Park) Allocated Site access has been changed to bus only. The entrance to Park and Ride is added to the west of Safeguarded Site junction to match the developer's design.
51	Bloor Homes	Design	The design does not include any bus priority measures, including the removal of the measures included within the Elms Park access works. Bus priority measures are a key feature of the Tewkesbury Road transport strategy and their removal risks prejudicing delivery of the Western Expansion land. These measures must be fully reinstated within the Elms Park works and included within the	Yes	The northern verge of the A4019 has been widened to allow for future bus lane provision from the fire station to Gallagher Junction. The right turn lane from A4019 westbound to North West Cheltenham (Elms Park) Allocated Site access has been changed to bus only. The entrance to Park and Ride is added to the west of Safeguarded Site junction to match the developer's design.	The northern verge of the A4019 has been widened to allow for future bus lane provision from the fire station to Gallagher Junction. The right turn lane from A4019 westbound to North West Cheltenham (Elms Park) Allocated Site access has been changed to bus only. The entrance to Park and Ride is added to the west of Safeguarded Site junction to match the developer's design.

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			Western Expansion site access / Tewkesbury Road / Link Road design.			
54	Bloor Homes	Environment	Insufficient information has been provided to fully understand how the flood risk and drainage strategy would affect development of the Western Expansion land. This must be provided in the form of a hydraulic model.	N/A	<p>The hydraulic model has been provided to the Environment Agency and has been further documented in separate Baseline Modelling and Scheme Modelling reports. Environment Agency has reviewed the baseline model. Discussions on the Scheme modelling, and embedded mitigations have also been held with the Environment Agency. Details are provided in the Environmental Statement (Chapter 8).</p> <p>A drainage strategy has been produced as a live document. This describes how the new and old surfaces drain, and how the discharges are regulated from flow, volume, and quality perspectives. A copy of the drainage strategy is included as Appendix 2.1 in the Environmental Statement.</p>	
55	Bloor Homes	Design	The consultation documents do not include any information describing why a single vehicular access is considered	Yes	The central reserve between the Link Road Junction and Uckington Junction has been widened to accommodate the	The central reserve between the Link Road Junction and Uckington Junction has been widened to

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			to be appropriate for the Western Expansion land and why a secondary access could not be delivered. Justification must be provided for this design choice.		potential for a future junction and right turn lane.	accommodate the potential for a future junction and right turn lane.
57	Bloor Homes	Design	The Scheme design provides a site access from Tewkesbury Road up to the boundary of the land, which is promoted by, and under Option agreement with, Bloor Homes. This is supported and must be delivered in full. Any other design options, interim or otherwise, that fail to provide the full design as presented would not be acceptable.	Yes	An indicative layout to accommodate Bloor Homes request was shown in the Statutory Consultation design. This indicative access is now replaced with a field access only. This is due to the status of land (Safeguarded Site), which is only "safeguarded" for future development. The Applicant has assessed a layout in the traffic modelling to ensure that a junction with sufficient capacity is feasible at this location and the proposals of the Scheme will not restrict any such provisions in future. Under the Scheme proposal, the northern arm will be for field access opposite Link Road Junction and future proofing the highway layout for the provision of a future main access junction for Safeguarded Site development. It is the responsibility of the developer to develop the Safeguarded Site access and obtain the required	An indicative layout to accommodate Bloor Homes request was shown in the Statutory Consultation design. This indicative access is now replaced with a field access only. This is due to the status of land (Safeguarded Site), which is only "safeguarded" for future development. The Applicant has assessed a layout in the traffic modelling to ensure that a junction with sufficient capacity is feasible at this location and the proposals of the Scheme will not restrict any such provisions in future. Under the Scheme proposal, the northern arm will be for field access opposite Link Road Junction and future proofing the highway layout for the provision of a future main access junction for Safeguarded Site development. It is the responsibility of the developer to develop the Safeguarded Site access and obtain the required planning permission as part of the wider Safeguarded Site planning application.

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					planning permission as part of the wider Safeguarded Site planning application.	
59	Bloor Homes	General	The main objective of the Scheme, and subsequent business case for funding approval, is centred on facilitating growth in jobs and housing, including the Safeguarded land. Any Scheme that did not fully provide access to the Bloor Homes land would not meet these objectives and would not be acceptable.	Yes	An indicative layout to accommodate Bloor Homes request was shown in the Statutory Consultation design. This indicative access is now replaced with a field access only. This is due to the status of land (Safeguarded Site), which is only "safeguarded" for future development. The Applicant has assessed a layout in the traffic modelling to ensure that a junction with sufficient capacity is feasible at this location and the proposals of the Scheme will not restrict any such provisions in future. Under the Scheme proposal, the northern arm will be for field access opposite Link Road Junction and future proofing the highway layout for the provision of a future main access junction for Safeguarded Site development. It is the responsibility of the developer to develop the Safeguarded Site access and obtain the required planning permission as part of the wider Safeguarded Site planning application.	An indicative layout to accommodate Bloor Homes request was shown in the Statutory Consultation design. This indicative access is now replaced with a field access only. This is due to the status of land (Safeguarded Site), which is only "safeguarded" for future development. The Applicant has assessed a layout in the traffic modelling to ensure that a junction with sufficient capacity is feasible at this location and the proposals of the Scheme will not restrict any such provisions in future. Under the Scheme proposal, the northern arm will be for field access opposite Link Road Junction and future proofing the highway layout for the provision of a future main access junction for Safeguarded Site development. It is the responsibility of the developer to develop the Safeguarded Site access and obtain the required planning permission as part of the wider Safeguarded Site planning application.

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60	Bloor Homes	Design	The Scheme changes the safeguarded land access to a signalised junction. This would offer improved facilities for non-motorised users and is supported in principle. It should still be ensured that the access would provide sufficient capacity to accommodate forecast traffic flows.	Yes	The proposed junction remains as a signalised junction and has been designed to accommodate forecast traffic based on the trajectory provided by the Joint Core Strategy for the business case. However, the number of lanes on the future development arm of the junction has been reduced in the latest design. The design allows for the future upgrade of the northern arm by the developer.	The proposed junction remains as a signalised junction and has been designed to accommodate forecast traffic based on the trajectory provided by the Joint Core Strategy for the business case. However, the number of lanes on the future development arm of the junction has been reduced in the latest design. The design allows for the future upgrade of the northern arm by the developer.
62	Bloor Homes	Design	We asked for a review of the termination of the 'stub access' to the safeguarded land to provide a road to the boundary with Bloor Homes land. This has been accommodated within the design and is supported.	N/A	We note that this change in design is supported.	
63	Bloor Homes	Design	It is disappointing that the second access to the safeguarded land from Tewkesbury Road to the east of the new roundabout has not been considered within the design. The proposed scheme should include measures to ensure that secondary access can be provided at a later stage if necessary.	Yes	The central reserve between the Link Road Junction and Uckington Junction has been widened to accommodate the potential for a future junction and right turn lane.	The central reserve between the Link Road Junction and Uckington Junction has been widened to accommodate the potential for a future junction and right turn lane.

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65	Bloor Homes	Active travel	The inclusion of the segregated cycle route on the new link road to provide a route between the safeguarded land and west of Cheltenham, and a new crossing on the A4019 is welcomed.	N/A	We note that this change in design is supported.	
66	Bloor Homes	Active travel	Additional details on the cycle route design on the northern side of A4019 appear to be included in the current design, which is welcomed, although a full assessment will be required within later design stages.	Yes	The Scheme design has been updated to provide segregated walking and cycling facilities alongside the A4019 through Uckington.	The Scheme design has been updated to provide segregated walking and cycling facilities alongside the A4019 through Uckington.
68	Bloor Homes	Traffic	The principle of the Scheme presented to provide a grade-separated traffic signal-controlled roundabout is supported.	N/A	We note that this change in design is supported.	
69	Bloor Homes	Active travel	The Scheme design seeks to provide a mostly segregated walking and cycling route on the northern side of Tewkesbury Road, except where it passes through Uckington.	Yes	The Scheme design has been updated to provide segregated walking and cycling facilities alongside the A4019 through Uckington.	The Scheme design has been updated to provide segregated walking and cycling facilities alongside the A4019 through Uckington.
70	Bloor Homes	Traffic	There is no information provided such as junction modelling or traffic flow	N/A	This comment was taken into consideration. Traffic modelling details have been shared as part	

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			forecasts which would indicate how M5 Junction 10, or any other part of the highway network, would operate in future. Given that the Scheme will allow southbound access to the M5, it should be recognised that there will be significant uncertainty in future traffic flow demands.		of ongoing engagement. It had formed a part of the Development Consent Order submission.	
72	Bloor Homes	Traffic	Forecast traffic flow demands from the Western Expansion and any modelling information for the proposed new access have not been provided.	N/A	Traffic modelling details have been shared as part of ongoing engagement. Assuming the Western Expansion refers to the development sites, there are in total 6 access points to these three development sites. Traffic flow information to and from these access points at various forecast years and under different scenarios is available. The Traffic Forecasting Report includes some of such information and additional information can be made available upon request.	
74	Bloor Homes	Design	The Scheme provides access to the Bloor Homes land to deliver jobs and housing, which is the main objective of the Scheme and fundamental to the business case funding	Yes	An indicative layout to accommodate Bloor Homes request was shown in the Statutory Consultation design. This indicative access is now replaced with a field access only.	An indicative layout to accommodate Bloor Homes request was shown in the Statutory Consultation design. This indicative access is now replaced with a field access only. This is due to the

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			approval. Any alternative to this Scheme which fails to provide full access to the land, including any interim access solution, would result in a very strong objection to the Scheme.		This is due to the status of land (Safeguarded Site), which is only "safeguarded" for future development. The Applicant has assessed a layout in the traffic modelling to ensure that a junction with sufficient capacity is feasible at this location and the proposals of the Scheme will not restrict any such provisions in future. Under the Scheme proposal, the northern arm will be for field access opposite Link Road Junction and future proofing the highway layout for the provision of a future main access junction for Safeguarded Site development. It is the responsibility of the developer to develop the Safeguarded Site access and obtain the required planning permission as part of the wider Safeguarded Site planning application.	status of land (Safeguarded Site), which is only "safeguarded" for future development. The Applicant has assessed a layout in the traffic modelling to ensure that a junction with sufficient capacity is feasible at this location and the proposals of the Scheme will not restrict any such provisions in future. Under the Scheme proposal, the northern arm will be for field access opposite Link Road Junction and future proofing the highway layout for the provision of a future main access junction for Safeguarded Site development. It is the responsibility of the developer to develop the Safeguarded Site access and obtain the required planning permission as part of the wider Safeguarded Site planning application.
75	Bloor Homes	General	Bloor Homes formally registers a very strong objection to the compulsory acquisition of any land (permanent and temporary works land) until such time as this issue has been resolved to their satisfaction and there is a clear agreement on the level and	N/A	Safeguarded Site is currently only 'safeguarded' for development and therefore is it considered inappropriate to provide a full development access. The Applicant will continue to liaise with all stakeholders on the short term and long term access	

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			nature of any compensation that will be payable on the basis that this is a safeguarded development site.		arrangements for the land to the north of the A4019.	
76	Bloor Homes	Traffic	There has been no publication of any of the supporting traffic modelling information. This reduces the ability to meaningfully comment on the Scheme design. Traffic modelling information must be provided to justify the design proposals.	N/A	Traffic modelling has been undertaken and included in the Transport Assessment which forms part of the Development Consent Order submission	
77	Bloor Homes	Design	Consideration should be given to providing a secondary access to the Safeguarded land, or to allow for one in future. This has not been provided.	Yes	The central reserve between the Link Road Junction and Uckington Junction has been widened to accommodate the potential for a future junction and right turn lane.	The central reserve between the Link Road Junction and Uckington Junction has been widened to accommodate the potential for a future junction and right turn lane.
78	Bloor Homes	Active travel	The cycle route is reduced to shared-use, presumably due to the restricted width of the highway corridor. Options should be considered to improve this section, which could include widening the route beyond the 3m minimum where possible.	Yes	The Scheme design has now been updated to provide segregated walking and cycling facilities alongside the A4019 through Uckington.	The Scheme design has been updated to provide segregated walking and cycling facilities alongside the A4019 through Uckington.
79	Bloor Homes	Active travel	The route narrows adjacent to a bus stop, this is not appropriate as there would be	Yes	The Scheme design has now been updated to provide segregated walking and cycling	The Scheme design has now been updated to provide segregated walking and cycling facilities through

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			higher levels of pedestrians congregating in conflict with cyclists.		facilities through Uckington. The proposed eastbound bus stop has now been moved to the east of the Uckington junction, closer to the proposed signalised pedestrian crossing of the A4019. The design includes a bus stop with a 3.5m wide island provided between the bus stop and the cycle track. A zebra crossing of the cycle track is included to allow pedestrians to cross the cycle path to the footway maintaining segregation between the cyclist and pedestrian facilities.	Uckington. The proposed eastbound bus stop has now been moved to the east of the Uckington junction, closer to the proposed signalised pedestrian crossing of the A4019. The design includes a bus stop with a 3.5m wide island provided between the bus stop and the cycle track. A zebra crossing of the cycle track is included to allow pedestrians to cross the cycle path to the footway maintaining segregation between the cyclist and pedestrian facilities.
82	Bloor Homes	Active travel	The cycle route design through Uckington does not comply with the guidance set out within Local Transport Note 1/20. This section of the route will act as a deterrent to cycling between the Western Expansion land and Cheltenham town centre. The design must be revisited to ensure compliance with Local Transport Note 1/20.	Yes	The Scheme design has now been updated to provide segregated walking and cycling facilities alongside the A4019 through Uckington.	The Scheme design has been updated to provide segregated walking and cycling facilities alongside the A4019 through Uckington.
230	National Highways	Environment	It is noted that the LV is now 20µg/m ³ for PM2.5. (Table 5-1) and with the PM2.5 change in concentration there is no risk	N/A	Comparisons to PM2.5 Air Quality thresholds will be presented in the Environmental Statement will be updated	

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			of LV compliance issue with the scheme. This can be done by utilising PM10 values if necessary (Paragraph 5.1.49). Generally, with reference to 2.92 of LA105, magnitude of change shouldn't be assigned to individual receptors as it's meaningless, they are intended to inform the significant test rather than saying there is medium changes at receptors that don't exceed.		to present concentrations rather than change where modelled receptors are below the Air Quality threshold.	
231	National Highways	Environment	References to the Design Manual for Roads and Bridges methodology for consideration of significant effects in the short term should be provided, particularly in relation to 1dB change and exceedance of the Significant Observed Effect Level. As this is a local authority scheme, if consultation is undertaken with other local authority departments, the reporting of this should be factual and clearly state who will or has been consulted, why and the reason why the consultation work hasn't been completed to date. This clarity will help	N/A	More information on the short term assessment, as well as the consultation process has been included in the Environmental Statement.	

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			understanding where there is potential for significant environmental effects.			
232	National Highways	Environment	National Highways also have data available on EnvIS (Environmental Information Systems) which confirms the locations of Noise Important Areas on the strategic road network and confirms where low noise surfacing has previously been deployed. The Applicant should consider accessing this data source and referring to the information in the Environmental Statement to be produced with a note included to say this will be the case. Additionally, it should offer clarity as to why only daytime noise was assessed.	N/A	The Environmental Statement includes the additional information, including night time assessment.	
233	National Highways	Environment	In terms of survey approach, attention should be given to the translation between Phase 1 and UK Habitat Classification not always being direct, therefore the necessary surveys should be undertaken using UK Habitat Classification, assessing conditions accordingly. Translation of Phase 1 isn't	N/A	This has been identified as a limitation in the Biodiversity Net Gain assessment, with UK Habitat surveys undertaken to address this. The results of these surveys have been used in the assessment of the Biodiversity Net Gain for the Scheme. Details of the methodology and the results are reported in the Environmental Statement.	

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			considered a robust approach to establish the biodiversity baseline.			
234	National Highways	Environment	In terms of scheme design compliancy, as the design develops it should also include that it is both Design Manual for Roads and Bridges and Water Framework Directive compliant.	N/A	The Scheme has been designed in line with Design Manual for Roads and Bridges and Water Framework Directive legislation to ensure it is compliant with both.	
235	National Highways	Environment	Maintenance responsibilities for bat roosts where created need to be considered. It was also noted that n-dep hasn't been considered quantitatively to inform assessment at this stage so this will need to be referenced.	N/A	Further detail has been included in the Environmental Statement.	
236	National Highways	Environment	Clarification should be given around the availability of the results of the Geophysical survey undertaken in 2020 and subsequent surveys to be included within the Environmental Statement.	N/A	The full results of the geophysical survey and trenching have informed the Environmental Statement.	
244	National Highways	Design	If the scheme stops up any of the land we own, it will need to be identified and National Highways duly informed. As the indicative layout of just the M5 Junction 10 for	N/A	The drawings that form part of the Development Consent Order application show all this information. The Applicant has continued to	

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			consultation doesn't show the scheme to the North and South, the Scheme Plan is satisfactory but it's not clear what works or powers are proposed outside the area shown on this plan and we request that additional information is provided. Further discussion will be required upon receipt of this information regarding the use of existing Operational Land and whether the land is to be considered a permanent or temporary acquisition. Any land acquisition required for the scheme should not impede the safe operation and maintenance of the Strategic Road Network.		liaise with National Highways to clarify the position.	
246	National Highways	Active Travel	The Indicative General Arrangement Plan shows the welcome provision of new cycle paths and footways along the local road network. With regard to the section to the west of the M5, this terminates shortly after the junction and merges into a narrow footway on the northern side of the A4019. It is considered that the plan	Yes	This comment is noted, and such provision has been incorporated into the scheme design. This includes features to provide a connection between the off-road facility and the carriageway (and vice versa).	A transition is needed for cyclists in both directions given there are no off-carriageway cycling facilities to the west of the Scheme extents. These facilities have now been included in the scheme design. A discussion considered the options and facilities immediately to the east of the Stanboro Lane junction was chosen. This would allow eastbound cyclists to avoid the complication of negotiating a shared use path

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			<p>should show a direct access onto the cycle path from the eastbound carriageway of the A4019 (just after the bus stop) so that this can be accessed before the motorway junction and without having to cross the road markings of the earlier junction. Additionally, some further thought must be given to how cyclists travelling west on the new cycle path can safely access the westbound carriageway of the A4019 to continue their journey. Such changes would help reduce the number of cyclists entering the carriageway of the junction and incentivise more local journeys by bike.</p>			<p>across the Stanboro Lane junction as well as providing a simple slip from carriageway to cycle track. For westbound cyclists on the cycle track, there would be a turn through nearly 90 degrees to reach a refuge in an extension of the central reserve where they would wait for a gap in traffic exiting the Junction 10 roundabout. This would be the only direction of travel across the cycle route; visibility to approaching vehicles would be expected to be sufficient to allow an informed judgement about when to cross. On the nearside of the westbound A4019 lane there would be a 'jug handle' arrangement to allow cyclists to move alongside westbound traffic which would lead into a transition from cycle track to cycle lane; this would subsequently terminate. This transition would provide protection from following vehicles until the cyclists are fully merged with other traffic. Cyclists would also be able to join the carriageway directly from the crossing if they felt this was more appealing or a safe transition in the absence of vehicles.</p>
247	National Highways	General	It has been noted that there will be some directional drilling	N/A	National Highways have been fully involved in the design	

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			by Statutory Undertakers involved which could have an impact on the safe operation and maintenance of the Strategic Road Network. It is noted that a site visit during the Preliminary Design Stage is being arranged between the affected parties which will provide further information.		process and the initial proposals for directional drilling have been developed in conjunction with them to ensure the safe operation and maintenance of the Strategic Road Network. Further information will be provided as part of detail design.	
251	National Highways	Environment	It is noted that the Historic Statement should be characterised using the current Scheme boundary at the very least and the limitations to the magnitude of impact stated if it isn't possible to undertake the assessment of impacts on it. Clarification around the availability of its assessment which will follow the next design fix should be included within the Environmental Statement.	N/A	The study area for the assessment of the impacts to the historic environment is defined by the Development Consent Order Limits for a Scheme. The methodology for identifying the magnitude of impact has been presented as part of the Preliminary Environmental Information Report and is included as part of the Environmental Statement.	
253	National Highways	Environment	Clarification is needed as to where responsibility will lie with delivering mitigation for cumulative effects being provided through "archaeological recording that provides a landscape scale	N/A	The ultimate responsibility for the mitigation lies with the developer. The "landscape scale" interpretation does not mean that work is required outside of the Development Consent Order Limits, only those recent	

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			interpretation of the information recovered"		investigations in the area need to be considered when interpreting the results to provide an understanding beyond the specific remains impacted by the Scheme.	
254	Historic England	Environment	Historic England has reviewed the Preliminary Environmental Information Report and considers that there is not enough information to provide a clear understanding of the nature and full extent of the potential impacts on the historic environment as required either by the Environmental Impact Assessment regulations, National Planning Statements or the National Planning Policy Framework.	N/A	Further information is provided as part of the Environmental Statement, including an assessment of the potential impacts to the Scheduled Monument and Listed Buildings at Moat House.	
257	Historic England	Environment	Historic England has concerns regarding the level of information provided regarding the highly designated heritage asset of Uckington Moated Site (a scheduled monument and several listed buildings). We feel that some aspects of the scheme in its current form will impact on and cause harm to the significance of the asset	N/A	Following further work, the new link between Cooks Lane and Moat Lane and the creation of passing bays along Moat Lane has been removed from the Scheme design. This will reduce the proximity of the Scheme to Moat House. An assessment of the setting of the Scheduled Monument and the Listed	

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			through a change in its setting, which contributes to its significance.		Buildings is presented as part of the Environmental Statement.	
258	Historic England	Environment	In our view proportional and refined information is necessary to understand these impacts upon designated heritage assets in their landscape setting. The level of carefully considered information that in our view is required is proportional to the issues we have identified in relation to the proposed scheme, and directly related to the need to assess the overall sustainability of the development.	N/A	Setting assessments for designated heritage assets have been conducted as part of the assessments and are reported on in the Environmental Statement. Results of the setting assessments have been provided to the Landscape and Design teams and embedded mitigation has been included in the design.	
259	Historic England	Environment	We will not be providing detailed comments on the assessment of non-designated archaeological remains which we recommend should be addressed in further consultation with Gloucestershire County archaeological advisors.	N/A	Consultation with the Gloucestershire County Council archaeological advisors is ongoing and has informed geophysical survey, trial trenching, and proposed mitigation works.	
265	Historic England	Environment	In general terms, Historic England advises that a number of considerations will need to be taken into account when proposals of this nature are	N/A	All of these elements have been considered in the development of the study area and impact assessments and have been	

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			<p>being assessed. This includes consideration of the impact of ancillary infrastructure and development, including local link roads and drainage proposals: The potential impact upon the landscape, especially if a site falls within an area of historic landscape; Direct impacts on historic/archaeological fabric (buildings, sites, or areas), whether statutorily protected or not. All grades of listed buildings should be identified; Other impacts, particularly the setting of listed buildings, scheduled monuments, registered parks and gardens, conservation areas etc, including long views and any specific designed views and vistas within historic designed landscapes. In some cases, intervisibility between historic sites may be a significant issue; The potential for buried archaeological remains; Effects on landscape amenity from public and private land; Cumulative impacts.</p>		<p>addressed in the submitted Environmental Statement.</p>	

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266	Historic England	Environment	<p>There is one particular highly designated heritage asset - Uckington Moated site, we do wish to comment on. This asset consists of a number of designations, namely:</p> <ul style="list-style-type: none"> • Moat House moated site Scheduled Monument (Mon. No. 32340, NHLE 1016835). • Moat House Grade II Listed Building (NHLE 1091874) . • Barn circa 30 metres north west of The Moat House Grade II Listed Building (NHLE 1340069). • Bridge and attached pair of lodges Moat House Grade II Listed Building (NHLE 1154528). 	N/A	<p>All of these are included in the study area and have been assessed for impacts to setting. The heritage receptors listed in the comment have been covered within the Environmental Statement.</p>	
268	Historic England	Environment	<p>The improvements to Junction 10 and the dualling of the A4091 will increase vehicle use of the road into Cheltenham. Close to the site at the end of Moat Lane there will be a signal-controlled junction, which will increase movement, noise, and lighting on the approach to the moated site.</p>	N/A	<p>A setting assessment has been conducted for the designated assets at Moat House in order to understand how the surroundings contribute to the assets' significance. This has informed the Environmental Statement.</p>	
277	Historic England	Environment	<p>The water quality within the moated site is also of concern</p>	N/A	<p>A site survey has been undertaken by the Applicant's</p>	

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			and how or if the proposed works will impact on that; through changes in the water table or run-off from the road. The moat is fed from a spring and there is a series of channels and waterways that feed and drain the site. A better understanding of how this works will be needed to ensure that the proposed works do not affect this and cause a reduction of waterflow or contaminates the water. Either of which would cause harm to the significance of the archaeological interest of the site.		groundwater team. The initial assessment from a survey undertaken by the groundwater team is that the spring feeding the moat is a locally fed spring that is highly unlikely to be affected by the design of the Scheme. Detail has been added into the Register of Environmental Actions and Commitments to avoid dewatering issues during construction. Water for construction activities will not be sourced from groundwater supply in this area for example.	
278	Historic England	Environment	The demolition of the three bungalows to the east of Moat Lane, along the A4091 will remove the current protection they give to the Moated site. They form a noise and visual barrier between the road and the Moated site. The increase in noise, fumes and potentially lighting will further urbanise this stretch of road. This change and the impact this causes needs to be included the Cultural Heritage, of the Environmental Statement. The	N/A	A setting assessment has been conducted for the designated assets at Moat House in order to understand how the surroundings contribute to the assets' significance. This has informed the Environmental Statement.	

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			Preliminary Environmental Information Report states that a setting study of the designated heritage asserts will be undertaken for the Environmental Statement. The Preliminary Environmental Information Report, however, goes on to state that the setting of the Moated site is confined to its borders and that the scheme will not impact on its significance as a good example of a medieval moated site. We do not agree with this assessment and have outlined above our assessment of how the rural setting of the moated site contributes to its significance.			
282	Historic England	Environment	Mitigation measures to reduce any harm will need to be included within the Environmental Statement and Construction Environmental Management Plan.	N/A	Mitigation measures are expected to include embedded mitigation (mitigation measures within the design) as well as additional mitigation to minimise or off-set impacts to the significance of heritage assets. These form part of the Archaeological Management Plan (which will be produced as part of the second iteration of the Environmental Management Plan), Register of Environmental	

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					Actions and Commitments and Environmental Management Plan, requirements of the Development Consent Order.	
283	Historic England	Environment	The National Policy Statement for National Networks polices for the Historic Environment state that the Applicant should describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant Historic Environment Record should have been consulted and the heritage assets assessed using appropriate expertise. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, the applicant should include an appropriate desk-based assessment and, where necessary, a field evaluation.	N/A	The Gloucestershire Historic Environment Record, along with the National Heritage List for England, has been consulted. Setting assessments have been included to inform the Environmental Statement, and field investigations have been conducted to inform the Environmental Statement and Archaeological Management Plan.	

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
297	Historic England	Environment	The applicant should also look at opportunities to enhance or better reveal significance of heritage assets through the new development.	N/A	Opportunities to enhance or better reveal the significance of heritage assets have been considered as part of the development of the mitigation measures developed for the Scheme and as part of the Archaeological Management Plan.	
298	Historic England	Design	Of more concern is the proposal to widen Moat Lane and connect it to Cooks Lane to the west. This will be to improve ease of access for the residents and businesses in the area. Although these two Lanes are connected by a footpath, and in the past a farm track, the widening and connection of these two rural single-track roads will impact on the rural character which contributes to the significance of the Moated site.	Yes	Following further work, the new link between Cooks Lane and Moat Lane and the creation of passing bays along Moat Lane have been removed from the scheme design. This will reduce the proximity of the Scheme to Moat House. An assessment of the setting of the Scheduled Monument and the Listed Buildings is presented as part of the Environmental Statement.	The proposed new link between Cooks Lane and Moat Lane has been removed from the latest version of the design. The latest proposal connects Cooks Lane to West Cheltenham Link Road via the access road which also serves a small number of properties including Forge House. The latest design also removes the Cooks Lane junction with the A4019.
300	Historic England	Environment	Historic England Position and Recommendation for Next Steps Historic England recognises the need for this road improvement and has no comments to make on the works to the Junction, or the	Yes	The new link proposed between Cooks Lane and Moat Lane, and the creation of passing bays along Moat Lane have been removed from the design.	The new link proposed between Cooks Lane and Moat Lane, and the creation of passing bays along Moat Lane have been removed from the design. The Moat Lane / A4019 junction has been realigned so that the Moat House buildings are no longer in line

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			Link Road. We do however have a concern regarding the widening of the A4019 and the current proposals for the widening and joining of Moat and Cook Lane. This is because we feel that this will cause harm to the highly designated heritage asset - Uckington Moated Site - through the urbanising of its immediate rural setting which contributes to its significance.			of sight of the Moat Lane / A4019 junction.
301	Historic England	Environment	<p>To better inform the Environmental Statement Cultural Heritage Chapter we recommend that:</p> <ul style="list-style-type: none"> • A more thorough settings assessment of this designated heritage asset is undertaken • Further work is needed on understanding the water system that feeds and drains the moat to ensure there is no loss of levels, flow or quality through the proposed works. • Further work is needed on providing suitable noise and visual screening between the new road and the Moated Site. This should be in the form of natural barriers (hedges and trees) to retain the rural 	Yes	<p>A setting assessment has been undertaken and reported in the Environmental Statement. The water system that feeds and drains the moat has been considered and reported on within the Environmental Statement. Landscape design considers the implementation of planting for visual screening to Moat House. The new link proposed between Cooks Lane and Moat Lane, and the creation of passing bays along Moat Lane have been removed from the design.</p>	<p>The new link proposed between Cooks Lane and Moat Lane, and the creation of passing bays along Moat Lane have been removed from the design. The Moat Lane / A4019 junction has been realigned so that the Moat House buildings are no longer in line of sight of the Moat Lane / A4019 junction.</p>

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			character. • In consultation with the Local Community and Parish alternatives to the Moat and Cook Lane joining and widening are found which better protects the rural setting of the Moated site.			
304	UK Health Security Agency - Public Health England	Environment	The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups, and individual people. Although assessing impacts on health beyond direct effects from, for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.	N/A	An air quality assessment has been prepared in accordance with best practice guidance, specifically LA105 published by National Highways.	

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305	UK Health Security Agency - Public Health England	Environment	The application has not fully assessed the impact of PM2.5. In the Air Quality chapter of the Preliminary Environmental Information Report, the applicants state that “as per the Design Manual for Roads and Bridges LA 105 (paragraph 2.21.4), there is no requirement to include PM2.5 in the air quality assessment”. We agree that the Design Manual for Roads and Bridges LA 105 states that there is no need to model for PM2.5 but would argue, as the UK has national air quality standards for PM2.5 and the Design Manual for Roads and Bridges LA 105 is planning on requiring air quality assessments to consider PM2.5, that the applicants should assess possible emissions of this pollutant. UK Health Security Agency’s position is that reducing public exposures to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards has potential public health benefits. We support approaches which	N/A	A comparison to PM2.5 Air Quality thresholds is presented in the Environmental Statement.	

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			minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure), and maximise co-benefits (such as physical exercise) and encourage their consideration during development design, environmental and health impact assessment, and development consent.			
306	UK Health Security Agency - Public Health England	Environment	We note that the application has not addressed our previous comments on Electric and Magnetic Fields and request that this is considered. In our response to the Scoping Consultation it was noted that “the current proposals do not appear to consider possible health impacts of Electric and Magnetic Fields. We request that the Environmental Statement clarifies this and if necessary, the proposer should confirm either that the proposed development does not impact any receptors from potential sources of Electric and Magnetic Fields; or ensure that an adequate assessment of the possible impacts is	N/A	The potential for electric and magnetic fields to be generated by the Scheme have been reviewed and comment has been made in the Environmental Statement.	

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			undertaken and included in the Environmental Statement”.			
308	UK Health Security Agency - Public Health England	Environment	The Preliminary Environmental Information Report notes a significant level of further consultation will be undertaken with the local community and stakeholders. As such the PEIR provides assumed impacts and lacks the detail available from the traffic assessment, walking cycling and horse-riding survey and input from the community, owners, or users of community assets to inform the assessment of sensitivity or significance. This situation also prevents the full consideration of potential benefits and opportunities presented by the scheme, particularly to reduce severance and improve Walking, Cycling and Horse Riding infrastructure. The report proposes to provide further detail within the final Environmental Statement. This prevents early dialogue and changes to the scheme design, mitigation, or delivery of additional benefits.	N/A	The process the Scheme has followed with regards to consultation, is in line with Development Consent Order guidance. Ongoing stakeholder engagement and dialogue has been maintained during the production of the Environmental Statement.	

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309	UK Health Security Agency - Public Health England	Environment	<p>The structure of the Population and Human Health chapter of the Preliminary Environmental Information Report prevents a clear understanding of the findings of the assessment so far. The report format follows the assessment process rather than being community centred which makes it very difficult to follow the assessment for each affected community or receptor.</p> <p>The Chapter should be structured such that a reader can consider route wide and then consider each local community, sensitive population, or community asset. This avoids the need for repetition and enables the assessment methodology to be followed for each community, sensitive population, or community asset.</p>	N/A	<p>The Design Manual for Roads and Bridges LA112 methodology has been followed for the Environmental Statement. This does not prescribe whether the findings should be sub-topic based or receptor-centric and it is considered that either is acceptable. This has been reviewed once the assessment was finalised and the Environmental Statement has been drafted in a manner that aims to provide clarity of the effects.</p>	
310	Historic England	Design	<p>We understand that discussions have already taken place regarding alternatives to the Moat and Cook Lanes, and we</p>	Yes	<p>The new link proposed between Cooks Lane and Moat Lane, and the creation of passing bays along Moat Lane have been removed from the design as part of the development of the design.</p>	<p>The proposed new link between Cooks Lane and Moat Lane have been removed from the latest version of the design. The latest proposal connects Cooks Lane to West Cheltenham Link Road via the</p>

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			encourage the investigation of alternatives.			access road which also serves a small number of properties including Forge House. The latest design also removes the Cooks Lane junction with the A4019.
324	Persimmon Homes & Bloor Homes	Design	The PJA design includes an access into a 'Transport Hub' from Tewkesbury Road (left-in only). This is not included within the Gloucestershire County Council Scheme and there is no indication of where it would be provided.	Yes	The design has been updated to include the access to the Transport Hub.	The design has been updated to include the access from the A4019 eastbound to the Park and Ride.
325	Persimmon Homes & Bloor Homes	Design	There are considerable differences between the PJA design, and the Gloucestershire County Council Scheme designs for this junction. An additional exit lane has been provided from the development, but the bus priority lane has been removed.	Yes	This has been noted and discussions have continued with the developer on the Scheme proposals prior to the submission of the Development Consent Order application. Bus priority measures have been considered as part of the design.	Northern verge of the A4019 has been widened to allow for future bus lane provision from the fire station to Gallagher Junction. Right turn lane from A4019 westbound to North West Cheltenham (Elms Park) Allocated Site access changed to Bus Only. Entrance to Park & Ride added to the west of Safeguarded Site access junction to match the developer's design.
326	Persimmon Homes & Bloor Homes	Design	The Elms Park design includes a pedestrian / cycle route into the development opposite Sandpiper Drive, which is a direct and dedicated non-vehicular access. This is not included within the	N/A	This was combined with the Safeguarded Site access junction to reduce the number of traffic signals along this short length. The Applicant is continuing discussions with the stakeholder and Gloucestershire County	

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			Gloucestershire County Council Scheme.		Council Planning Team on this matter, and details will be confirmed in the Statement of Common Ground.	
327	Persimmon Homes & Bloor Homes	Active Travel	The pedestrian and cycle facilities included in the Gloucestershire County Council junction design would offer an alternative, but on an indirect and non-segregated route.	Yes	The improvement of accessibility for pedestrians and cyclists as a fundamental part of the Scheme is fully supported. However, alternative crossings of the A4019 have been included in the design that better create a balance between reducing severance for pedestrians and cyclists and the number of sets of traffic signals along the A4019.	Segregated cycle and walking facilities have been provided on the northern side of the A4019 for the full extent of the Scheme including Uckington. Crossing facilities have been combined with the signal-controlled junctions to limit the number of sets of traffic signals provided on the A4019.
328	Persimmon Homes & Bloor Homes	Design	Elms Park 'Access B' - There are considerable differences between the PJA and Gloucestershire County Council Scheme designs. Most notably the PJA design only permits buses to turn right into the site and provides a bus gate allowing priority for buses to leave the site. These features are removed from the Gloucestershire County Council Scheme.	Yes	The design of North West Cheltenham (Elms Park) Allocated Site access changed due to the option of a potential right turn ban.	North West Cheltenham (Elms Park) Allocated Site access junction has been relocated slightly to the west to provide an arm opposite the entrance to the Civil Service sports ground and thus become a 4-arm junction. The northern verge of the A4019 has been widened to allow for future bus lane provision from the fire station to Gallagher Junction. Right turn lane from A4019 westbound to North West Cheltenham (Elms Park) Allocated Site access has been changed to Bus Only.
330	Persimmon Homes &	Design	Tewkesbury Road / Retail Park Junction (leading to Access C)	Yes	Bus priority measures have been considered as part of design	The northern verge of the A4019 has been widened to allow for

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	Bloor Homes		- The design for this section removes the bus priority measures included within the PJA design.		development and refinement, including options that would allow for future provision.	future bus lane provision from the fire station to Gallagher Junction.
331	Persimmon Homes & Bloor Homes	Traffic	This junction is the main entrance to the business park element of Elms Park. By restricting access from the east, arriving vehicles would be forced to detour through the residential elements of Elms Park. This could potentially result in knock-on junction capacity effects on the surrounding road network that requires further analysis. This could also necessitate future changes to the internal road layout and road hierarchy of Elms Park. A convoluted access arrangement could also make the business park less attractive to potential occupiers, including during the initial development phases prior to 2031. This would be contrary to the Scheme objectives of supporting economic growth and facilitating growth in jobs.	N/A	This comment is believed to be about the proposal for a right turn ban at Gallagher Junction. Following feedback from Statutory Consultation, a right turn ban at Gallagher Junction is not being taken forward.	

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333	Persimmon Homes & Bloor Homes	Design	The Gloucestershire County Council Scheme does not include any consideration of the access to the Transport Hub. This could prejudice delivery of Elms Park. It is necessary for the Gloucestershire County Council Scheme to either include the Transport Hub access or demonstrate how it could be separately delivered at a later stage.	Yes	The Applicant has liaised with Bloor Homes on this matter. The design has been updated to include the access from the A4019 eastbound to the Park and Ride.	The design has been updated to include the access from the A4019 eastbound to the Park and Ride.
334	Persimmon Homes & Bloor Homes	Traffic	The Gloucestershire County Council Scheme removes all bus priority measures included within the Elms Park designs. Providing bus priority measures is a crucial element of the overall transport strategy for A4019 Tewkesbury Road that has been established in co-ordination with Gloucestershire County Council. Removal of these measures risk prejudicing planned growth within Cheltenham. These measures must be fully reinstated within the Gloucestershire County Council Scheme.	Yes	Bus priority measures have been considered as part of design development and refinement.	Northern verge of the A4019 has been widened to allow for future bus lane provision from the fire station to Gallagher Junction. Right turn lane from A4019 westbound to North West Cheltenham (Elms Park) Allocated Sit access changed to Bus Only. Entrance to Park & Ride added to the west of Safeguarded Site access junction to match the developer's design.

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335	Persimmon Homes & Bloor Homes	Active Travel	The Gloucestershire County Council Scheme removes the standalone pedestrian and cycle access and associated crossing. This reduces the provision for non-motorised users and is prejudicial to delivery of the Elms Park planning application. The access and crossing must be fully reinstated within the Gloucestershire County Council Scheme.	No	This was combined with the Safeguarded Site access junction to reduce the number of traffic signals along this short length. The Applicant is continuing discussions with the stakeholder and Gloucestershire County Council Planning Team on this matter, and details will be confirmed in the Statement of Common Ground.	This was combined with Safeguarded Site access junction to reduce the number of traffic signals along this short length. The Applicant has continued discussions with the developer and Gloucestershire County Council Planning Team on this matter.
336	Persimmon Homes & Bloor Homes	Design	Banning right turn movements at the Tewkesbury Road / Retail Park junction may prejudice delivery of the business park within Elms Park and would deter potential future occupiers. This must not be included as a future design option.	yes	The Applicant has reviewed the right turn ban option following feedback to the Statutory Consultation, and has decided not to progress with this option.	Right turn ban option is not being progressed, and a right turn lane has been provided within the latest design.
337	Persimmon Homes & Bloor Homes	Traffic	There has been no publication of any of the supporting traffic modelling information. This reduces the ability of PJA to meaningfully comment on the Gloucestershire County Council Scheme design. Traffic modelling information must be provided to justify	N/A	This comment is noted. Traffic modelling details are to be shared with the developer as part of an ongoing engagement, and form part of the Development Consent Order submission.	

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			design variations from the PJA scheme.			
341	UK Health Security Agency - Public Health England	Environment	Preliminary Environmental Information Report notes that a Health Impact Assessment will be produced and reported separately to the Environmental Impact Assessment. The Population and Human Health chapter makes no reference to undertaking a separate HIA or how the findings from a Health Impact Assessment would be linked to the statutory Environmental Impact Assessment and Environmental Statement.	N/A	<p>The requirement to produce a separate Health Impact Assessment has been reviewed and it has been concluded that such a document is not required for the Scheme. Instead of a separate Health Impact Assessment, the human health section of the Population and Human Health chapter has been expanded to:</p> <ul style="list-style-type: none"> Describe health characteristics in greater detail, including consideration of mental health data. Use data analysis to identify and include relevant vulnerable groups within the health baseline. Strengthen approach to consultation and engagement process and outcomes. <p>Summary tables have been included to provide greater clarity in expressing the outcomes of the assessment, and to better</p>	

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					connect health outcomes with impacts.	
342	UK Health Security Agency - Public Health England	Environment	The Preliminary Environmental Information Report identifies the use of the Office for National Statistics ward boundaries from the 2011 census to provide baseline data required by LA112. The report specifies Coombe Hill and Badgeworth wards (Tewkesbury local authority area), with Springbank and Swindon Village (Cheltenham local authority area) and that 2021 census data will be used if available. These wards names appear to have changed and may also involve boundary changes. The Environmental Statement should clearly identify ward boundaries and identify if any changes will affect interpretation of data. The Preliminary Environmental Information Report does not consider local health priorities which have been identified within local Joint Strategic Needs Assessments or Health and Wellbeing Strategies. Any 2011 census data must be	N/A	The baseline data has been verified and updated as appropriate within the Environmental Statement. This includes review of availability of Census 2021 data; ward boundaries and proportionate review of health statistics. It should also be noted that the human health section of Population and Human Health chapter has been expanded, allowing (within its methodology) for the fuller consideration of health priorities and wider health determinants, as expressed within the Joint Strategic Needs Assessment (due to the objectives led approach to Human Impact Assessment).	

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			<p>supplemented with more current health data available from the Joint Strategic Needs Assessments but also from other sources.</p> <p>A more current and broader source of health data must be provided in addition to the 2011 census data. This must include a review of local health priorities, such as the JSNA and Health and wellbeing strategy.</p> <p>In terms of additional sources, we would draw your attention to the following:</p> <ul style="list-style-type: none"> • PHE Fingertips – Mental Health and Wellbeing Joint Strategic Needs Assessments. • Area profiles with various indicators on common mental disorders (including anxiety) and severe mental illness which can be benchmarked with other local areas as well as regional and national data. • PHE Fingertips – Mental Health and Wellbeing Joint Strategic Needs Assessments. 			

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			<ul style="list-style-type: none"> • Area profiles with various indicators on common mental disorders (including anxiety) and severe mental illness which can be benchmarked with other local areas as well as regional and national data. • Office for National Statistics - Wellbeing Indicators. • Range of datasets related to wellbeing available including young people’s wellbeing measures, personal wellbeing estimates and loneliness rates by local authority Advice should also be sought from the local public health team on additional local data The wards included within the baseline assessment should be reviewed to ensure they remain current and health data remains relevant. • Office for National Statistics - Wellbeing Indicators. • Range of datasets related to wellbeing available 			

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			<p>including young people's wellbeing measures, personal wellbeing estimates and loneliness rates by local authority.</p> <ul style="list-style-type: none"> • Advice should also be sought from the local public health team on additional local data. • The wards included within the baseline assessment should be reviewed to ensure they remain current and health data remains relevant. Baseline data should include data on the indices of multiple deprivation (IMD). The baseline data should include mental health and wellbeing data. 			
343	UK Health Security Agency - Public Health England	Environment	The impacts on health and wellbeing and health inequalities of the scheme may have particular effect on vulnerable or sensitive populations, including those that fall within the list of protected characteristics. The Environmental Statement and any Equalities Impact	N/A	The Equality Impact Assessment has been updated post consultation to reflect any scheme changes and to reflect the statutory consultation. The Equality Impact Assessment is a standalone document, which provides an assessment of the likelihood or actual effects of the Scheme on social groups as defined in the Equality Act 2010. These groups known as	

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			Assessment should not be completely separated.		<p>Protected Characteristic Groups are: Age, Disability, Gender Reassignment, Pregnancy and Maternity, Race, Religion, Sex, Sexual Orientation, Marriage, and Civil Partnership.</p> <p>The Equality Impact Assessment has been updated throughout the Scheme, it has been and is used to inform scheme design, so that identified negative impacts can be mitigated as much as possible, and any opportunities for furthering equality aims are taken.</p>	
344	UK Health Security Agency - Public Health England	Environment	It is noted that the Cheltenham West Community Fire Station has not been specifically identified as a sensitive receptor. Access to this emergency responder location is directly from the A4019 and the construction phase will directly impact the operation of this facility.	N/A	This receptor has been reviewed and included within the population and Human Health assessment.	
345	UK Health Security Agency - Public Health England	Environment	The assessments and findings of the Environmental Statement and any Equalities Impact Assessment should be cross referenced between the two documents, particularly to	N/A	The Equality Impact Assessment has been updated post consultation to reflect any scheme changes and to reflect the statutory consultation. Equality Impact Assessment is a	

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			<p>ensure the comprehensive assessment of potential impacts for health and inequalities and where resulting mitigation measures are mutually supportive. The final Environmental Statement must identify additional mitigation measures identified as necessary in connection to vulnerable populations and those within the protected characteristics. The impacts on health and wellbeing of the scheme will have particular effect on vulnerable or disadvantaged populations, including those that fall within the list of protected characteristics. The report does not comprehensively identify a potential list of vulnerable populations, some of which are also within the protected characteristics. The list of vulnerable populations should be reviewed and include data on the Indices of Multiple Deprivation. Guidance is available from the IAIA4. The Environmental Statement should specifically address and report the assessment in</p>		<p>standalone document, which provides an assessment of the likelihood or actual effects of the scheme on social groups as defined in the Equality Act 2010. These groups known as protected Characteristic Groups are Age, Disability, Gender Reassignment, Pregnancy and Maternity, Race, Religion, Sex, Sexual Orientation, Marriage, and Civil Partnership.</p> <p>The Equality Impact Assessment has been updated throughout the Scheme, and has and is used to inform scheme design, so that identified negative impacts can be mitigated as much as possible, and any opportunities for furthering equality aims are taken.</p> <p>This receptor has been reviewed and included within the population and Human Health assessment.</p>	

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			relation to Cheltenham West Community Fire Station.			
347	UK Health Security Agency - Public Health England	Environment	The proposed construction phase results in the need for very clear reporting on the temporal impacts and effects on the local population. In this context “temporary” impacts can extend over long periods, but the Preliminary Environmental Information Report does not comment on how the temporal scope will be defined.	N/A	The items referenced in the response form part of Design Manual for Roads and Bridges LA104 (para. 3.9). They have already been considered within the outputs to date and they have been expressed more explicitly within the Environmental Statement, including a definition of the temporal scope.	
348	UK Health Security Agency - Public Health England	Environment	The Scoping Opinion noted... “Whilst the precise timing of construction activities and phasing of the Proposed Development are not yet known, these have potential to alter the magnitude of impacts. The Environmental Statement should clearly set out the anticipated timing and duration of construction effects and the proposed implementation of mitigation measures, within the context of the overall phasing of the proposals. This should include any relevant ‘advance works’ and works included within the Proposed	N/A	The introductory sections of the Environmental Statement provide details about the construction activities and their phasing. The assessment of construction impacts, and their resultant effects has been informed by this.	

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			Development as mitigation for other environmental effects”.			
349	UK Health Security Agency - Public Health England	Environment	The reporting of temporary effects is not clear. In order for the local community to understand the potential impacts and effects and to assess the magnitude of impacts it is important to understand the temporal nature of any impacts.	N/A	The items referenced in the response form part of Design Manual for Roads and Bridges LA104 (para. 3.9). They have already been considered within the outputs to date and are expressed more explicitly within the Environmental Statement, including a definition of the temporal scope.	
350	UK Health Security Agency - Public Health England	Environment	The reporting of temporary impacts within the Environmental Statement should ensure a consistent, transparent, and accurate approach to the reporting of temporary effects, for example by sub dividing temporary effects into weeks, months, or years.	N/A	The introductory sections of the Environmental Statement provide details about the construction activities and their phasing. The assessment of construction impacts and their resultant effects have been informed by this.	
351	UK Health Security Agency - Public Health England	Environment	The Preliminary Environmental Information Report does not acknowledge the broad definition of health proposed by the World Health Organisation which includes reference to mental health. Mental well-being is fundamental to achieving a healthy, resilient, and thriving	N/A	The Design Manual for Roads and Bridges LA112 methodology has been followed in further developing the baseline information for the Environmental Statement. The baseline data has been verified and updated as appropriate within the Environmental Statement. Mental wellbeing has been incorporated	

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			<p>population. It underpins healthy lifestyles, physical health, educational attainment, employment and productivity, relationships, community safety and cohesion and quality of life. A scheme of this scale and nature has impacts on the over-arching protective factors, which are:</p> <ul style="list-style-type: none"> • Enhancing control. • Increasing resilience and community assets. • Facilitating participation and promoting inclusion. 		<p>within this, as appropriate. The update includes review of availability of Census 2021 data; ward boundaries and proportionate review of health statistics, using datasets that have been referenced within this and other consultation responses (e.g., fingertips data). It should also be noted that the human health section of the Population and Human Health chapter has been expanded, allowing (within its methodology) for the fuller consideration of specific groups, health priorities and wider health determinants, as expressed within the Joint Strategic Needs Assessment (due to the objectives led approach to Human Impact Assessment).</p>	
352	UK Health Security Agency - Public Health England	Environment	<p>There are potential significant impacts on mental health and social community cohesion due to land take and the demolition of private domestic property. The Preliminary Environmental Information Report, however, makes no reference to mental health and wellbeing of the local community. This is a significant omission that needs</p>	N/A	<p>This has been addressed in the Environmental Statement.</p>	

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			to be addressed prior to the submission of the Environmental Statement. This point was raised by Public Health England in the scoping report consultation submission to the Inspectorate.			
354	UK Health Security Agency - Public Health England	Environment	<p>There should be parity between mental and physical health, and any assessment of health impact should include the appreciation of both. A systematic approach to the assessment of the effects on mental health, including suicide, is required.</p> <p>The Mental Well-being Impact Assessment Toolkit could be used as a methodology. The assessment should identify vulnerable populations and provide clear mitigation strategies that are adequately linked to any local services or assets.</p> <p>In addition to the baseline indicators the assessment would benefit from including social cohesion/connectedness, satisfaction with local area and</p>	N/A	<p>The Human Health element of the Environmental Statement has been developed further, in accordance with Design Manual for Roads and Bridges LA112. Subsequent to this and following engagement with UK Health Security Agency representatives in October 2022, the Environmental Statement will be further developed to move from health outcomes (as per Design Manual for Roads and Bridges LA112) to health effects and assignment of a level of significance to these effects, reflecting the latest Planning Inspectorate precedent within the Scoping Opinion for the Scheme and the requirements of the Environmental Impact Assessment Directive. The baseline data has been verified and updated as appropriate within the Environmental Statement. Mental</p>	

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			<p>quality of life indicators owing to their established links to mental health and wellbeing.</p>		<p>wellbeing has been incorporated within this, as appropriate. The update includes review of availability of Census 2021 data; up-to-date ward boundaries and proportionate review of health statistics, using datasets that have been referenced within this and other consultation responses (e.g., fingertips data). It should also be noted that the human health section of the Population and Human Health chapter has been expanded, allowing (within its methodology) for the fuller consideration of specific groups, health priorities and wider health determinants, as expressed within the JSNA (due to the objectives led approach to Health Impact Assessment).</p> <p>The Gloucestershire County Council Prevention, Wellbeing and Communities team has been consulted to discuss health and wellbeing issues and concerns in the study area, as well as explore means of mitigating potential effects that could arise.</p> <p>The Design Manual for Roads and Bridges LA112 methodology for assessment of health includes a flow chart that identifies the circumstances under which</p>	

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					<p>further detailed assessment work may be valuable/required but does not prescribe methodologies. The consultee reference to the MWIA is noted and a review of the tool has shown that the principles of MWIA are replicated within the health assessment in the Environmental Statement. Quality of Life indicators are also incorporated. The Gloucestershire County Council Local Insights data has provided information about the matters raised in the UK Health Security Agency response. Discussion with UK Health Security Agency in October 2022 noted that the data indicates recent spikes in incidence of recorded anxiety and treatment for depression within the local population, but that this has not manifested in increased incidence of suicide. UK Health Security Agency noted that in such circumstances, caution is advised regarding any design response – installation of signs and deterrents may actually be counter-productive in addressing</p>	

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					any issues. This is noted by the Applicant.	
355	UK Health Security Agency - Public Health England	Environment	<p>In terms of sources, we would draw your attention to the following:</p> <ul style="list-style-type: none"> • PHE Fingertips – Mental Health and Wellbeing Joint Strategic Needs Assessment • Area profiles with various indicators on common mental disorders (including anxiety) and severe mental illness which can be benchmarked with other local areas as well as regional and national data • Office for National Statistics - Wellbeing Indicators <p>Range of datasets related to wellbeing available including young people’s wellbeing measures, personal wellbeing estimates and loneliness rates by local authority.</p> <p>When estimating community anxiety and stress in particular, a qualitative assessment may be most appropriate. This may involve conducting resident</p>	N/A	<p>The Design Manual for Roads and Bridges LA112 methodology has been followed in further developing the baseline information for the Environmental Statement. Information from the Joint Strategic Needs Assessment; the Gloucestershire Joint Health and Wellbeing Strategy 2020 - 2030 and Mental Health Needs data from Inform Gloucestershire have been incorporated into the baseline. The baseline also incorporates Census 2011 data; PHE fingertips data and local insight profile data provided by Gloucestershire County Council includes health eating, obesity, physical activity, community needs index data. The baseline data has been verified and updated as appropriate within the Environmental Statement. Mental wellbeing has been incorporated within this, as appropriate. It should also be noted that the human health section of the Population and Human Health chapter has been expanded, allowing (within its</p>	

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			<p>surveys but also information received through public consultations, including community engagement exercises. The MWIA contains key principles that should be demonstrated in a project's community engagement and impact assessment. We would also encourage you to consult with the local authority's public health team who are likely to have Health Intelligence Specialists who will have knowledge about the availability of local data. Robust and meaningful consultation with the local community will be an important mitigation measure, in addition to informing the assessment and subsequent mitigation measures</p>		<p>methodology) for the fuller consideration of specific groups, health priorities and wider health determinants, as expressed within the JSNA (due to the objectives led approach to HIA). Issues have also been discussed with officers within Gloucestershire County Council Prevention Wellbeing and Communities team. The Design Manual for Roads and Bridges LA112 methodology for assessment of health includes a flow chart that identifies the circumstances under which further detailed assessment work may be valuable/required but does not prescribe methodologies. The consultee reference to the MWIA is noted and a review of the tool has shown that the principles of MWIA are replicated within the health assessment in the Environmental Statement. Consultation responses have been reviewed to explore common themes regarding community concerns and issues; and targeted consultation has been undertaken to supplement the baseline data. Gloucestershire County Council</p>	

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					officers have provided Local Insights data profiles of relevant ward boundaries, which has been used in the baseline. Consultation responses on dependent development applications are also being reviewed to explore the nature of concerns, on the basis that these may become deflected concerns associated with this Scheme.	
356	UK Health Security Agency - Public Health England	Environment	The Preliminary Environmental Information Report makes no qualitative assessment on the impact from construction on walkers, cyclists or horse riders using the affected road network. There is no consideration to the number and location of any construction HGVs or construction workforce vehicles using the local road network.	N/A	The impact of construction is not covered by the GG 142 process, which is only focused upon the impact of the completed Scheme. This has been considered as part of the Environmental Statement.	
357	UK Health Security Agency - Public Health England	Environment	A review of the Landscape and Visual Impact Assessment and the Noise chapters did not reveal any assessment in relation to impacts on tranquillity or amenity on public open space, including Public Rights of Way.	N/A	The Landscape and Visual Impact Assessment and Noise chapters follow prescribed methodologies as described within their respective chapters. The Population and Human Health assessment draws the cumulative impacts of changes to	

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					the landscape, visual outlook and noise climate (amongst other factors) in seeking to consider and assess the way in which people will experience the changes arising from the Scheme in a more holistic sense. Tranquillity and amenity have been identified as two such types of cumulative impacts relevant to the assessment of effects on the population and contributing to health determinants and therefore feature in the Population and Human Health assessment (and not necessarily in the contributing assessments).	
358	UK Health Security Agency - Public Health England	Environment	<p>The Walking Cycling and Horse Riding survey results should be used to review the existing allocation of sensitivity and final assessment of significance to each of the affected Public Rights of Way or bridleways.</p> <p>There should be continued local consultation in order to identify any additional enhancements for active travel and physical activity and agree effective mitigation measures.</p>	N/A	These suggestions have been addressed within the Environmental Statement. Consideration has been given to the Institute of Environmental Managers and Assessors GEART Guidelines and their suitability/necessity for application to this Scheme, on the basis that the principal methodology followed is Design Manual for Roads and Bridges.	

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			<p>The Environmental Statement should screen and address any impacts on pedestrians and cyclists including delay, amenity, or safety using the local road network, as outlined within the IEMA GEART Guidelines.</p> <p>The Environmental Statement should address the potential for changes in tranquillity or amenity associated with the construction and operational phases.</p> <p>The Environmental Statement should include details of the Public Rights of Way management plan that identifies specific mitigation and enhancements proposed during the construction and operational phase of the Scheme.</p>			
359	UK Health Security Agency - Public Health England	Environment	The Preliminary Environmental Information Report identifies potential severance from the highway changes both in the construction and operational phase, but findings are highly narrative with no evidence base. The report also identifies	N/A	The Population and Human Health assessment draws on the findings of the noise and air quality assessments (amongst others). Both of these develop modelling that is rooted in traffic modelling for the Scheme. This traffic modelling explores the	

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			the potential for existing traffic to re-route or use rat runs to avoid traffic delays from construction. Little assessment has been made regarding the impact of traffic changes in terms of road safety, air quality, noise, pedestrian/cycle amenity or delay across this wider affected road network.		likely dispersion of traffic across the network under different scenarios and should identify potential changes to 'rat runs', allowing for the resultant impacts on traffic flows, air quality and noise climate to be quantified in accordance with the recognised Design Manual for Roads and Bridges methodologies. The Population and Human Health assessment follows the LA112 methodology to take account of these technical assessments and highlight them as appropriate within the Environmental Statement (ES).	
360	UK Health Security Agency - Public Health England	Environment	The Preliminary Environmental Information Report notes that the introduction of free-flowing traffic along main access routes could give rise to increased risk of damage to physical health to vulnerable road users, particularly cyclists and new drivers. In particular in the area near All Saints Academy, where a negative health outcome is predicted. No identifiable mitigation is proposed within the Preliminary Environmental Information Report.	N/A	The Environmental Impact Assessment process has identified potential impacts, effects and mitigation. These are reported fully within the Environmental Statement. Regarding impacts to the All Saints Academy, this is located at the western fringe of Cheltenham, approximately 180 m from the Development Consent Order Limits. Whilst key access routes to this facility fall outside the Development Consent Order Limits for the Scheme, construction activities	

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					on the A4019 are assessed to effect access through to this location on a temporary basis. The assessment of this in the EIA has concluded a slight adverse effect to the All Saints Academy during construction of the Scheme, which is not significant.	
361	UK Health Security Agency - Public Health England	Environment	Determination of Sensitivity notes that all 14 of the residential properties at Withybridge Gardens, plus two properties adjacent to the A4019 and three properties at Sheldon Nurseries would be the subject of demolition works to allow for the construction of the Scheme. This receptor cluster is noted to be of medium sensitivity to change. This level of sensitivity is under-estimated given the impact will be forced relation of the small community both in terms of land use and human health within LA 112.	N/A	This has been reviewed, and additional information gathered through the consultation has been referenced in the Environmental Statement.	
362	UK Health Security Agency - Public	Environment	There are also many instances of inconstancy within the determination of sensitivity for the same population or receptor, for example All	N/A	This will be reviewed and addressed in the Environmental Statement.	

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	Health England		<p>Saints Academy sensitivity is described as medium and high. Additionally the gypsy and traveller site has been determined to be medium sensitivity, yet given the vulnerability of this population and that they fall within a protected characteristic sensitivity of high or very high should be assigned in accordance with LA 112 (Human Health and Land Use sensitivity table)</p> <p>The determination of sensitive should be reviewed to ensure a consistent approach, reflects insights from stakeholder consultation and adequately reflects the true sensitivity of each population group or receptor. The determination of magnitude of impact and significance should also be reviewed in light of the potential change in sensitivity.</p>			
365	UK Health Security Agency - Public Health England	Environment	It is noted that the Population and Human Health chapter of the Preliminary Environmental Information Report is drafted in accordance with LA 112 and as such no assessment of	N/A	The Human Health element of the Environmental Statement has been developed further, in accordance with Design Manual for Roads and Bridges LA 112. Subsequent to this and following	

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			significance is provided for human health. This does not conform to the requirements of the Equality Impact Assessment Regulations and as such an assessment of significance will be required to form part of the Environmental Statement.		engagement with UK Health Security Agency representatives in October 2022, the Environmental Statement will be further developed to move from health outcomes (as per Design Manual for Roads and Bridges LA 112) to health effects and assignment of a level of significance to these effects, reflecting the latest Planning Inspectorate precedent within the Scoping Opinion for the Scheme and the requirements of the Environmental Impact Assessment Directive. Legal advice has confirmed in October 2022 that this Planning Inspectorate published view has changed the precedent (altering the legal advice previously received in Summer 2022).	
366	UK Health Security Agency - Public Health England	Environment	The Preliminary Environmental Information Report does report on effects on human health (positive, negative or neutral) and identifies the potential impacts from reduced amenity, changes to air quality and noise. The report provides little evidence-based justification for the findings and does not draw upon the findings from other	N/A	The preliminary assessment findings are based on the content of the contributing topic assessments. However, the evidence has been expressed with greater clarity within the Environmental Statement, commensurate with the greater degree of certainty and quantitative evidence that	

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			chapters within the Preliminary Environmental Information Report, including noise or air quality chapters.		underpin these within the Environment Statement.	
367	UK Health Security Agency - Public Health England	Environment	<p>The final Environmental Statement must provide an assessment of significance for those health determinants scoped into the population and human health chapter.</p> <p>The population and human health assessment should draw upon the findings from other relevant chapters, including air quality and noise.</p> <p>As LA112 does not define an approach to the assessment of significance for human health it is strongly advise that any proposed approach is agreed with Office for Health Improvement and Disparities/UK Health Security Agency and the local public health team prior to the submission of the Environmental Statement.</p>	N/A	<p>The Human Health element of the Environmental Statement has been developed further, in accordance with LA 112. Design Manual for Roads and Bridges LA 112 does not require significance to be assigned to human health outcomes and no methodology is provided for this aspect of the chapter. However, significance has been assigned to the Population aspects of the chapter. Instead of a separate Human Impact Assessment, the human health section of the Population and Human Health chapter has been expanded to:</p> <ul style="list-style-type: none"> Describe health characteristics in greater detail, including consideration of mental health data. Use data analysis to identify and include relevant vulnerable groups within the health baseline. 	

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					<ul style="list-style-type: none"> Strengthen approach to consultation and engagement process and outcomes. <p>Summary tables have been included to provide greater clarity in expressing the outcomes of the assessment, and to better connect health outcomes with impacts.</p>	
368	UK Health Security Agency - Public Health England	Environment	Very little detail is provided within the Preliminary Environmental Information Report in relation to embedded or additional proposed mitigation. Some paragraphs list mitigation that should be included but lacks any detail or confirmation that these mitigation measures will be put into place.	N/A	Mitigation measures have been set out in more detail in the Environmental Statement.	
369	UK Health Security Agency - Public Health England	Environment	<p>UK Health Security Agency recommends that the following documents are added as relevant guidance to the planning policy and topic legislative context:</p> <ul style="list-style-type: none"> World Health Organisation (2018) Environmental Noise Guidelines for the European Region. 	N/A	These documents have been considered during production of the Environmental Statement.	

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			<ul style="list-style-type: none"> Department for Environment, Food and Rural Affairs (2014) Environmental Noise: Valuing impacts on sleep disturbance, annoyance, hypertension, productivity and quiet. 			
370	UK Health Security Agency - Public Health England	Environment	The Applicant has followed the Design Manual for roads and Bridges LA 111 method for establishing significance of effects. UK Health Security Agency welcomes the Applicant's consideration of certain contextual factors, such as the absolute exposure, in the determination of significance. UK Health Security Agency encourages consideration of further contextual factors in the final Environmental Statement. It is important that the consideration of these additional factors follows a clear and transparent methodology, which ideally should be agreed with local stakeholders.	N/A	Further contextual factors have been included in the Environmental Statement.	
371	UK Health Security	Environment	There are areas of land near the Scheme which have been	N/A	A more detailed assessment of cumulative effects has been	

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	Agency - Public Health England		earmarked for almost 9,000 new properties to be developed. The Preliminary Environmental Information Report states that this 'Scheme Dependent Development' has been considered in the assessment of cumulative operational noise effects. However, it is unclear whether the Applicant has considered the 9,000 new properties as potential noise sensitive receptors when considering the long-term impacts of operational noise from the Scheme and the assessment of effects in the Environmental Statement. UK Health Security Agency would welcome clarity on this point.		included in the Environmental Statement.	
372	UK Health Security Agency - Public Health England	Environment	UK Health Security Agency believes that Nationally Significant Infrastructure Projects should not only limit significant adverse effects, but also explore opportunities to improve the health and quality of life of local communities already adversely affected by noise, and to reduce inequalities. This is particularly applicable to areas with very	N/A	This has been considered as part of the Environmental Statement assessment, with regards to effects to Noise Important Areas.	

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			<p>high noise exposure, such as Noise Important Areas. Several Noise Important Areas were identified within the study area, and UK Health Security Agency welcomes the Applicant's commitment to noise mitigation in these areas, where possible to do so. However it appears that some Noise Sensitive Receptors in or near a Noise Important Areas, for example along Stoke Road, will experience an increase in noise exposure, but 'mitigating these minor increases where noise levels already exceed the Significant Observed Adverse Effect Level would be difficult due to property access requirements'. UK Health Security Agency encourages the Applicant to explore every opportunity for reducing the existing noise exposure in these areas, together with complimentary mitigation measures that can enhance health and quality of life as discussed in the Mitigation measures section in this response.</p>			

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373	UK Health Security Agency - Public Health England	Environment	Regarding the assessment methodology for construction noise impacts, it is stated that “Minor’ magnitudes of impact are considered to represent the threshold of perceptibility’. Given the chosen assessment methodology for construction noise, UK Health Security Agency encourages the Applicant to clarify that construction noise is likely to be clearly perceptible (audible) even in areas exposed to Lowest Observed Adverse Effect Level.	N/A	These have been included in the Environmental Statement.	
374	UK Health Security Agency - Public Health England	Environment	UK Health Security Agency notes that a baseline sound survey was carried out at four locations (short term) and one location long term. The long-term survey results should be used to test the assumption that the proportionate traffic flow volumes within the study area between daytime and night-time, and different days of the week, can be considered as typical (within the context of Design Manual for Roads and Bridges terminology). UK Health Security Agency recommends	N/A	More commentary on the baseline noise levels has been included in the Environmental Statement.	

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			that baseline sound surveys combine traditional averaged noise levels with a qualitative characterisation of the sound environment, including any particularly valued characteristics (for example, tranquillity) and the types of sources contributing to it.			
375	UK Health Security Agency - Public Health England	Environment	The Applicant states that 'It is expected that most receptors within the study area have day-time baseline noise levels in the range 40-45 dB LA10,18h. Receptors which are close to the motorway have baseline noise levels up to 75 dB LA10,18h. The measurements taken on the A4019 Tewkesbury Road show that noise in the front gardens of some of these properties already exceed 80dB'. It is unclear as to whether the Applicant came to these conclusions using modelled road-traffic noise data or the sound survey results.	N/A	This has been made clearer in the Environmental Statement.	
376	UK Health Security Agency -	Environment	A variety of metrics can be used to describe the sound environment with and without	N/A	The Design Manual for Roads and Bridges guidance that we are working to does not include	

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	Public Health England		the Scheme – for example, levels averaged over finer time periods, background noise levels expressed as percentiles, and number of event metrics (e.g. N65 day, N60 night). This suite of metrics could be used to inform judgements of significance. There is emerging evidence that intermittency metrics can have an additional predictive value in addition to traditional long-term time-averaged metrics for road traffic noise.		these metrics and the noise modelling software cannot predict them. However, the Environmental Statement includes an assessment of night time noise levels.	
377	UK Health Security Agency - Public Health England	Environment	The Applicant has chosen to use the default values suggested in Design Manual for Roads and Bridges LA 111. UK Health Security Agency recommends that the Applicant expresses its chosen Lowest Observed Adverse Effect Levels and Significant Observed Adverse Effect Levels into health terms, referring to the evidence in the World Health Organisation 2018 guidelines (1) for this purpose. For example, stating what the expected percentage of the population highly	N/A	The Lowest Observed Adverse Effect Level and Significant Observed Adverse Effect Level has remained in line with Design Manual for Roads and Bridges. Percentages have not been stated.	

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			<p>annoyed at the chosen day-time Lowest Observed Adverse Effect Levels and Significant Observed Adverse Effect Levels would be for operational noise (making conversions from LA10,18h to Lden), as well as the percentage of the population highly sleep disturbed due to night-time noise exposure.</p>			
378	UK Health Security Agency - Public Health England	Environment	<p>The paragraph on assessment of effects in the Preliminary Environmental Information Report states that ‘The predicted changes in noise have been reviewed alongside the absolute noise levels at the receptors and the overall site context, to arrive at a conclusion on the potential significance of the predicted changes in noise.’ However the data only takes into account absolute noise levels’. UK Health Security Agency recommends further consideration of “overall site context” to arrive at conclusions on potential significance. UK Health Security Agency also recommends that the use of ></p>	N/A	<p>The assessment has taken into account the site context when determining significance and the potential for mitigation.</p>	

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			and < signs is checked for accuracy.			
379	UK Health Security Agency - Public Health England	Design	It is unclear from the Preliminary Environmental Information Report if temporary access to the gypsy and traveller's site is to be provided during the construction phase, although it appears that alternative access will be provided at some point.	N/A	Permanent access is being re-provided as part of the Scheme. Temporary access will also be provided during the construction stage.	Permanent access is being re-provided as part of the Scheme. Temporary access will also be provided during the construction stage.
380	UK Health Security Agency - Public Health England	Environment	UK Health Security Agency recommends that the Applicant distinguishes between increases and decreases in modelled road-traffic noise as a result of the Scheme in the noise impacts assessment, and the noise contour mapping of change. For example, one of the figures has one colour grouping to represent changes in noise, ranging from -3 dB (reduction) to +3 dB (increase). This large range captures an effect equivalent to a fourfold change in traffic volume and makes up a large proportion of the study area. UK Health Security Agency strongly recommends that	N/A	The number grouping used is in line with Design Manual for Roads and Bridges where the long term changes between -3dB and 3dB are considered negligible (when below the Significant Observed Adverse Effect Level). However, the display of the figures has been reviewed, particularly where some contour figures do not show properties that exceed the Significant Observed Adverse Effect Level and are predicted a 1dB increase in noise.	

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			areas experiencing an increase in noise exposure are separated from areas experiencing a decrease, in the interest of transparency.			
382	UK Health Security Agency - Public Health England	Environment	Non-residential receptors appear to be assessed as one category with no apparent consideration of their specific sensitivities in the Noise and Vibration chapter of the Preliminary Environmental Information Report. For example, the educational facilities in the area are likely to require very specific consideration of the existing and future outdoor and indoor noise environment, and the impacts on the health and quality of life of their occupants. UK Health Security Agency recommends that a more bespoke assessment is carried out for non-residential noise sensitive receptors, and one-to-one discussions are held with those receptors deemed as highest risk from increased road-traffic noise exposure as a result of the scheme (both in terms of their existing and future external	N/A	The Environmental Statement names the non-residential receptors with potential noise impacts and includes bespoke assessment where necessary.	

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			and internal noise exposure, and appropriate mitigation measures).			
383	UK Health Security Agency - Public Health England	Environment	UK Health Security Agency notes that a quantitative assessment of construction noise impacts has not been undertaken at this stage but that the Applicant plans to include one in the Environmental Statement. UK Health Security Agency would welcome a quantitative assessment of construction noise impacts, including details of the construction traffic, diversion routes, construction schedule, construction methodology and plant requirements, when confirmed.	N/A	The construction assessment is presented in more detail in the Environmental Statement,	
384	UK Health Security Agency - Public Health England	Environment	UK Health Security Agency recommends that the Environmental Statement documentation gives a much clearer acknowledgement of the strengthening body of evidence that road traffic noise is associated with adverse health effects, including annoyance, sleep disturbance, and cardiovascular and metabolic health outcomes, in	N/A	This additional work will be considered for inclusion in the Environmental Statement.	

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			<p>both the Noise and Vibration and Population and Human Health chapters of the Preliminary Environmental Information Report, including reference to the expected health impacts as a result of the scheme. UK Health Security Agency encourages the Applicant to carry out a quantitative assessment of the expected health impacts of the Scheme, by quantifying the change in the number of people that will be chronically highly annoyed and sleep disturbed, and any predicted additional (or a reduction of) cases of cardiovascular disease, using established methodologies.</p> <p>The scientific evidence suggests that areas valued for their tranquillity, acoustic character, and/or quiet areas can have a direct and beneficial health effect and can help restore or compensate for adverse health effects attributed to noise within the residential environment. Therefore, UK Health Security Agency requests clarity in</p>			

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			<p>whether any such areas were found within the study area, and if so, how this was considered in the assessment of noise impacts. UK Health Security Agency recommends that the Applicant liaises with national and local stakeholders (such as Natural England, local authorities and communities) to identify any such areas and agree a strategy on how to assess significant effects and design effective mitigation to protect those areas. UK Health Security Agency welcomes the assessment of the impacts of the Scheme on amenity and enjoyment of outdoor environments from a noise perspective within the Population and Human Health Chapter (‘amenity and enjoyment of the environment – collectively considers the experience of impacts on air quality, noise and landscape amenity’). There is emerging evidence to suggest that the use of green spaces, can decrease as a result of increased noise levels. The Applicant may also wish to</p>			

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			consider the potential impacts of the Scheme on private and public amenity spaces, referring to specific types and places (e.g., Public Rights of Way, parks), within the Noise and Vibration chapter.			
385	UK Health Security Agency - Public Health England	Environment	The main mitigation measures proposed for operational noise include low-noise road surfacing on the M5 and reflective or absorptive noise barriers along the A4019. UK Health Security Agency recommends that the Applicant considers a broader set of mitigation measures. Whilst the primary focus should be at reducing noise at source, there are many other mitigation measures that can be considered, some of which involve addressing the so-called non-acoustic factors that moderate the causal relationship between noise and health. Potential mitigation measures not mentioned in the Preliminary Environmental Information Report with respect to operational noise include speed restrictions, insulation of the building	N/A	The operational noise mitigation measures include low noise surfacing, environmental noise barriers and funding towards traffic calming measures on Stoke Road.	

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			envelope, access to quiet (either as a quiet side for dwellings or access to good quality local tranquil spaces), and education and communication.			
387	UK Health Security Agency - Public Health England	Environment	<p>The current Preliminary Environmental Information Report requires substantial work in order to provide the basis for a suitable and sufficient assessment of effects on population and human health within the final Environmental Statement.</p> <p>It is strongly recommended that the assessment team meet with Office for Health Improvement and Disparities and the local public health team to discuss the assessment methodology, assessment of significance, mitigation and the format of the final population and human health chapter.</p> <p>If you require any clarification on the above points or wish to discuss any particular issues please do not hesitate to contact us.</p>	N/A	<p>The Human Health element of the Environmental Statement has been developed further, in accordance with LA 112. Design Manual for Roads and Bridges LA112 does not require significance to be assigned to human health outcomes and no methodology is provided for this aspect of the chapter. However, significance is to be assigned to the Population aspects of the chapter. Instead of a separate Human Impact Assessment, the human health section of the Population and Human Health chapter will be expanded to:</p> <ul style="list-style-type: none"> Describe health characteristics in greater detail, including consideration of mental health data. Use data analysis to identify and include relevant vulnerable groups within the health baseline. 	

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
					<ul style="list-style-type: none"> Strengthen approach to consultation and engagement process and outcomes. <p>Summary tables are included to provide greater clarity in expressing the outcomes of the assessment, and to better connect health outcomes with impacts.</p>	
388	Robert Hitchins Limited	Environment	Relocate proposed pond and access track shown to the Southwest of the junction to the existing National Highways land where presently the northbound on circular slip resides.	No	<p>This suggestion would not be feasible without significant implications for design risk, constructability, maintenance, cost, and water quality. It is therefore recommended the basin location is retained as per the current proposal.</p>	<p>This suggestion would not be feasible without significant implications for design risk, constructability, maintenance, cost, and water quality. It is therefore recommended the basin location is retained as per the current proposal.</p>
389	Robert Hitchins Limited	Environment	Along the route where the present proposed pond access track is located, plant a tree belt to assist in visual amenity and air/noise pollution.	Yes	<p>This request has been included in the landscape design.</p>	<p>This request has been included in the landscape design.</p>
390	Robert Hitchins Limited	Environment	Robert Hitchins Limited would seek betterment and further details should be provided, regarding land that could be affected by minor changes in the flood risk. Robert Hitchins Limited land to the Southwest of the junction should not be affected by any additional flood	N/A	<p>The Scheme is not designed to be a flood alleviation project; however, it does intend to avoid any significant adverse impact on flood risk.</p> <p>The impacts of the Scheme are described in the Flood Risk Assessment report. The land to the southwest of Junction 10 is</p>	

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			zone change as per the recent model shared by Robert Hitchins Limited to Gloucestershire County Council. Confirmation of the previously considered betterment to the flood zone in Robert Hitchins Limited land to the northeast of the junction to be confirmed.		also predicted to receive considerable benefit in terms of flood risk, with a reduction in both frequency, depth, and extent of flooding. The modelling does predict that there would be an increase in the duration of the residual flooding (albeit over smaller areas and to lesser depths than would occur today).	
391	Persimmon Homes & Bloor Homes	General	Timing Support of the Gloucestershire County Council Scheme is conditional on Bloor Homes and Persimmon Homes being able to progress the Elms Park development in a timely manner. To resolve this objection it will be necessary to agree to a construction phasing plan for the Gloucestershire County Council Scheme which has regard to the Elms Park construction programme.	N/A	This has been noted, and the Applicant has continued discussions with the developer on this matter.	
392	Swindon Parish Council	Environment	A significant increase in noise, which given the nearby residential properties (that should be considered sensitive receptors) would likely be unacceptable. The Preliminary Environmental Information	Yes	The right turn ban option has been reviewed following feedback to the Statutory Consultation and it was not to progress with this option. The Environmental Statement noise assessment has been carried out	

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			Report information shows that these receptors have not been considered. It is also noted that the noise modelling shows no increase in noise levels along Hayden Road, suggesting the topic has not been considered properly.		using the most up to date road traffic data, which includes traffic on Hayden Road.	
393	Swindon Parish Council	Environment	A significant decrease in air quality, which given the nearby residential properties (that should be considered sensitive receptors) would likely be unacceptable. The information provided in the Preliminary Environmental Information Report demonstrates this impact has not been considered as part of the scheme.	N/A	Air Quality levels are modelled to provide information on the concentrations of pollutants experienced at representative receptors that are present within the affected road network, as per the guidance set out in LA 105.	
394	Uckington Parish Council	Environment	The Parish Council is particularly concerned at the potential loss of countryside, loss of agriculture and horticulture for which Uckington is traditionally involved and for the loss of Grades 1 and 2 agricultural land. In this respect the agricultural land classification survey undertaken ignores the Natural England ALC006 Map	N/A	The impacts to agricultural land likely to be affected as part of the final design have been considered within the Environmental Statement. Initial surveys were undertaken along the route of the West Cheltenham Link Road, and additional surveys have also been completed for the agricultural land to the north of the A4019 and land surrounding	

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			showing the land at the northern section of the proposed link road as Grade 2 (i.e. Very Good) and does not appear to have surveyed the land at Junction 10 itself (also Grade 2). A large stretch of land to the North of the A4019 is Grade 1 (i.e. Excellent) and this also has been totally ignored.		Junction 10. Existing information available for adjacent schemes has been reviewed and considered where available.	
395	Uckington Parish Council	Environment	With regard to cultural heritage, the village of Uckington boasts a 13th/14th century moat that is recognised by English Heritage as a Scheduled Monument (No. 1016835). It is one of only a few moats nationally that remains filled with water throughout its quarter of a mile overall length. In the last 15 years, the present owners have brought the condition of the moat back from the 'at risk' register to what we see today. On the three-acre island with the moat surrounding them are a collection of Grade 2 listed buildings including a late 17th century tithe barn, a pair of lodges, and a cast-iron bridge	Yes	The heritage features identified has been considered within the Environmental Statement. The junction arrangement has been reviewed to reduce the impacts on the Scheduled Monument. The alternative option of widening to the North would require acquisition of part or all the of the residential properties on the northern side of the A4019.	The new link proposed between Cooks Lane and Moat Lane, and the creation of passing bays along Moat Lane has been removed from the design. The Moat Lane / A4019 junction has been realigned so that the Moat House buildings are no longer in line of sight of the Moat Lane / A4019 junction.

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			inscribed 'Cast at Coalbrookdale 1851', a substantial Victorian Coach House and the prize, a beautiful Georgian residence whose origins date back to the 16th century. Set in overall grounds of five acres the historic site enjoys a protected setting of a one and a half acre field to its east, a field bordered by the River Chelt to the rear and a bridleway field known as The Langett to the west. In front of the property are fields used for grazing that protect the overall setting of this beautiful piece of Gloucestershire's history from the Tewkesbury Road / A4019.			
398	The Environment Agency	Environment	As highlighted both embedded mitigations, and any essential (additional) mitigation will need to be based on a sound evidence base. This would take the form of a detailed hydraulic model to support the design works.	N/A	The Scheme modelling report and hydraulic model was issued to the Environment Agency (March 2022). These items support the information presented in the Environmental Statement, and the Flood Risk Assessment (provided as an appendix to the Environmental Statement).	

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401	The Environment Agency	Environment	With regards to road drainage and water, if the sequential test is deemed to have been passed then, as the link road will cross all flood zone designations, it is felt that both parts of the exception test would also need to be passed.	N/A	Agreed that both parts of the exception test need to be met, being wider sustainability benefits to the community; and the Scheme being safe over its lifetime. The Flood Risk Assessment covers the latter point. The first point (wider benefits to the community) is described within the Scheme objectives and the details on the purpose of the Scheme in the Environmental Statement.	
402	The Environment Agency	Environment	With regards to road drainage and water, if part one of the test is felt to outweigh the presence of a vulnerability use not defined as essential infrastructure which is partially located in Flood Zone 3b, as this would be unavoidable as a result of the sequential test decision, then the exception test must be passed.	N/A	If the Scheme, or part of it thereof, is reclassified as being other than essential infrastructure then its presence in Flood Zone 3b is not compatible with that vulnerability. Then, by virtue of its requirement as part of the overall Scheme the Applicant agrees that the Exception Test would still need to be applied, and passed. The Flood Risk Assessment considers the Scheme in its entirety and not as separate components – there are no standalone elements. The Flood Risk Assessment applies the Exception Test to demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users,	

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					without increasing flood risk elsewhere, and in fact reduces flood risk overall.	
404	Robert Hitchins Limited	Design	Northwest field access, presently shown to be diverted and within land to be retained by Robert Hitchins Limited. Our preference is that the diverted access to the Travellers site to reside in National Highways land. Furthermore, Robert Hitchins Limited is concerned that by altering this access route are Gloucestershire County Council legitimising their use over and above agricultural usage, taking into consideration that the Travellers site does not have planning permission, please confirm. Separately safe and suitable access to Robert Hitchins Limited land which is defined as "Land safeguarded for development" should be adequately provided.	N/A	The issues on land usage are noted. The Scheme needs to provide an alternative access to the land as the current access is being removed. The Applicant is continuing to work with the landowners and relevant stakeholders to find a solution.	
405	The Environment Agency	Environment	Managing flood risk should be based on the hierarchy set out within Preliminary Environmental Information Report, with the emphasis	N/A	The approach taken has been to avoid areas of predicted flooding where technically possible. Through the embedded mitigation, built by default into	

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			being on Avoidance/Prevention through appropriate design and location rather than relying on significant mitigation or other interventional measures to provide a truly sustainable scheme.		the Scheme, detrimental impacts to flood risk are avoided. As the inclusion of flood culverts and flood storage/attenuation was part of the initial design, these control measures in effect prevent adverse effects on flood risk.	
407	Stoke Orchard and Tredington Parish Council	Traffic	<p>In order to get some clarity of the impact of the developments and the scheme the Parish is asking for some further details.</p> <p>(i) What is the forecast peak hour and 24hr trip attraction and generation assumed for the new developments unlocked by the scheme and those in the Bishops Cleeve Area</p> <p>(ii) In your assignments what is the assigned peak hour and 24hr loading of these new trips to/from the new developments through the Parish and what is the change from recent surveys (the latest mode split to which we have easy access is 2016 but any later will be helpful).</p> <p>(iii) What is the impact of the changes in capacity and routing potential brought about</p>	N/A	<p>Traffic modelling has been undertaken and included in the Transport Assessment which forms part of the Development Consent Order application. Within the Transport Assessment (Appendix B) there are flow difference plots which show the changes in flow predicted by the Gloucestershire Countywide Traffic Model as a result of the Scheme in isolation, and the Scheme with the associated unlocked development. Additionally, as part of ongoing engagement, a separate technical note has been prepared and issued to the Stoke Orchard Parish Council which has provided the required information.</p>	

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			by Junction 10 diverting trips through the Parish; I refer here to the diversion of existing trips because of the new routes (off N bound and on S bound) available through the junction.'			
412	Uckington Parish Council	Environment	With the introduction of a 4-way junction at M5 Junction 10, it is proposed that the A4019 be dramatically widened, destroying homes and a business, and bringing this highway closer to the Moated Site. The introduction of traffic lights, street lighting and all of the infrastructure along with increased air and noise pollution that comes with such a major development would completely destroy the unique setting that the site currently enjoys. Further, no consideration appears to have been given to the impacts of the proposed new road between Cooks Lane and Moat Lane. Accordingly, the Parish Council find it difficult to accept the conclusion that "the operation of the Scheme is not expected to alter the setting of the Scheduled Monument or listed buildings at Moat House	Yes	The junction arrangement to has been reviewed to reduce the impacts on the Scheduled Monument. The alternative option of widening to the North would require acquisition of part or all the of the residential properties on the northern side of the A4019.	The new link proposed between Cooks Lane and Moat Lane, and the creation of passing bays along Moat Lane has been removed from the design. The Moat Lane / A4019 junction has been realigned so that the Moat House buildings are no longer in line of sight of the Moat Lane / A4019 junction.

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			in a way that affects their significance, either individually or as a group”			
414	Swindon Parish Council	Traffic	Given the lack of traffic modelling and assessment information provided in the consultation, it has been impossible for us to assess whether the proposed scheme (specifically the junctions) have sufficient capacity to support the longer-term growth in North West Cheltenham. We are concerned the design only considers development set out in the current Joint Core Strategy period that ends in 2031 (less than 9 years’ time). Beyond this period, North West Cheltenham is likely to see continued development, both in terms of housing and commercial properties, specifically the safeguarded area.	N/A	Traffic modelling and associated assumptions have been included as part of the Development Consent Order application submission. The Traffic Forecasting Report includes the full listing of all developments considered and those included in the traffic model in accordance to the certainty levels defined in the relevant Department for Transport Guidance at the time of developing the traffic model. The phasing of developments has been taken into account under different forecast years with the latest year being 2042 when all development sites are expected to be completed. The Transport Forecasting Report together with Transport Assessment include information on performance of the Scheme.	
415	Swindon Parish Council	Traffic	We would like to understand what consideration has been given to this, and what level of development the Scheme could support beyond that immediately proposed within	N/A	Traffic modelling and associated assumptions have been made as part of the Development Consent Order application, which provides information on journey times along the key corridors including	

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			the Joint Core Strategy, while still providing acceptable journey reliability and times. It is essential the Scheme considers this, as the development proposed in the Joint Core Strategy will make future upgrades to junctions highly undesirable due to the development of currently available land adjacent to the A4019 corridor.		A4019. The Traffic Forecasting Report includes the full listing of all developments considered and those included in the traffic model in accordance to the certainty levels defined in the relevant Department for Transport Guidance at the time of developing the traffic model. The phasing of developments has been taken into account under different forecast years with the latest year being 2042 when all development sites are expected to be completed. The Transport Forecasting Report together with Transport Assessment include information on performance of the Scheme.	
416	Swindon Parish Council	Design	We are concerned the Scheme does not include the junction between the A4019 and the road north to Stoke Orchard, located adjacent to the Gloucester Old Spot, noting this junction is within the scheme's Red Line boundary. This junction needs to be enhanced as the current wait time to onto the A4019 from the direction of Stoke Orchard can exceed several minutes. Additionally, the dedicated	No	The changes to Junction 10 are considered to indirectly improve the safety issues at the Gloucester Old Spot Junction. The Scheme is not planning any improvements to increase the capacity of the junction. Whilst the traffic modelling shows there would be an increase in traffic using this junction, the increase did not exceed the available capacity. In addition, making any junction capacity improvements as this would further attract traffic	The changes to Junction 10 are considered to indirectly improve the safety issues at the Gloucester Old Spot Junction. The Scheme is not planning any improvements to increase the capacity of the junction. Whilst the traffic modelling shows there would be an increase in traffic using this junction, the increase did not exceed the available capacity. In addition, making any junction capacity improvements as this would further attract traffic onto

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			right turn lane should be extended, as this is often full leading to congestion for traffic travelling West on the A4019. This should be considered considering the approved housing development at Coombe Hill, and further south on the A38, at Twigworth.		onto Stoke Road, which is not desirable by residents and the Stoke Orchard Parish Council.	Stoke Road, which is not desirable by residents and the Stoke Orchard Parish Council.
417	Swindon Parish Council	Design	Regarding Withybridge Lane, we would support closing to through traffic at the northern end of Withybridge Lane, but still providing access for cyclist and pedestrians. We would also suggest that the ability to open Withybridge Lane to through traffic temporarily should be retained, to provide a sensible alternative route, in the event the link road is unavailable (e.g., emergencies, or essential roadworks).	Yes	Following feedback from the statutory consultation Withybridge Lane is to be kept open for traffic with Withybridge Lane/A4019 junction having a left in and left out turn.	Withybridge Lane is to be kept open for traffic with Withybridge Lane/A4019 junction having a left in and left out turn.
418	Swindon Parish Council	Traffic	With reference to the West Cheltenham Link Road, we propose that a suitable corridor is maintained to upgrade the link road to West Cheltenham to dual carriageway in the future at minimal cost. This area of Cheltenham is likely to	N/A	The forecast traffic flows for the design year of 2042 are significantly below the lower threshold of that considered for provision of a dual carriageway. Therefore, the need to allow provisions for future widening with associated economic, land	

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			see significant development post 2031.		take and environmental impacts would not be justified.	
419 a	Swindon Parish Council	Active travel	There should be provision for pedestrians to safely cross A4019 at the existing Withybridge Lane, noting that it's an important connection between the bridal way north of the A4019 to Elmstone Hardwick and the pathways along the River Chelt, that are accessed via Withybridge Lane.	Yes	<p>An underpass has been included beneath the A4019 to the east of M5 Junction 10 to provide a Public Right of Way route from the bridleway AUC1 to Withybridge Lane.</p> <p>The underpass is intended to be shared use with a segregated cycle and pedestrian crossings are provided ,as part of the signal-controlled A4019/West Cheltenham Link Road junction. A segregated footway and cycleway are provided from the crossing point to Withybridge Lane.</p>	<p>An underpass has been included beneath the A4019 to the east of M5 Junction 10 to provide a Public Right of Way route from the bridleway AUC1 to Withybridge Lane.</p> <p>The underpass is intended to be shared use with a segregated cycle and pedestrian crossings are provided ,as part of the signal-controlled A4019/West Cheltenham Link Road junction. A segregated footway and cycleway are provided from the crossing point to Withybridge Lane.</p>
419 b	Swindon Parish Council	Design	<p>Gallagher Retail Park West End Junction. The removal of right turns from A4019 into the side roads in the 2031 scenario is highly undesirable. This is the main access route from the M5 for 1000 approx. existing homes, located in North West Cheltenham.</p> <p>If the right hand turning is removed, the nearest access from the M5 to these houses would be:</p>	Yes	Following feedback from the statutory consultation the Scheme is no longer including the removal of right turns at Gallagher Retail Park junction.	Following feedback from the statutory consultation the Scheme is no longer including the removal of right turns at Gallagher Retail Park junction.

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			<p>a. Via the junction between the A4019 and Hayden Road. This route would add 0.8km to a typical journey from the M5 to this area. The route includes three minor junctions in addition to the junction with the A4019, a 3-way mini roundabout, a 4-way mini round about, and a T junction as well as disabled parking on the road. The route provides direct access to houses, with some properties being less than 3m from the road curb.</p> <p>b. The next nearest would be via the new link-road which would add on average 3.5km to a journey from the M5 to this area. This involves utilising portions of the B4019 that are bendy and narrow as it climbs over Holmesdale.</p> <p>Given that (b) represents a significant increase in journey time and length compared to (a), without traffic modelling, it is reasonable to assume that most traffic would use route (a). This would result in:</p> <ol style="list-style-type: none"> 1. A significant increase of traffic using the junction 			

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			<p>between Hayden Road and the A4019. This would likely result in congestion on the A4019 to the new Gallagher Retail Park junction due to tailbacks, reducing its capacity and increasing journey times, while reducing journey reliability.</p> <p>2. A significant increase of traffic using Hayden Road. The 3-way mini roundabout, with the junction between Hayden Road and Village Road is of particular concern, noting that during peak</p>			
421	The Environment Agency	Environment	<p>Additionally, the principles set out in the Preliminary Environmental Information Report are also crucial in minimising impacts during the construction phase and need to be considered fully prior to final development boundaries being set.</p>	N/A	<p>The Buildability Report provides some further information on how this Scheme might be constructed. Requirements to the Contractor have been set out in the Environmental Management Plan that has been produced as part of the Environmental Statement and secured through the Development Consent Order.</p>	
422	Swindon Parish Council	Active Travel	<p>The active travel corridor currently terminates into the junction at the north end of Gallagher Retail Park. To link up with existing and planned cycleways it needs to continue down Tewkesbury Road to link</p>	No	<p>The Elms Park Planning application has further improvements, including cycle provision for the A4019 east of the Gallagher Retail Park Junction and is outside the scope of the Scheme.</p>	

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			up with the junction with Manor Road / Hayden Road.			
423	Swindon Parish Council	Active Travel	The proposals do not show sufficient provision for safe crossing of pedestrians and cyclists at the North End of Gallagher Retail Park. There must be appropriate provision of crossings close to the junction / crossing / other active modes going straight on the A4019, in line with recent changes to the Highway Code.	No	All active travel infrastructure has followed the latest guidance and design standards including Local Transport Note 1/20.	All active travel infrastructure has followed the latest guidance and design standards including Local Transport Note 1/20.
424	Swindon Parish Council	Traffic	As detailed in the Joint Core Strategy and the Cheltenham Plan, a Park and Ride facility is expected to deliver sustainable transport from close to the M5 Junction 10 into Cheltenham town centre and other key areas. It is not the intention that the Park and Ride would provide direct benefit to the Elms Park Development at North West Cheltenham. This proposed scheme for M5 and Tewkesbury Road should clearly show the link with the expected Park and Ride facility which should be positioned on the north side of the A4019 as part of the North West	N/A	The Park and Ride is part of the Elms Park planning application, and therefore outside the scope of the Scheme. However, the Applicant has been continuing to engage with the developers and Local Planning Authorities to ensure the Scheme takes this into account.	

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			Cheltenham strategic area for development. It is essential that detailed scheme for the M5 junction show the connections onto the Park and Ride and demonstrate that the road network can support such a facility.			
429	The Environment Agency	Environment	The Environment Agency would also require details such as the location of work compounds, location of temporary spoil storage areas, details of the phasing works and a flood warning/evacuation procedure to all be included with the supporting details for any planning application. This may avoid the need for both parties to duplicate the same work to obtain separate permissions under the Environmental Permitting Regulations 2016.	N/A	Further details have been provided as part of the Environmental Statement. The item on flood warning/evacuation procedure has been covered at a high level within the draft Environmental Management Plan, which has been produced as part of the Environmental Statement, and Emergency Preparedness and Response Plan (including a Flood Management Plan, and a Severe Weather Plan) will be produced as part of the second iteration of the Environmental Management Plan. The Contractor will address this specifically as part of their activities, and provide more detail as part of the Development Consent Order requirements discharge process.	

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430	Uckington Parish Council	Active travel	The Parish Council considers in any Scheme a fully integrated cycle path should be linked to Coombe Hill.	No	The Scheme's funding from Homes England is for work associated with unlocking the three development areas east of Junction 10. Whilst it is recognised the benefits of extending the cycleway to Coombe Hill, the scale of work required is beyond the scope of what can be delivered under the Scheme. Extending the cycleway is beyond the scope of the Scheme. The project team did examine the options, but these have not taken forward due to the need to balance the available budget across the Scheme.	The Scheme's funding from Homes England is for work associated with unlocking the three development areas east of Junction 10. Whilst it is recognised the benefits of extending the cycleway to Coombe Hill, the scale of work required is beyond the scope of what can be delivered under the Scheme. Extending the cycleway is beyond the scope of the Scheme. The project team did examine the options, but these have not taken forward due to the need to balance the available budget across the Scheme.
431	Uckington Parish Council	Design	If there is to be a Park and Ride facility it should be located at Junction 10.	No	The Park and Ride is part of the Elms Park planning application and is outside the scope of the Scheme.	The Park and Ride is part of the Elms Park planning application and is outside the scope of the Scheme.
432	Uckington Parish Council	Design	The Parish Council considers the A4019 / Stoke Road junction by The Gloucester Old Spot should be accommodated in any Scheme as this is a difficult and dangerous junction to negotiate and where traffic volumes will increase if the	No	The changes to Junction 10 are considered to indirectly improve the safety issues at the Gloucester Old Spot Junction. The scheme is not making any junction capacity improvements as this would further attract traffic onto Stoke Road, which is not	The changes to Junction 10 are considered to indirectly improve the safety issues at the Gloucester Old Spot Junction. The scheme is not making any junction capacity improvements as this would further attract traffic onto Stoke Road, which is not desirable

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			Scheme as proposed goes ahead.		desirable by residents and the Stoke Orchard Parish Council.	by residents and the Stoke Orchard Parish Council.
433	The Environment Agency	Environment	We would highlight the need to fully understand the groundwater regime in the area of the wetland compensation scheme, to avoid this area being full prior to out of bank fluvial flows reaching the feature meaning the proposals would not meet the design concepts outlined in the Preliminary Environmental Information Report or Flood Risk Assessment, this is deemed a potentially significant issue to providing appropriate mitigation.	N/A	Ground investigations in the area of the flood storage have been undertaken. The factual and interpretative information demonstrate that the ground is highly impermeable and will not be subject to groundwater ingress. However, the Groundwater investigations did find isolated and localised lenses of gravels near the southern boundary of the proposed storage area. There may be some intrusion, or infiltration, through these lenses through the excavated edge of the flood storage area. This is likely to be of negligible flow and would pass straight through the storage area and out through the Piffs Elm culvert. The Applicant does not perceive loss of the available storage volume through accumulation of groundwater. As such, the flood storage will remain available for overland flow and fluvial storage.	
434	Uckington Parish Council	Design	The Scheme remains very car-centric. Greater emphasis should be given to public	Yes	Bus priority measures are being considered and will form part of the Development Consent Order	Bus priority measures are being considered and will form part of the Development Consent Order

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			transport. There is still no bus service to Cheltenham Railway Station. There is no relief road or bypass around Cheltenham so to a great extent it seems the M5 Junction 10 and A4019 proposals are simply concentrating the traffic problems into Cheltenham. It is a case of the can being literally kicked down the road at enormous expense.		Application. Specific measures in the design include the northern verge of the A4019 widened to allow for future bus lane provision from the fire station to Gallagher Junction. The right turn lane from A4019 westbound to North West Cheltenham (Elms Park) Allocated Site access changed to bus only. The entrance to Park and Ride added to the west of Safeguarded Site access junction to match the developer's design.	Application. Specific measures in the design include the northern verge of the A4019 widened to allow for future bus lane provision from the fire station to Gallagher Junction. The right turn lane from A4019 westbound to North West Cheltenham (Elms Park) Allocated Site access changed to bus only. The entrance to Park and Ride added to the west of Safeguarded Site access junction to match the developer's design.
435	Uckington Parish Council	Traffic	The Parish Council remains very concerned that the increased traffic volumes (as admitted) will be detrimental to air quality, generate more traffic noise and vibration and cause biodiversity contamination and is not persuaded that the proposed mitigation will resolve these issues.	N/A	The impact of the Scheme is subject to the necessary environmental assessments including air quality modelling of the study area which provide the necessary information on potential impacts of the Scheme on air quality and mitigation measures to address them. This information is available in the Environmental Statement.	
436	Uckington Parish Council	Active Travel	The Parish Council is not satisfied that equine interests, which are a traditional local recreational activity, have been satisfied.	Yes	An underpass has been included beneath the A4019 to the east of M5 Junction 10 to provide a Public Rights of Way route from the bridleway AUC1 to Withybridge Lane. The underpass is intended to be	An underpass has been included beneath the A4019 to the east of M5 Junction 10 to provide a Public Rights of Way route from the bridleway AUC1 to Withybridge Lane. The underpass is intended to be shared use and has been

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					shared use and has been designed to accommodate equestrians. The underpass will provide a more desirable route for equestrians away from the A4019. Equestrian users will be accommodated at the east of the Scheme by the inclusion of an equestrian phase and a push button at the Uckington Junction linking the bridleway (AUC14) to The Green in the north.	designed to accommodate equestrians. The underpass will provide a more desirable route for equestrians away from the A4019. Equestrian users will be accommodated at the east of the Scheme by the inclusion of an equestrian phase and a push button at the Uckington Junction linking the bridleway (AUC14) to The Green in the north.
437	The Environment Agency	Environment	Any solution for the crossing of the Link Road through the Chelt flood plain should take account of the extents of Flood Zone, where an open viaduct structure should be considered to meet the avoidance principles.	N/A	The Link Road structures are described in the Scheme modelling report (issued March 2022). Testing has been undertaken to evaluate the size of conveyance structures and optimise the balance between a zero afflux structure and something smaller and its adverse impacts upstream. This follows the hierarchy of flood risk management taking into account the wider social, environmental, and economic factors in the design. Further testing was undertaken to establish the location of the floodplain crossing in relation to the overland flow paths.	

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438	The Environment Agency	Environment	Incidentally, there are some minor errors in the Flood Risk Assessment with respect to description of the current flood alleviation measures in the Chelt for example Dowdeswell reservoir, which is managed by the Environment Agency as one of three flood storage areas on the Chelt.	N/A	The ownership and operation of the Dowdeswell Reservoir have now been updated in the Flood Risk Assessment.	
439	Uckington Parish Council	Design	The Parish Council remains concerned; as to whether the flood defence plan will work, the removal of mature hedges and trees, the increased air and noise pollution from the proposed link road particularly as it would be raised, light pollution in a rural setting, A4019 Civil Service facilities ingress and egress, A4019 Homecroft Drive ingress and egress particularly by HGVs and confirmation of the speed limit of 40mph on the A4019.	Yes	Hydraulic modelling has been provided to the Environment Agency and is further documented in separate Baseline Modelling and Scheme Modelling reports. At this time the Environment Agency has reviewed the baseline model. Discussions on the Scheme modelling, and embedded mitigations have also been held with the Environment Agency. A drainage strategy has been produced. This describes how the new and old surfaces drain and how the discharges are regulated from flow, volume, and quality perspectives. The Scheme is proven to work in accordance with the UK standards and guidance and this has been evidenced in the	Access to the Civil Service facilities and Homecroft Drive have been amended in the latest design. The North West Cheltenham (Elms Park) Allocated Site access signalised junction has been relocated slightly to the west to provide an arm opposite the entrance to the Civil Service facilities and thus become a 4-arm junction. This 4th arm will be a 2-way service road serving the Civil Service facilities, the properties to the south of the A4019 in this location and Homecroft Drive. As such these will all have access to the A4019 in both directions via the signalised junction at North West Cheltenham (Elms Park) Allocated Site access. In addition to this, the Homecroft Drive arm at the signalised Site Access A junction has been

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					Development Consent Order submission.	<p>removed. Access to Homecroft Drive is provided by the 2-way service road which connects to the signalised junction at North West Cheltenham (Elms Park) Allocated Site access.</p> <p>It is understood that there is currently no access to Homecroft Drive for HGVs and if such a vehicle did try to access, they would then have to reverse out onto the A4019. Under the current design such a vehicle would no longer have to reverse back out onto the A4019 and instead could use the Homecroft Road junction with the service road to perform a turning maneuverer before gaining access back to the A4019 via the service road to the signalised junction at North West Cheltenham (Elms Park) Allocated Site access.</p> <p>The current proposed speed limits for the A4019 remain unchanged i.e. 40mph from approximately east of Cooks Lane and 50mph to the west of Cooks Lane.</p>
445	The Environment Agency	Environment	At this point in time we would register our concern that, based on the stage of the project at present, we do not consider it includes sufficient river and floodplain restoration	N/A	Additional detail has been added to the mitigation strategy as part of the landscape plans, Water Framework Directive assessment and Environmental Statement. It is the Applicant's	

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			in order to mitigate the impacts of the proposed development. As the Environmental Impact Assessment of the Scheme progresses and detailed design ensues, we are hopeful this will be rectified and realised, however the assessment as it stands does not appear to facilitate the necessary river and floodplain restoration we would expect to see.		understanding that the mitigation proposed as part of the Preliminary Environmental Information Report is sufficient and proportionate to the impacts of the Scheme. Following early consultation with the Environment Agency the Development Consent Order Limits were extended beyond normal best practice to include 100m upstream and downstream of crossings on the River Chelt. This provided sufficient space for meaningful enhancement measures to be applied, including bank rehabilitation, riparian improvements, and enhancements to the in-channel morphology.	
450	The Environment Agency	Environment	The Biodiversity chapter of the Preliminary Environmental Information Report provides a thorough and detailed initial account of the main environmental issues. However whilst some effects have been avoided, reduced, or mitigated the range of mitigation measures considered to offset the identified environmental effects	N/A	Additional detail has been added to the mitigation strategy as part of the landscape plans, Water Framework Directive assessment and Environmental Statement. It is the Applicant's understanding that the mitigation proposed as part of the Preliminary Environmental Information Report is sufficient and proportionate to the impacts of the Scheme and includes a wide	

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			<p>on the aquatic environment have been underestimated.</p>		<p>range of measures. Such measures include:</p> <ul style="list-style-type: none"> • A clear span structure over the River Chelt. • Provision of embedded culvert inverts. • Maintaining existing channel gradient to avoid erosion. • Minimising culvert length. • Application of best practice pollution prevention measures and silt management/control measures. • Avoidance of ecologically sensitive periods for fish species. • Reinstatement of riparian vegetation and habitat following construction and enhancing the physical form of the drainage ditches to improve habitat condition. • A drainage strategy to manage volumes and quality of surface water runoff. <p>In addition, following early consultation with the Environment Agency the Development</p>	

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					Consent Order Limits was extended beyond normal best practice to include 100m upstream and downstream of crossings on the River Chelt. This provided sufficient space for measures including bank rehabilitation, riparian improvements, and enhancements to the in-channel morphology.	
457	The Environment Agency	General	Within the Preliminary Environmental Information Report, the Scheme, has been defined as “essential infrastructure”. Whilst we consider that this is appropriate to the improvement works to the motorway junction and A4019 link, it could be considered that the West Cheltenham Link Road (the Link Road) is proposed to support future development only, which would fall outside of this definition. We would welcome the relevant Planning Authorities views on this matter in respect to future planning requirements.	N/A	The various elements of the Scheme clearly make up a single project, either as part of the main alignment or as associated development. Any works identified as associated development, linked to a Development Consent Order, have been treated in the same way as the main Development Consent Order during the examination process. In the case of the Scheme, the three elements of the road improvements (Junction 10, A4019 and the West Cheltenham Link Road) are all clearly linked and dependent on each other and should be considered as part of the main Development Consent Order. Therefore, for the purposes of the Development	

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					<p>Consent Order each element of the work, including:</p> <ul style="list-style-type: none"> • Formation of new or improved vehicular or pedestrian access (work sites etc), whether temporary or permanent. • Alteration or construction of roads, footpaths and bridleways. • Diversion or realignment of watercourses. • Construction of new road or foot bridges, and works to reconstruct, alter or replace existing ones. • Highway route/junction improvements (which may provide some benefit to third-party network users as well as users of the principal development). • Relocation of apparatus of statutory undertakers' equipment (mains, sewers, drains, pipes, cables, pylons etc). • Working sites, site offices and laydown areas. 	

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					<ul style="list-style-type: none"> Settlement lagoons and surface water balancing facilities. <p>For the reason set out above the Applicant is treating the entire Scheme as essential infrastructure as the full scheme makes up a single Development Consent Order and is required to enable the identified growth in the area.</p>	
459	The Environment Agency	Environment	In relation to West Cheltenham Link Road River Chelt Bridge, a single span structure is the preferred type of crossing to minimise impact on the water environment if designed appropriately. We welcome the clear span structure with no mid channel features with reduced interactions during the operational phase with the river bed and banks. However there are conflicting descriptions of the geometry of the bridge in relation to the river. Whilst there will not be the direct permanent habitat loss and significant habitat severance associated with the culverting of the other watercourses there is potential for changes to riparian and	Yes	<p>The details presented regarding the geometry of the River Chelt bridge have been reviewed and a consistent set of details has been presented as part of the Environmental Statement. The proposed bridge has a clear span of 24.8m to allow for a clear crossing of River Chelt with a minimum abutment offset from top of bank of 4m. The offset will ensure minimum disturbance during construction and provide a wildlife corridor and general through access in the permanent condition. The total bridge deck width is 20.8m to accommodate the single carriageway road and separated active travel route. The minimum deck soffit clearance to high ground level is 2.8m at 31.04m Above Ordnance</p>	Reprofiling of the river banks and the planting of appropriate vegetation either side of the River Chelt bridge, 100m upstream and downstream of the bridge to improve hydromorphological and ecological diversity. Provision of hard bank protection, such as e.g. rip-rap or non-biodegradable geotextile along both banks of the River Chelt underneath the River Chelt bridge. This will ensure the river banks are stable and do not retreat, potentially encroaching on the adjacent access tracks and bridge abutments. Reprofiling of the river banks and the planting of appropriate vegetation 100m upstream and downstream of the River Chelt culvert, and 200m downstream of the Leigh Brook culvert to improve

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			associated flood plain quality and as well as water body hydromorphology leading to changes in river processes and habitats upstream and downstream.		Datum, with the highest solid feature (top of parapet upstand) proposed at 32.82m Above Ordnance Datum. Details have been included in the environmental masterplan, the Environmental Statement and the Water Framework Directive assessment to create a two stage channel to allow for more natural flooding processes, and for riparian vegetation enhancements. Reprofiling of the river channel is proposed for the River Chelt upstream and downstream of both the proposed River Chelt bridge (Link Road) and the existing River Chelt culvert (M5), and for the Leigh Brook downstream of the existing Leigh Brook culvert (M5).	hydromorphological and ecological diversity.
460	The Environment Agency	Environment	We agree with the Water Framework Directive chapter set out in the Preliminary Environmental Information Report where it states it will be designed and constructed in such a way as to minimise disruption to the river and riparian zone with abutments being set well back from the bank edge to allow the river to	Yes	The layout of the new River Chelt Bridge is predominantly dictated by the proposed alignment of the Link Road, which crosses the river on a skew. A square (perpendicular) crossing was considered in the early stages but was found to only reduce the bridge span by around 1m, with greater negative impacts to the surrounding land due to	Reprofiling of the river banks and the planting of appropriate vegetation either side of the River Chelt bridge, 100m upstream and downstream of the bridge to improve hydromorphological and ecological diversity. Provision of hard bank protection, such as e.g. rip-rap or non-biodegradable geotextile along both banks of the River Chelt underneath

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			function naturally and to maintain a wildlife corridor along the banks. Where practically possible the bridge deck should run perpendicular to the watercourse (to reduce shading). Bed and bank protection should only be used where a real risk to life or critical infrastructure is apparent.		reprofiling of the highway in order to achieve a square approach. There is a possibility that bank protection will be necessary to reduce the risk of erosion due to vegetation loss under the structure. This is being considered to determine requirements and outline if there are any alternate solutions. It is likely that the details of the bank protection will be determined at detailed design stage	<p>the River Chelt bridge. This will ensure the river banks are stable and do not retreat, potentially encroaching on the adjacent access tracks and bridge abutments.</p> <p>Reprofiling of the river banks and the planting of appropriate vegetation 100m upstream and downstream of the River Chelt culvert, and 200m downstream of the Leigh Brook culvert to improve hydromorphological and ecological diversity.</p>
461	The Environment Agency	Environment	The Water Framework Directive assessment assumes a clear span structure with a 25m deck width with abutments set back 5m from the river bank tops. The Preliminary Environmental Information Report states a 24 m wide span with the deck soffit set at least 600 mm above the predicted design flood level of 27.75 m Above Ordnance Datum. The abutments will be set back from the river banks by 4m on the north and 8m on the south, permitting access under the bridge on both banks if required.	Yes	<p>The following set of sizes have been used in the Environmental Statement and the supporting documents (including the Water Framework Directive assessment):</p> <p>The bridge will have a clear span of 24.8m to allow for a clear crossing of River Chelt with a minimum abutment offset from top of bank of 4m. The offset will ensure minimum disturbance during construction and provide a wildlife corridor and general through access in the permanent condition. The total bridge deck width is 20.8m to accommodate the single carriageway road and separated</p>	<p>Reprofiling of the river banks and the planting of appropriate vegetation either side of the River Chelt bridge, 100m upstream and downstream of the bridge to improve hydromorphological and ecological diversity.</p> <p>Provision of hard bank protection, such as e.g. rip-rap or non-biodegradable geotextile along both banks of the River Chelt underneath the River Chelt bridge. This will ensure the river banks are stable and do not retreat, potentially encroaching on the adjacent access tracks and bridge abutments.</p> <p>Reprofiling of the river banks and the planting of appropriate</p>

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					active travel route. The minimum deck soffit clearance to high ground level is 2.8m at 31.04m Above Ordnance Datum, with the highest solid feature (top of parapet upstand) proposed at 32.82m Above Ordnance Datum.	vegetation 100m upstream and downstream of the River Chelt culvert, and 200m downstream of the Leigh Brook culvert to improve hydromorphological and ecological diversity
466	The Environment Agency	Environment	The Preliminary Environmental Information Report refers to advice from the Environment Agency indicating that a 4m easement on the south bank and a 2m easement on the north bank would be acceptable for their regulatory requirements. However this would represent a significant compromise ecologically and geomorphological and may necessitate bank protection. Whilst a reduction of easement width to below 8m to help reduce the span, supported by a small layby to allow operatives to pull off the road to safely access may be necessary, the operating principal is the wider it can be the better for the environment.	Yes	The bridge will have a clear span of 24.8m to allow for a clear crossing of River Chelt with a minimum abutment offset from top of bank of 4m. The offset will ensure minimum disturbance during construction and provide a wildlife corridor and general through access in the permanent condition. The total bridge deck width is 20.8m to accommodate the single carriageway road and separated active travel route. The minimum deck soffit clearance to high ground level is 2.8m at 31.04m Above Ordnance Datum, with the highest solid feature (top of parapet upstand) proposed at 32.82m Above Ordnance Datum.	<p>Reprofiling of the river banks and the planting of appropriate vegetation either side of the River Chelt bridge, 100m upstream and downstream of the bridge to improve hydromorphological and ecological diversity.</p> <p>Provision of hard bank protection, such as e.g. rip-rap or non-biodegradable geotextile along both banks of the River Chelt underneath the River Chelt bridge. This will ensure the river banks are stable and do not retreat, potentially encroaching on the adjacent access tracks and bridge abutments.</p> <p>Reprofiling of the river banks and the planting of appropriate vegetation 100m upstream and downstream of the River Chelt culvert, and 200m downstream of the Leigh Brook culvert to improve hydromorphological and ecological diversity</p>

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467	The Environment Agency	Environment	The section on wildlife crossings in the Preliminary Environmental Information Report makes reference to otter ledges to be installed on both sides of the River Chelt bridge, along the Link Road. Are these attached to the structure above the height of the flood levels in addition to the natural bank? As maintaining a bankside strip will additionally act as a mammal easement below the Link Road in most river level conditions. As part of any additional design measures higher level mammal passage may be required below the roadway. This will be assessed following the completion of the flood modelling work.	Yes	The otter ledges under the River Chelt bridge have been removed. However, a new otter ledge is included within the existing River Chelt culvert (underneath the M5). Tunnels for wildlife including otters) are included in the design, underneath the West Cheltenham Link Road.	The otter ledges under the River Chelt bridge have been removed. However, a new otter ledge is included within the existing River Chelt culvert (underneath the M5). Tunnels for wildlife (including otters) are included in the design, underneath the West Cheltenham Link Road.
468	The Environment Agency	Environment	We strongly support landscape plans and other embedded measures designed to encourage use of these features and prevent otters from accessing the carriageway. We advocate an acknowledgement that otters also travel overland particularly along ditches and hedgerows and the increase in complexity	N/A	An acknowledgement that otters also travel overland has been included in the Environmental Statement and has considered accordingly.	

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			and hazards as a result of the scheme and associated developments leads to some residual risk.			
470	The Environment Agency	Environment	The Preliminary Environmental Information Report acknowledges there are potential opportunities for enhancements to aquatic features across the Scheme, which will contribute to any biodiversity net gain targets and may contribute to the Strategic Nature Areas. We would welcome more detail on this aspect.	N/A	Additional detail has been added to the mitigation strategy as part of the landscape plans, Water Framework Directive assessment and Environmental Statement.	
472	The Environment Agency	Environment	We note that the storage design was proven in the hydraulic model and it includes for nominal 1 in 3 side slopes around the wetland, it is important that this don't translate into final design and there is stronger commitment to optimise the biodiversity value of this feature with organic planform shape that includes bays, inlets and islands, so promoting a future wetland area with significant excavation below existing ground level proximity of	N/A	This has been considered through the development of the design and reported in the Environmental Statement.	

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			floodplain compensation area to the road junction will impact on its attractiveness to some wildlife.			
473	The Environment Agency	Environment	Additional mitigation will need to be included in the next stage of design to mitigate impacts on the water environment and reach compliance with Water Framework Directive and other relevant planning policy.	N/A	Additional detail has been added to the mitigation strategy as part of the landscape plans, Water Framework Directive assessment and Environmental Statement. It is the Applicant's understanding that the mitigation proposed as part of the Environmental Statement is sufficient to ensure compliance with the Water Framework Directive and other planning policy outlined within the Road Drainage and the Water Environment Chapter.	
475	The Environment Agency	Environment	The Preliminary Environmental Information Report states that opportunities to enhance and restore sections of the River Chelt may be available within the redline boundary. Our assessment is that an element of river restoration is required to mitigate the impacts of the scheme and on top of that improvements to watercourses and riparian condition to align with Water Framework	N/A	Additional detail has been added to the mitigation strategy as part of the landscape plans, Water Framework Directive assessment and Environmental Statement. It is the Applicant's understanding that the area assigned for mitigation measures (100m upstream and downstream of crossings on the River Chelt) will be sufficient to align with Water Framework Directive legislation.	

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			Directive status objectives are essential.			
479	The Environment Agency	Environment	We maintain the view that it is not yet possible to scope out/prevent the future attainment of Good status. In relation to Test B, the Water Framework Directive requires that surface water discharges are managed so that their impact on the receiving environment is mitigated. The objective is to protect the aquatic environment and control pollution from diffuse sources such as urban drainage – a key aspect that effectively precludes use of the traditional approach to drainage.	N/A	<p>The Highways Agency Water Risk Assessment Tool (Design Manual for Roads and Bridges LA 113) has been used to determine whether the risk to the receiving surface water receptors water quality is acceptable and whether any surface water receptors require mitigation through three assessments:</p> <ul style="list-style-type: none"> • Assessment of acute impacts from soluble pollutants. • Assessment of chronic impacts due to sediment related pollutants. • Compliance with Environmental Quality Standards for dissolved copper and dissolved zinc. <p>A pass for these three assessments demonstrates that the Scheme adequately mitigates against potential impacts on water quality and will therefore pass Test B.</p>	
480	The Environment Agency	Environment	With regards to mitigation measures for the River Chelt set out in the Preliminary	N/A	Additional detail has been added to the mitigation strategy as part of the environmental masterplan,	

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			Environmental Information Report - source to M5 water body makes reference to potential Water Framework Directive mitigation measures which are all possible and necessary within and without the redline boundary. These include working with physical form and function (e.g. remove obsolete structures, re-engineer river, remove or soften hard banks, improve in-channel morph diversity, bank rehabilitation, re-opening culverts alter culvert channel bed and set-back embankments to restore floodplain connectivity and fish passes).		and the Water Framework Directive assessment presented as part of the Environmental Statement. It is the Applicant's understanding that the mitigation proposed is be sufficient to be compliant with the Water Frame Directive and other planning policy. The approach to the implementation of mitigation measures is proportionate to the impacts of the Scheme.	
481	The Environment Agency	Environment	The flood risk assessment makes reference to many of the River Chelt banks in this area being slightly raised above the local floodplain. In the context of flood risk during construction of the Scheme, that may impact on the works or third party receptors. Lowering of slightly raised levels in the river restoration zone should be factored into the model as a potential	Yes	Enhancement measures along the River Chelt will include reprofiling the shape of the banks in places. However, the flood risk implications have been considered and bank levels will not be lowered. To confirm, the River Chelt banks are not being raised, or lowered, as part of the Scheme, nor during the anticipated construction works. Improvements to the connectivity of the wider floodplain cannot be	Enhancement measures along the River Chelt will include reprofiling the shape of the banks in places. However, the flood risk implications have been considered and bank levels will not be lowered. To confirm, the River Chelt banks are not being raised, or lowered, as part of the Scheme, nor during the anticipated construction works. Improvements to the connectivity of the wider floodplain cannot be implemented as it would increase

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			means of improving connectivity with the flood plain and bank enhancements.		implemented as it would increase flood risk to farmland and other receptors, specifically in the frequency of flooding. However, localised berms and channel widening are being proposed as part of the reprofiling enhancements.	flood risk to farmland and other receptors, specifically in the frequency of flooding. However, localised berms and channel widening are being proposed as part of the reprofiling enhancements.
482	The Environment Agency	Environment	There is reference to improving in-channel and riparian habitat diversity, bank re-profiling, riparian planting and removal of invasive species (namely Himalayan balsam). The Environment Agency note that the redline boundary has been extended 100m upstream and downstream of the two River Chelt crossings to allow for enhancements along these sections of channel. The Environment Agency would recommend an extension to this boundary particularly with respect to net gain.	No	Following early consultation with the Environment Agency the Development Order Limits was extended beyond normal best practice. This provided sufficient space for meaningful mitigation measures to be applied, including bank rehabilitation, riparian improvements and enhancements to the in-channel morphology. Further extensions to the Development Order Limits would require further justification and clarifications from the regulator. Further extension of the Development Order Limits is not expected to be required to achieve the Scheme's biodiversity net gain.	No further extension has been identified as required for biodiversity or water quality enhancements.
483	The Environment Agency	Environment	Although the Severn Estuary Special Protection Area, Special Area of Conservation and Ramsar site boundary is 23km south-west of the	N/A	This has been captured in the Environmental Statement as well as in the Habitats Regulations Assessment.	

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			Scheme it is important to capture the distance downstream to confluence with the tidal Severn River Chelt, Leigh Brook, and River Swilgate) running from east to west, before draining into the River Severn (at least 7.5km downstream of the Scheme).			
484	The Environment Agency	Environment	The importance valuation of the River Chelt in the Preliminary Environmental Information Report does not refer to the native brown trout that reside in the river. The Water Framework Directive assessment makes reference to Environment Agency fish monitoring sites which have been surveyed within the last 10 years where bullhead, three-spined stickleback, brown trout and European eel were found and acknowledges that the species present are considered to be important. The European eel being a Critically Endangered species on the International Union for Conservation of Nature Red List of Threatened Species (2010), species of Principal Importance under section 41 of	N/A	The Biodiversity chapter within the Environmental Statement makes reference is to these fish species. In addition, consistency between all chapters of the Environmental Statement have been reviewed and corrected as necessary. It is considered that, even with the consideration of these additional species, the valuation of the River Chelt would remain at County importance.	

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			<p>the Natural Environment and Rural Communities Act 2006, and a UK Biodiversity Action Plan (2007) priority fish species. Brown trout is a species of principal importance under section 41 of the Natural Environment and Rural Communities Act 2006 and a UK Biodiversity Action Plan (2007) priority fish species. Bullhead is a European Commission Habitats Directive Annex II non-priority species 4 (in section 4.1.35). Additionally, in 2014 during a previous survey, in section 4.1.35. Atlantic salmon are mentioned as being recorded at Site ID 52484. Atlantic salmon is a European Commission Habitats Directive Annex II and V species, a species of Principal Importance under section 41 of the Natural Environment and Rural Communities Act 2006 and a UK Biodiversity Action Plan (2007) priority fish species. Salmon Par have also been caught during fish rescues downstream at Norton prior to a weir removal and subsequent to the removal are</p>			

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			expected to be able to migrate upstream.			
485	The Environment Agency	Environment	Timing with respect to fish. The summary document highlights that Construction of the River Chelt bridge will avoid ecologically sensitive periods for fish species e.g. migratory/spawning periods, in particular for European eel. This also needs to take into account the salmonid spawning season.	N/A	Key ecologically sensitive periods have been added to the Register of Environmental Actions and Commitments which will form part of the Development Consent Order Application.	Key ecologically sensitive periods have been added to the Register of Environmental Actions and Commitments which will form part of the Development Consent Order Application.
486	The Environment Agency	Environment	The Environment Agency strongly welcome inclusion of our suggestion to retrofit an otter ledge within the existing River Chelt culvert beneath the M5, on the opposite side of the footbridge which we consider essential mitigation. We note that otters currently use the footbridge, but camera footage and observations have identified that it floods. Retrofitting an otter ledge will provide safe passage during times of flood.	Yes	The otter ledge within the River Chelt culvert has been included as part of the current design and is in the Environmental Statement.	The otter ledge within the River Chelt culvert has been included as part of the current design and is in the Environmental Statement.
487	The Environment Agency	Environment	The Preliminary Environmental Information Report refers to the existing M5 crossing on the River Chelt being assumed to	N/A	The flood modelling undertaken for this Scheme is not based on the assumption that sediment has been removed. The	

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			be embedded due to the presence of gravel and silt substrates through the culvert. Elsewhere there is reference to the potential need to clear this material. We request that model runs including blockage runs include this sediment and high channel roughness to ascertain if the natural substrate can be retained in the long term to maintain habitat continuity and quality and reduce or remove unsustainable ongoing management and disposal of material to a minimum.		Applicant agrees that sediment and natural substrate should be kept in place.	
488	The Environment Agency	Environment	There are several references to the drainage ditches to be relocated due to encroachment from road widening and embankment and the current plan to replace with like for like habitats. Even though some of these watercourses will not be in water all year it is best practice to replace with an improved physical habitat e.g. with variation in bank slope and improved sinuosity. The details of these replacements in the Preliminary Environmental Information	N/A	Where possible within the Scheme boundary, the physical form of the drainage ditches will be enhanced, including forming some sinuosity (where space is available to allow for this) and variation in profile. However, these will be largely dry/ephemeral and vegetation will likely dominate, therefore appropriate seeding will be applied.	Where possible within the Development Consent Order Limits, the physical form of the drainage ditches will be enhanced, including forming some sinuosity (where space is available to allow for this) and variation in profile. However, these will be largely dry/ephemeral and vegetation will likely dominate, therefore appropriate seeding will be applied.

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			Report refer to them being sown with a wet grassland seed mix of appropriate provenance and to represent geographical context however this will be much more meaningful and significant if the physical habitat is enhanced.			
491	The Environment Agency	Environment	The description of Morphological enhancements in the Water Framework Directive chapter (Scheme wide) refers Watercourse channels and ditches adjacent to roads have often been modified by previous road building or drainage schemes. Hence, in some instances, the realignment of a channel can present an opportunity to restore channels to a more natural state of ecological function in line with Water Framework Directive objectives. As there will be extensive lengths of ditches created as part of the Drainage and Environment Plans, there is potential for enhancement of these features to create a biologically diverse habitat. This will help the attainment of	N/A	Additional detail has been added to the mitigation strategy as part of the landscape plans, Water Framework Directive assessment and Environmental Statement. The extent and nature of the plans are being discussed further as part of the Statement of Common Ground.	

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			Good through the preservation and restoration of habitats and enhancements to ecology as part of the mitigation measures set out by the Environment Agency. This potential does not yet appear to have been realised in the current design iterations.			
492	The Environment Agency	Environment	The Environment Agency have concerns regarding the cited guidance presented in the Design Manual for Roads and Bridges LA 113. Whilst Q95flow is an indicator of the likely importance of a watercourse and being Main River can be a surrogate for size and importance it is not necessarily the case that being an ordinary watercourse means it is of less importance. In this instance there is a correlation but in many parts of the area and County, and the country as a whole, ordinary watercourses can be of as high or high importance hydromorphologically and ecologically as main river. Main River being a function of flood risk and serving only to clarify where the Environment	N/A	The Applicant acknowledges the potential limitations of the guidance in this context, however LA 113 is part of the overall Design Manual for Roads and Bridges guidance and therefore has been applied appropriately. Further clarification and assessment have been undertaken as part the Environmental Statement and Water Framework Directive and discussed further as part of the Statement of Common Ground.	

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			Agency has permissive powers to maintain watercourses for flood risk management purposes. Similarly, the Water Framework Directive designation of a stretch of watercourse does not mean that that is the only reach or part of the catchment that is relevant for consideration in a Water Framework Directive assessment but is a proxy, largely for monitoring and reporting purposes for the other controlled waters in the waterbody or catchment.			
493	Natural England	Environment	Consistent with the Nationally Significant Infrastructure Project scheme's fundamental role in delivering a range of benefits for the North West and West Cheltenham strategic allocations Natural England strongly encourages clear reference to the natural environment opportunities and enhancements flowing from this scheme. Impacts may be positive as well as negative. They should include consideration of the synergies on offer by integrating environmental and social	N/A	This has been addressed in the Environmental Statement, and further dialogue with Natural England is taking place through a Statement of Common Ground.	

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			themes, in particular through multifunctional green and blue infrastructure. Natural England would welcome further dialogue with you in order to inform the scheme's design.			
494	Natural England	Environment	This approach is supported by: The report's reference (7.2.19) to paragraphs 5.20 – 5.38 of National Policy Statement for National Networks, 2014, in particular "the applicant should show the extent to which the project has 'taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests'.	N/A	This has been addressed in the Environmental Statement, and further dialogue with Natural England is taking place through a Statement of Common Ground.	
497	Natural England	Environment	In relation to National Policy Statement for National Networks paragraphs 5.22-23 relating to designated sites Natural England also draw your attention to: the emerging Cotswold Beechwoods Special Area of Conservation 'strategic solution'. This project's focus on informal recreation involves an area of land ('zone of influence') which includes the scheme red line boundary.	N/A	It is acknowledged that the Scheme will 'unlock' a number of housing developments that will result in an increase in residents in the area, which could potentially result in an increase in visitor pressure to the sites mentioned. Further consideration has been given to in-combination recreational impacts as part of the Cumulative Effects Assessment, and the documents mentioned have been reviewed to support this. The Habitats	

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			<p>This represents a further consideration and an opportunity to integrate the scheme's design with the strategic allocations' land use planning context.</p> <p>b. The ongoing joint commission by Gloucestershire's local planning authorities to conduct visitor surveys of key destinations around the Severn Estuary and sites within the Severn Vale identified as having proven or possible functional linkages with the Severn Estuary Special Protection Area (SPA). The latter include Coombe Hill Canal SSSI and Coombe Hill Meadows Nature Reserve a short drive west from the scheme.</p>		<p>Regulations Assessment incorporates any potential in-combination recreational effects on the Cotswold Beechwoods Special Area of Conservation and the Severn Estuary Ramsar/Special Protection Area. The Habitat Regulations Assessment also considers the plan-level Habitats Regulation Assessment for the local plan, and bears in mind that the respective housing developments will also require Habitat Regulations Assessment, and the incorporation of mitigation measures as necessary.</p>	
498	Natural England	Environment	<p>Natural England note the reference to designated sites, in particular the Severn Estuary Ramsar/SPA/SAC. We would caution against screening this site on distance alone.</p>	N/A	<p>The Applicant has considered the distance between the Severn Estuary Ramsar/Special Protection Area/Special Area of Conservation and the Scheme but have also taken into account functional linkage between the Scheme and the designated site. It concludes a potential functional linkage between the Scheme and</p>	

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					the qualifying feature populations of migratory fish within the River Chelt. Further consideration has been given to recreational impact pathways, and it has been incorporated into the updated Habitats Regulations Assessment Screening and Statement to Inform an Appropriate Assessment reports (Technical Appendix 7.13 and 7.47 respectively).	
500	Natural England	Environment	We previously drew attention to the issue of Functional Linkage for the Severn Estuary Special Protected Area Wild Birds. Natural England has commissioned a report, currently unpublished, "Identification of land with proven or possible functional linkages with the Severn Estuary SSSI/SPA – Phase 5 (Gloucestershire and Worcestershire)" (Link Ecology). From our understanding of the report we would conclude that significant effects on functionally linked land may be screened out though the report shows that such land lies much closer to	N/A	This unpublished report was provided by Natural England previously and has been reviewed and referenced within the Habitats Regulations Assessment. As suggested, significant effects on functionally linked land with regard to wintering and migratory birds has been screened out, and this useful report provided valuable contextual information to strengthen this discussion.	

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			the project area than the Special Protected Area itself.			
502	Natural England	Environment	The Preliminary Environmental Information Report states that a flood compensation area between the M5 and the Link Road can provide positive environmental benefits. The wetland storage area and proximity to River Chelt suggests the scheme could very well include enhancements to help restore fish habitats for the SAC/Ramsar Site species. We would welcome further investigation here. Functional linkage between the site and the Severn Estuary has been established and it is accepted that mitigation is required. With regards to the birds, notified as part of the Severn Estuary Special Protected Area, reference should be made to the Phase 5 Functionally Linked Land Report, "Identification of land with proven or possible functional linkages with the Severn Estuary SSSI/SPA- Phase 5 (Gloucestershire and Worcestershire)" (Link	N/A	The Link Ecology report was provided by Natural England previously and has been reviewed and referenced within the Habitats Regulation Assessment. As suggested, significant effects on functionally linked land with regard to wintering and migratory birds has been screened out. No mitigation in respect of wintering and migratory birds associated with the Special Protection Area is necessary or has been provided.	

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			Ecology), to ensure that the approach to Page 3 of 4 mitigation is consistent with the detail of the report. This was made available in previous consultations.			
503	Natural England	Environment	It has been accepted that the scheme will cause disturbance to both European Eels and river lamprey during construction. Mitigation will need to be considered. Clarification of the content of the Construction Environmental Management Plan to cater for these species would be beneficial and necessary for the Habitats Regulation Assessment, and would support the conclusion to screen out these species.	N/A	Migratory fish have not been screened out on the Habitats Regulations Assessment. Likely Significant Effects a result of pollution during construction and operation on migratory fish using functionally linked habitat within the River Chelt has been identified in the Habitats Regulation Assessment Screening. In addition, Likely Significant Effect as a result of disturbance during construction to qualifying fish species using functionally linked habitat within the River Chelt has also been identified in the Habitats Regulation Assessment Screening. Migratory fish were therefore taken through to Appropriate Assessment, where detailed mitigation measures are proposed to reduce likely significant effects. Further information is included in the Habitats Regulation Assessment. An Environmental Management	

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					Plan has been produced to accompany the Environmental Statement.	
505	Natural England	Environment	A connection between the River Chelt and the Severn Estuary has been mentioned, along with features of the Severn Estuary. The Preliminary Environmental Information Report accepts that these habitats exist alongside the M5 motorway. A bridge over the river is proposed and it states that the bridge structure will avoid direct impacts to the river, ensuring fauna can continue to move through the river. No direct loss of river habitat is proposed, which is welcomed. With regards to the bridge, consideration should be given to a green bridge to help with habitat connectivity.	N/A	The Link Road will be carried over the River Chelt by way of a clear span bridge structure. Landscape planting along the verges of this road will provide wildlife corridors north/south and the clear span structure over the River Chelt will ensure that this river will remain as an important wildlife corridor.	
506	Natural England	Environment	The report has ruled out a hydrological connection to Coombe Hill Canal Site of Special Scientific Interest. It should be noted however, that there is a hydrological connection between the River Chelt and Coombe Hill Canal	N/A	This information has been included into the baseline section of the Environmental Statement to inform any potential impacts.	

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			Site of Special Scientific Interest and Coombe Hill Meadows at times of flooding (when flow is reversed/backed up and water floods from the River Chelt up onto the Site of Special Scientific Interest.			
507	Natural England	Environment	It is noted that the land within the red line boundary is 2km north and south of the highway. We would question how much net gain can be delivered within this land.	N/A	This refers to land within the Development Consent Order Limits that extends approximately 2km north of the works area and 2km south of the works area along the verges of the M5 motorway. In these areas, the only works that will take place are the installation of signage. The number and precise location of the signs are not currently known, and in any case, given that this would constitute minor, routine highway works, the entirety of these areas is assumed to be retained as they are currently. Net gain is therefore not anticipated from these areas.	
510	Natural England	Environment	Previous advice advised that as part of the process, through the Habitat Regulations Assessment, consideration of designated sites is sought and the impacts from air quality	N/A	The Preliminary Environmental Information Report air quality assessment was prepared in accordance with industry best practice guidance, LA105 published by National Highways,	

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			<p>examined. This will include for example, consideration of nitrogen deposition on any Sites of Special Scientific Interest. We would draw attention to the two pieces of case law; the Wealden Judgement and Dutch Nitrogen Case. Consideration should be given to the relevant methodology set out in Highways England’s ‘Design Manual for Roads and Bridges’. The Air Pollution Information System also provides specific information on the air quality theme for each designated site, which may be affected, and should be factored into the methodology when establishing the ‘baseline’.</p>		<p>to examine the potential impact of the Scheme on air quality in terms of human health and biodiversity. This includes for an assessment of air quality impacts as a result of nitrogen deposition from road traffic emissions on designated habitats within 200m of the affected road network. Designated habitats include European Sites, Statutory and non-statutory designated nature conservation sites, nature improvement areas, areas of ancient woodland and veteran trees. As described in the Preliminary Environmental Information Report, six non-statutory designated sites and one veteran tree were identified within 200m of the affected road network. The results of the Preliminary Environmental Information Report air quality assessment identified air quality improvements at all locations, with a reduction in nitrogen deposition rates estimated at all locations with the proposed Scheme in place.</p>	
519	Natural England	Environment	<p>It is noted that there are not nationally or locally important geological features within the</p>	N/A	<p>Further detail on construction is provided in the Environmental Statement and Environmental</p>	<p>Further detail on construction is provided in the Environmental Statement and Environmental</p>

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			<p>footprint of the scheme. Most of the engineering will involve raising embankments rather than excavating cuttings. The footprint of the scheme covers ground underlain by the Lower Jurassic Charmouth Mudstone Formation and the Pleistocene Cheltenham Sand and Gravel Formation. These may both be temporarily exposed in excavations for the balancing ponds and flood relief zone. However, the currents plans that have been provided are not detailed enough to set out the design and method of construction for these features. If the excavations for the ponds go to any depth (greater than 2 m) then there may be value in having a watching brief in order to record and collect from these temporary exposures.</p>		<p>Management Plan. A watching brief is provided as part of the proposed mitigation.</p>	<p>Management Plan. A watching brief is provided as part of the proposed mitigation.</p>
520	Natural England	Environment	<p>Natural England note that the scheme lies within the setting of the Cotswolds Area of Outstanding Natural Beauty. The views of the Cotswolds Conservation Board should be sought. Paragraph 176 of the National Planning Policy</p>	N/A	<p>The Cotswold National Landscape Board has been consulted and conclude that the Scheme is not likely to affect the Area of Outstanding Natural Beauty and are not required to be consulted on further. The Area of Outstanding Natural</p>	<p>The Cotswold National Landscape Board has been consulted and conclude that the Scheme is not likely to affect the Area of Outstanding Natural Beauty and are not required to be consulted on further. The Area of Outstanding Natural Beauty will remain as a</p>

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			Framework outlines the ‘great weight’ to be given to the conservation and enhancement of the landscape and scenic beauty of Areas of Outstanding Natural Beauty. It continues by stating that development within the setting of Areas of Outstanding Natural Beauty “should be sensitively located and designed to avoid and minimise adverse impacts on the designated areas”.		Beauty will remain as a receptor within the Landscape and Visual Impact Assessment.	receptor within the Landscape and Visual Impact Assessment.
537	Uckington Parish Council	General	The Parish Council is of the view that ‘the Scheme’ does not meet the key objectives.	N/A	The aim of the Scheme is to remove constraints on the highway network, improve connectivity between the Strategic Road Network and the local transport network, and ensure there is enough capacity to accommodate traffic demand associated with the housing and employment growth in the area. The Scheme also aims to provide safe access to services for the local community and for active travel users as well as establishing biodiversity net gain and meeting climate change requirements. The Scheme's objectives were developed using a systematic and established	

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					<p>process and formed part of the successful funding bid. Firstly, by undertaking a policy review to identify local and national strategic challenges the Scheme should be contributing too. Secondly, reviewing the quantified evidence provided for each challenge to ensure that achievement can be measured with outcomes. Thirdly, using the outcomes to identify scheme objectives that are specific, measurable, attainable, realistic and time bound. These are reviewed throughout the process to ensure as the Scheme develops it still meets these objectives.</p>	
539	Natural England	Active travel	<p>Natural England advises that consideration be given to ensuring protection and enhancement of public rights of way and National Trails, as outlined in paragraph 98 of the National Planning Policy Framework. Recognition should be given to the value of rights of way and access to the natural environment in relation to health and wellbeing and links to the wider green infrastructure network. The</p>	Yes	<p>There are limited direct connections to existing rights of way in the Scheme extents. However, a crossing of the A4019 is being included to improve the permeability of the bridleway network and public footpaths are being upgraded near the River Chelt where these are affected by the Scheme. Improvements to the A4019 junction at Uckington may also include provision to assist horse-</p>	<p>An underpass has been included on the A4019 to the east of M5Junction 10 to provide a Public Rights Of Way route from the bridleway AUC1 to Withybridge Lane. The underpass is shared use and has been designed to accommodate equestrians. The underpass will provide a more desirable route for equestrians away from the A4019. Equestrian users will be accommodated at the east of the Scheme by the inclusion of an equestrian phase and a push button</p>

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			proposal should seek to link existing rights of way where possible, and provides for new access opportunities.		riders when crossing the A4019 at this junction.	at the Uckington Junction linking the bridleway (AUC14) to The Green in the north.
550	Bloor Homes	Environment	The Gloucestershire County Council Scheme offers no significant benefit to the Western Expansion land in the 1 in 100 year flood event. It is likely that the M5 Junction 10 scheme will offer an improvement to the ability to develop the Western Expansion land, but the degree to which this would occur cannot be determined from the scenarios provided. The hydraulic model has not been provided within the consultation documents.	N/A	The hydraulic model has been provided to the Environment Agency and is further documented in separate Baseline Modelling and Scheme Modelling reports. At this time the Environment Agency has reviewed the baseline model. Discussions on the Scheme modelling, and embedded mitigations have also been held with the Environment Agency. The western expansion land (Safeguarded Site) being the land to the north of the A4019 on the east of the M5 motorway will receive significant and notable benefit in terms of flood risk as a result of the Scheme. Details on this are presented within the Environmental Statement.	
560	UK Health Security Agency - Public Health England	Environment	Regarding possible sensitive receptors, the Applicant states in the Preliminary Environmental Information Report that there is a Travellers' site adjacent to the southbound carriageway of the	N/A	The Informal Traveller site adjacent to the M5 is not a permitted site. However the Environmental Statement assumes that the site will be occupied at the time of construction of the Scheme, and	

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			<p>M5, approximately 400 m north of Junction 10. However, it is not clear from the Preliminary Environmental Information Report if this site is fixed or temporary. Also, it appears that the site has not been accounted for in the list of sensitive receptors. Regardless of the status of the site, it does not seem as if the Applicant have assessed the impacts at construction or operational phase and we request that this is included.</p>		<p>has therefore included this site as a sensitive receptor within the assessments undertaken.</p>	
561	UK Health Security Agency - Public Health England	Environment	<p>The use of a Health Impact Assessment should be confirmed, and details made available regarding the methodological approach to the Health Impact Assessment and how the findings of a Health Impact Assessment and Environmental Impact Assessment will be reported. Should a Health Impact Assessment not be provided, details must be made available to justify the change and agreed with The Office of Health Improvement and Disparities and the local public health team.</p>	N/A	<p>An Equality Impact Assessment has been produced for the Scheme and will be referred to in the Population and Human Health chapter. The requirement to produce a separate Health Impact Assessment has been reviewed and it has been concluded that such a document is not required for the Scheme. Instead of a separate Health Impact Assessment, the human health section of the Population and Human Health chapter will be expanded to describe health characteristics in greater detail, including consideration of mental health data; use data analysis to</p>	

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					identify and include relevant vulnerable groups within the health baseline; and strengthen approach to consultation and engagement process and outcomes. Summary tables will be included to provide greater clarity in expressing the outcomes of the assessment, and to better connect health outcomes with impacts.	
569	UK Health Security Agency - Public Health England	Environment	The potential for severance should be assessed and supported by an evidence-based justification. The wider road network likely to be affected by the construction phase should be considered in relation to road safety and matters considered within the IEMA GEART guidelines. A traffic and transport assessment should consider road safety and identify embedded or additional mitigation for both construction and operational phases of the scheme.	N/A	The Population and Human Health assessment draws on the findings of the noise and air quality assessments (amongst others). Both of these develop modelling that is rooted in traffic modelling for the Scheme. This traffic modelling explores the likely dispersion of traffic across the network under different scenarios and identifies potential changes to 'rat runs', allowing for the resultant impacts on traffic flows, air quality and noise climate to be quantified in accordance with the recognised Design Manual for Roads and Bridges methodologies. The Population and Human Health assessment follows the LA112 methodology to take account of these technical assessments and	

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					highlight them as appropriate within the Environmental Statement. The potential impacts of traffic reassignment are given due consideration in relation to the effects that may be identified. The scheme design has been subject to a Stage 1 Road Safety Audit. A Stage 2 Road Safety Audit will be undertaken at Detailed Design and a Stage 3 following scheme construction. These Road Safety Audits will identify any road safety issues with the design.	
577	UK Health Security Agency - Public Health England	Environment	Much greater clarity, certainty and detail is required within the Environmental Statement to demonstrate the proposed mitigation, which will ultimately form the development commitments. The Environmental Statement should provide a Public Rights of Way Management Plan, Construction Management Plan to include details of the road traffic management during construction.	N/A	This is addressed in the Environmental Statement, which includes a Public Right of Way Management Plan and Construction Management Plan to include details of the road traffic management during construction.	
586	Uckington Parish Council	Environment	As to the proposed development at West Cheltenham and the proposed	N/A	This option is not deemed suitable as Junction 11 already suffers from congestion. It is	

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			Cyber Park the Parish Council considers they would be better served by access to and from Junction 11 rather than building a new link road from Junction 10 with the substantial land take and damaging environmental impacts.		therefore considered necessary to provide the West Cheltenham Link Road to relieve the pressure that the West Cheltenham Development would have on Junction 11.	
727	Elmstone Hardwicke Parish Council	Design	There is a complete lack of thought to the roads on the west side of Junction 10, the opening up to four ways at Junction 10 will drastically increase traffic on the A4019 and in particular the Stoke Orchard to Piffs Elm road, which is heavily used at the moment and in need of improvement as is the road from Bishops Cleeve, and surrounding areas as it will draw even more traffic wishing to access Junction 10. In conclusion roads on the west side of Junction 10 will need to be upgraded and improved.	N/A	Traffic modelling has been undertaken and included in the Transport Assessment Report within the Development Consent Order submission.	
730	Elmstone Hardwicke Parish Council	General	This proposal will have a detrimental effect on the quality of life for the people that will be living in the shadow of the plan and should be	N/A	The level of new homes and employment areas have been set out in the Joint Core Strategy which has been agreed between the three local planning	

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			scrapped the area is becoming over developed this is a rural part of the county which will be lost forever because once done it will become a developers paradise.		authorities: Cheltenham Borough, Tewkesbury Borough, and Gloucester City Councils. The Joint Core Strategy forms part of the statutory development plan for these areas. The Scheme's aim is to remove constraints on the highway network, improve connectivity between the Strategic Road Network and the local transport network, and ensure there is enough capacity to accommodate traffic demand associated with the housing and employment growth in the area. The Scheme also aims to provide safe access to services for the local community and for active travel users as well as establishing biodiversity net gain and meet climate change requirements.	
706	Golden Valley Development	Active Travel	An enhancement would be to provide the cycle lanes that are planned adjacent to the A4019, and West Cheltenham Link Road connected by a similar facility adjacent to B4634 to ensure a more interconnected network for cyclists.	No	The B4634 lies outside the boundary of the Scheme. The B4634 is part of the Gloucestershire County Council's Local Cycling and Walking Infrastructure Plan network and there may be future aspirations to provide facilities along this link.	The B4634 lies outside the boundary of the Scheme. The B4634 is part of the Gloucestershire County Council's Local Cycling and Walking Infrastructure Plan network and there may be future aspirations to provide facilities along this link.

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
707	Golden Valley Development	Design	An enhancement would be the provision of bus lanes/priority at Junction 10 to improve public transport to/from and across Junction 10. It is not clear if bus priority has been included in the modelling works that have been undertaken and if so the construction cost implications for this have been taken into account when reaching the designs that are currently being consulted upon. In the context of the wider aim of decarbonising transport such a measure is future proofed, if not provided at this stage due to cost. We would respectfully request that all technical and financial evidence related to bus priority be shared at the Development Consent Order. We consider it essential that this nationally significant piece of infrastructure not only caters for current planned growth and travel patterns, but subsequent Local Plans and expected changes in travel behaviours; the use of buses being a key component of the Connecting Cheltenham Strategy.	No	The Scheme has undertaken traffic modelling in accordance with national guidance. However, the need for modal shift in transport provision is recognised. The Scheme includes high quality active travel facilities. The Applicant is continuing to examine bus provisions, including options that would allow for future provision to coincide with the delivery phasing of the Development Sites. The Applicant is working with the local planning authorities on elements that the Scheme can provide and those outside the scope of the Scheme, which therefore need to be provided by others.	

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708	Golden Valley Development	General	The final position on the proposed Infrastructure Recovery Strategy, consulted on in March 2021, is required. The Infrastructure Recovery Strategy proposes a mechanism to recover the costs of the proposed M5 Junction 10 works from developments that in some way benefit from those works. Cheltenham Borough Council as landowner and developer raised a number of concerns about the mechanism proposed. It would be very helpful to get clarity on the future of the proposal set out in the Infrastructure Recovery Strategy.	N/A	The Applicant understands the importance of this information and is waiting for further information on recovery from the Scheme funders, Homes England, but are hopeful of being able to share an update on their position in the very near future.	

M.2. Local Authorities s43

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
7	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils would expect further details to be provided in the Environmental Statement on the reasoning behind why visual receptors are scoped out.	N/A	A full review of potential receptors has been undertaken for the Landscape and Visual Impact Assessment as part of the Environmental Statement, and justification is provided for those then scoped out from further assessment.	
9	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils note that the Preliminary Environmental Information Report refers to a Health Impact Assessment and Equalities Impact Assessment, which will be prepared separately, and, as such, it is expected that the population and human health Environmental Statement chapter will need to both reflect and inform these reports.	N/A	An Equality Impact Assessment has been produced for the Scheme and is referred to in the Population and Human Health chapter of the Environmental Statement. The requirement to produce a separate Health Impact Assessment has been reviewed and it has been concluded that such a document is not required for the Scheme. Instead of a separate Health Impact Assessment, the human health section of the Population and Human Health chapter has been expanded to: describe health characteristics in greater detail, including consideration of mental health data; use data analysis to identify and include relevant vulnerable groups within the health baseline; and strengthen the	

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					approach to consultation and engagement process and outcomes. Summary tables have been included to provide greater clarity in expressing the outcomes of the assessment and to better connect health outcomes with impacts.	
10	Gloucestershire County Council	Environment	There has been no geophysical survey or trial trenching in areas outside of the link road and a scheme of further investigation should be agreed to inform the Environmental Statement and proposed Archaeological Management Plan for mitigation outside the link road. It is recommended that a scheme for evaluative investigation of the remainder of the red line area be agreed with the County Archaeology Service. Whilst it is understood that some areas may not be accessible, the	N/A	Additional survey work has been undertaken for areas outside of the link road corridor, where access allows, and is included in the Environmental Statement. The Archaeological Management Plan includes approaches for areas inaccessible or otherwise unavailable in advance of the Environmental Statement to ensure the full consideration of the historic environment.	

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			Environmental Statement needs to provide an assessment of the significance of archaeology and the impact upon it over the entire route. This should include the areas of motorway access and exit slips (including the cropmark site HER 48027), the flood alleviation area and other ponds, proposed access routes off the A4019 and the widening of that road at the eastern end of the scheme, particularly in proximity to the fire station.			
11	Gloucestershire County Council	Environment	Historic England and District Conservation staff should also be consulted regarding potential impacts on designated heritage assets and their settings.	N/A	Assessments of significance are being conducted for the Environmental Statement, and Historic England and local conservation officers have been consulted. Initial responses have already been received from Historic England.	

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12	Gloucestershire County Council	Environment	The Preliminary Environmental Information Report is already out of date as although it mentions the geophysical survey of the Link Road site, it does not include that archaeological trial trenching has been completed in that area. The full report into the trial trenching is awaited, but it will form an important part of the evidence base for the Environment Statement as it should clarify the significance and extent of the archaeology there.	N/A	The results of the geophysical survey and trial trenching have been used to inform the assessments reported in the Environmental Statement.	
13	Gloucestershire County Council	Design	It is understood that Stagecoach will be providing a separate consultation response. However, we are aware that they have concerns that the Scheme provides no details or provision at this stage for bus priority measures. Given the importance	Yes	The Applicant is in regular discussions with Stagecoach and Gloucestershire County Council to ensure the design meets as much of the requirements for retaining current services and future proposals as possible. The consideration of bus priority measures into the design is ongoing, and further detail will be	The northern verge of the A4019 has been widened to allow for future bus lane provision from the fire station to Gallagher Junction. The right turn lane from A4019 westbound to North West Cheltenham (Elms Park) Allocated Site access changed to bus only. The entrance to Park & Ride is added to the west of the Safeguarded Site access

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			that bus services provide in encouraging non-car use, these are concerns that we echo, and it is imperative that bus priority measures are considered.		provided as part of Development Consent Order submission	junction to match the developer's design.
14	Gloucestershire County Council	Design	We are keen to understand how the needs of bus services have been considered in the lead up to this design of the Scheme, and where improvements can be included as part of Design Fix 3. Given there is a clear policy requirement to consider non-car modes, and that Gloucestershire County Council has declared a Climate Emergency, the Scheme should be considering bus priority measures. We would welcome discussions between Stagecoach, the Applicant, and the	Yes	The Applicant is in regular discussions with Stagecoach and Gloucestershire County Council to ensure the design meets as much of the requirements for retaining current services and future proposals as possible. The consideration of bus priority measures into the design is ongoing, and further detail will be provided as part of Development Consent Order submission.	The northern verge of the A4019 has been widened to allow for future bus lane provision from the fire station to Gallagher Junction. The right turn lane from A4019 westbound to North West Cheltenham (Elms Park) Allocated Site access changed to bus only. The entrance to Park and Ride is added to the west of the Safeguarded Site access junction to match the developer's design.

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			Highway Authority to determine the requirements for bus priority as part of the Scheme. Again, it is expected that details and justification of this will be provided as the Scheme moves towards Design Fix 3.			
15	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	It is noted that consultation with the Gloucestershire Council archaeological advisor is ongoing and has informed the production of the assessment within the Preliminary Environmental Information Report, including surveys undertaken to date. This is welcomed by the Joint Councils and the continuation of this consultation is recommended. Consultation with the Conservation Officers at Tewksbury Borough Council and Cheltenham Borough	N/A	Consultation with the county Archaeological Advisor is ongoing. Consultation with Tewkesbury Borough Council and Cheltenham Borough Council Conservation Officers has been included in the Environmental Statement assessment.	

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			Council is also recommended to inform proposals for mitigation of temporary and permanent impacts on the setting of listed buildings within the Boroughs.			
16	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils welcome the proposed approach of developing a robust programme of archaeological investigation and recording following an Archaeological Management Plan prepared in consultation with the local authority's archaeological advisor, to mitigate the impacts on buried archaeological remains. The awareness that any such Archaeological Management Plan should also take into account cumulative effects resulting from adjacent	N/A	Cumulative impacts on cultural heritage have been addressed in the Environmental Statement.	

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			<p>developments impacting on wider archaeological remains, such as the housing allocation sites at Fiddlers Green (OUA07) and at North West Cheltenham as part of the Tewkesbury Borough Joint Core Strategy, is welcomed. It is recommended and anticipated that the findings of any current or ongoing archaeological investigations within the area around the Scheme, for example in relation to nearby housing developments, will be taken into account in developing the proposed Archaeological Management Plan. The Joint Councils also agree with the proposals for permanent impacts on the setting of heritage assets to be mitigated through design and</p>			

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			landscaping and temporary impacts on the setting of heritage assets during construction to be mitigated through the Construction Environmental Management Plan.			
17	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils note that the Preliminary Environmental Information Report assessment does not include an assessment of the proposed lighting columns. The Environmental Statement should include these in the assessment if they will be visible from the receptors in both the day and night and outline the effects these will have and any mitigation measures needed to reduce the effects.	N/A	Lighting columns are mentioned in the Preliminary Environmental Information Report and are included in the Landscape and Visual Impact Assessment.	
19	Gloucestershire County Council	Environment	Gloucestershire County Council, as a	N/A	The results of the geotechnical investigations have informed the	

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			statutory consultee, is unclear as to the potential of the area (particularly the drift geology) to produce evidence of early prehistoric material and would like to see that this has been assessed by a relevant specialist for the Environmental Statement. Perhaps some site assessment would be beneficial if combined with engineering geotechnical investigations.		assessments for the Environmental Statement. Geoarchaeological assessment undertaken for the trial trenching has also been used to inform the potential for early prehistoric remains. However, initial findings do not suggest a strong likelihood of such remains.	
20	Gloucestershire County Council	Environment	There should be early discussion regarding the Development Consent Order requirement necessary to secure the production and implementation of the Archaeological Management Plan.	N/A	The Archaeological Management Plan forms part of the Register of Environmental Actions and Commitments, which is a requirement of the Development Consent Order.	
21	Cheltenham Borough Council	Environment	The Joint Councils suggest that the Environmental	N/A	The baseline data has been verified and updated as appropriate within the Environmental Statement. This	

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	and Tewkesbury Borough Council		Statement consider the potential effects of the Scheme on a series of wider health determinants that are considered relevant to the Scheme. This should include some wider health determinants additional to those considered in the Preliminary Environmental Information Report, such as "access to private property and housing," "active travel," "work and training," and "landscape and visual amenity," noting that physical impacts and effects from the Scheme will also potentially affect health.		includes a review of availability of Census 2021 data: ward boundaries and proportionate review of health statistics. It should also be noted that the human health section of the Population and Human Health chapter has been expanded, allowing (within its methodology) for the fuller consideration of health priorities and wider health determinants, as expressed within the Joint Strategic Needs Assessment (due to the objectives led approach to Health Impacts Assessment).	
22	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils would also expect the Environmental Statement to consider the distribution of effects within the	N/A	The Design Manual for Roads and Bridges LA 112 methodology has been followed in developing the baseline information for the Environmental Statement. The baseline data has been verified and	

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			<p>affected population. This should include identifying the vulnerable groups present in the study area and assessing the potential effects of the Scheme on these vulnerable groups (typical vulnerable groups that are likely to be present in the study area include families with children and adolescents; people who are physically or mentally disadvantaged e.g. elderly people, people with physical and/or disabilities, people with other health problems or impairments; people of certain ethnicity and/or gender, and people who are materially disadvantaged e.g. people on a low income, people without access to a car, unemployed people) who will be more susceptible to change</p>		<p>updated as appropriate within the Environmental Statement. This includes a review of the availability of Census 2021 data; ward boundaries, and a proportionate review of health statistics. A separate Equality Impact Assessment has been produced, and the human health section of the Population and Human Health chapter expanded, allowing (within its methodology) for the fuller consideration of specific groups, health priorities, and wider health determinants, as expressed within the Joint Strategic Needs Assessment (due to the objectives led approach to HIA).</p>	

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			to the baseline conditions and any effects arising from the Scheme.			
23	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils would expect the Environmental Statement to be clearer and more prescriptive when assessing and describing health impacts and health outcomes rather than just providing a general direction of change. For example, for air pollution, an increase in dust and vehicle emissions associated with construction activities and increased vehicle movements tends to predominantly relate to physical health outcomes that can change mortality rates and the burden of disease within the exposed population.	N/A	The Human Health element of the Environmental Statement has been developed further in accordance with LA112. Design Manual for Roads and Bridges LA 112 does not require significance to be assigned to human health outcomes; therefore, no methodology is provided for this aspect of the chapter. Further detail has been added to explain health outcomes and consideration has been given to potential measures that could address identified negative health outcomes.	

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24	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils acknowledge that the Preliminary Environmental Information Report is a preliminary assessment and are generally satisfied with the approach undertaken. However, the Joint Councils recommend that the approach/assessment methodology for human health in the Environmental Statement needs to be undertaken in accordance with Design Manual for Roads and Bridges LA112 guidance and consistently applied throughout the chapter, including determining the potential and residual effects of the Scheme.	N/A	The Human Health element of the Environmental Statement has been developed further, in accordance with LA 112. Design Manual for Roads and Bridges LA112 does not require significance to be assigned to human health outcomes, and no methodology is provided for this aspect of the chapter. Consideration has been given to potential measures that could address identified negative health outcomes.	
25	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The population element of the Population and Human Health chapter of the Preliminary	N/A	The items referenced in the response form part of the Design Manual for Roads and Bridges LA 104 (para. 3.9). They have already been considered within the outputs	

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			<p>Environmental Information Report generally follows the required approach set out in the Design Manual for Roads and Bridges LA112. However, the Joint Councils query some of the assessment approaches and gradings outlined in the Preliminary Environmental Information Report. The Joint Councils note that consistency and clarity need to be provided in the Environmental Statement with regard to temporary and permanent effects, which should be addressed separately, as well as clarity around the consideration of Scheme design/embedded mitigation, versus additional mitigation, which needs to be considered when</p>		<p>to date; however, are expressed more explicitly within the Environmental Statement. The Environmental Statement also includes consideration of the potential effects, mitigation and residual effects for the population element of the chapter (as per Design Manual for Roads and Bridges MRB LA112), but this is not a requirement for human health. Further detail has been added to explain health outcomes and consideration has been given to potential measures that could address negative health outcomes.</p>	

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			assessing residual effects.			
28	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils would expect that for both the human health and population elements of the assessment, all assessment findings should state the direction of change (positive, negative, or neutral) but also the relationship (direct or indirect), frequency and duration (short-term, medium-term, long-term, temporary or permanent) and permanence (i.e. reversible or irreversible).	N/A	The items referenced in the response form part of Design Manual for Roads and Bridges LA 104 (para. 3.9). They have already been considered within the outputs to date; however, have been expressed more explicitly in the Environmental Statement. .	
30	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The assessment approach for describing the impacts is adequate for this stage. However, the Joint Councils expect the methodology outlined in the Preliminary Environmental	N/A	The methodology for the Landscape and Visual Impact Assessment has followed that set out in the Preliminary Environmental Information Report (Design Manual for Roads and Bridges LA107) to identify the sensitivity, magnitude of impact, and significance of effects for all receptors. Timescales assumed for	

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			Information Report (Design Manual for Roads and Bridges LA 107) to be followed in the Environmental Statement and the assessment of effects should follow the criteria for the identification of the sensitivity and magnitude of impacts to determine the significance of the effects and ensure these are outlined. The methodology should also define the terms used to describe the length of time the effects will occur until any mitigation becomes effective, e.g. how long is 'long term'.		mitigation and assessment have also been set out.	
31	Gloucestershire County Council	Environment	There is a high probability of significant waterlogged remains being present in this area, which should be assessed in the Environmental Statement and, in due	N/A	The potential for waterlogged deposits has been identified and evaluated during trial trenching activities. Results from the analysis have informed the Environmental Statement and the Historic England science advisor approached during the development of the	

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			course, arrangements for its investigation and recording should be agreed with the Historic England Science Advisor and included in the Archaeological Management Plan.		Archaeological Management Plan where appropriate.	
32	Gloucestershire County Council	Design	It is currently unclear if any compounds, haul roads, or other landscaping and engineering will be required outside of the current red line, but the impacts of these developments also need to be understood. The evaluation reports into the trial trenching of the West of Cheltenham (Cyber Park) site should be reviewed to assess any impacts that may occur on the south side of the B4636 (Old Cheltenham Road).	N/a	The Development Consent Order Limits include all working space, site compounds, haul roads, and other landscaping and engineering associated with this application. At present, there is no work proposed south of B4634 (Old Gloucester Road) except the minor works required for the new junction with the West Cheltenham Link Road and is included in the Development Consent Order Limits.	
33	Gloucestershire County Council	Environment	The Preliminary Environmental	N/A	The results of the geophysical survey and trial trenching have	

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			Information Report underestimates the potential of the area for early medieval (Anglo-Saxon) archaeology. This is probably due to the lack of a final report for the site that now houses the fire station, which, together with the nearby All Saints Academy excavation, indicates a high potential for further early medieval remains in the area. The A4019 follows a spur of Cheltenham Sand and Gravel, all of which may well share a similarly high potential for currently unknown archaeology, including the continuation of known Iron Age, Roman and early medieval activity.		informed the assessments undertaken for the Environmental Statement, and more information has been provided in the Environmental Statement.	
34	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils note on the landscape design plans that no tree planting along the southern verge of the	No	There are a few existing trees along this section, with hedgerow being the main feature, allowing views out from (and towards) the existing road. The idea of the landscape	

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			A4019 between Cooks Lane and Homecroft Drive is identified. The Joint Councils would recommend a greater amount of landscape screening to be provided in this section to mitigate effects on visual receptors located in the southeast, south, and southwest. The current mitigation would potentially allow open views of the road along this section. The assessment in the Preliminary Environmental Information Report suggests effects will not be significant in the long term. However, this assumes that successful tree planting would be provided and maintained along this southern verge.		design was to retain this openness. Planting around the attenuation basin close to the fire station would restrict close proximity views for residential properties. The landscape design for the Scheme has been reviewed though and no further changes have been made in this section in line with the overall landscape design for the Scheme.	
35	Cheltenham Borough Council	Environment	The Joint Councils note that there are no heritage assets	N/A	These matters have been addressed in the Environmental Statement.	

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	and Tewkesbury Borough Council		located within Cheltenham Borough that would be affected by the proposed work. However, there are several listed buildings located within Tewkesbury District that might be affected by the proposed works and assessment of these should be included in the Environmental Statement. It is noted that a geophysical survey has informed the assessment within the Preliminary Environmental Information Report and there is a recommendation for an Archaeological Management Plan to be developed. The Preliminary Environmental Information Report states that the Archaeological Management Plan will be developed in consultation with the			

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			Gloucestershire County Council archaeological advisor and Historic England and the Joint Councils welcome this approach.			
36	Gloucestershire County Council	Environment	The work on the potential ecological impact of the various highway improvements has been reassuringly detailed so far. The biodiversity resources being scoped in as being potentially adversely impacted in the Preliminary Environmental Information Report seem correct. It is acknowledged that more survey work in the coming months will be carried out to fully inform the Environmental Statement for the Development Consent Order process. For this reason, final assessments, particularly for bats,	N/A	These matters have been addressed in the Environmental Statement.	

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			dormice, and reptiles, are not possible. Generally, though, the mitigation listed looks appropriate but may need to vary a little when all survey information is in, including some pre-construction surveys at key locations/times, e.g., for badgers. The very useful table summary of impacts and effects from construction and operation of the Scheme will need reviewing in connection with late breaking survey information as well as any late changes in scheme design nearer to the Development Consent Order stage.			
37	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils note that the assessment of landscape character does not include any reference to the tranquilly of the	N/A	Tranquillity of the area has been considered within the landscape character section of the Landscape and Visual Impact Assessment.	

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			landscape and suggest that this should be undertaken and included in the Environmental Statement to understand the current situation and how the Scheme may affect this.			
43	Cheltenham Borough Council and Tewkesbury Borough Council	Active travel	The Joint Councils welcome the proposed widening of the A4019 and the provision of a separate, dedicated cycle track and footway lanes for non-motorised traffic. However, they would expect further information articulating the opportunities the Scheme brings for modal shift and the aid to a behavioural shift to promote more sustainable and less polluting methods of transport. To align with local strategies such as Cheltenham Borough Council's Connecting	N/A	This comment is noted. The 'Strategic Connections' section of the Connecting Cheltenham strategy report states that "improving both motorway access capacity and resilience will support the delivery of these areas of development whilst helping mitigate their impact on the existing urban area." Within the corridor-based remit of a highway scheme it is felt that the proposed walking and cycling facilities will provide good quality off-road connections. For cyclists, these are intended to encourage the less confident cyclists that are needed to deliver the aims of Connecting Cheltenham.	

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			Cheltenham report (2019), more details need to be provided to explain how the use of the improved network will encourage shorter journeys and build in mechanisms to enable and encourage sustainable transport, particularly measures that allow people to use active and collective forms of transport to travel to work.			
73	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Preliminary Environment Information Report gives a brief overview of the key aspirations for the environmental design which the Joint Councils welcome. The Joint Councils would expect to see further details on this provided in the Environment Statement, including reference to Biodiversity Net Gain and whether and how	N/A	Details have been provided as part of the Environmental Statement including the assessment undertaken of the biodiversity net gain achieved by the Scheme.	

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			the Scheme is looking to achieve this.			
81	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Scheme alternatives and option selection process is outlined clearly in the Preliminary Environmental Information Report. However, the Joint Councils would expect to see further details on any environmental considerations that were included in the option selection processing the Environmental Statement and how this influenced the outcome.	N/A	Detail is provided as part of the Environmental Statement. The selection of options through the design process included consideration of the impacts to the environment.	
83	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils note the latest versions of assessment guidance documents, emission datasets and other assessment tools at the time of the assessment have been used. It is noted that a revised emission	N/A	The most recent air quality tools have been adopted through the Environmental Statement assessment work.	

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			database has been issued since the assessment was undertaken. However, the update does not result in changes to emission factors for nitrogen dioxide (NO ₂) and particulate matter PM ₁₀ , which are the key pollutants included in the air quality assessment. The updates are for carbon dioxide only.			
84	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils note that construction traffic was not considered in the Preliminary Environmental Information Report, as construction vehicle numbers were not yet known. It should be confirmed if further consideration would be given to changes in traffic due to traffic management measures during construction, as well as the number of	N/A	The methodology in LA105 has been used to update the construction information for the Environmental Statement.	

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			construction vehicles, although it is noted that the planned construction period is expected to be 18 months. This is under two years and on this basis, further consideration of changes to traffic in the construction phase would not be required in accordance with Design Manual for Roads and Bridges LA 105 guidance.			
86	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The baseline noise surveys were undertaken in May and June of 2021 following COVID-19 lockdown restrictions, as it was considered to be representative of an almost 'back to normal' situation. The Joint Councils suggest that additional baseline surveys may be required if it is judged that the traffic circumstances have changed significantly	N/A	The validity of baseline noise survey data was considered for the Environmental Statement. The noise surveys undertaken were considered to be appropriate and further measurements not to be required. No further measurements have been undertaken.	

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			since May and June of 2021 at the time of preparing the Environmental Statement.			
87	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Preliminary Environmental Information Report includes a high-level construction noise assessment, which highlights potential areas that might be affected by construction noise from the Scheme. It goes on to state that the Environmental Statement will include a full BS 5228-1:2009+A1:201 assessment, including ambient noise environment at the closest receptors and distance to receptors construction methodology, including proposed equipment, work hours and duration. The proposed more detailed assessment	N/A	The construction assessment is provided in the Environmental Statement.	

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			for the Environmental Statement is welcomed by the Joint Councils. The Joint Councils would also expect the detailed construction noise assessment to provide more Scheme specific best practical means mitigation measures, than those outlined in the Preliminary Environmental Information Report.			
89	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils would expect the Environmental Statement to identify all properties that are predicted to have a residual significant adverse effect and which may need to be considered for noise insulation measures, or temporary rehousing of occupiers.	N/A	These matters have been addressed in the Environmental Statement.	
91	Cheltenham Borough Council	Environment	Biodiversity Net Gain is mentioned in the Preliminary	N/A	The Scheme has an objective of achieving a net gain in biodiversity, and has assessed the preliminary	

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	and Tewkesbury Borough Council		<p>Environmental Information Report. The text mentions net gain targets and ensuring Biodiversity Net Gain but there is no explanation within the Biodiversity chapter about whether the project is committing to achieving Biodiversity Net Gain, or what the intended target is. The Joint Councils would expect this to be clarified, either in the Environmental Scheme or elsewhere. It is also noted that a biodiversity using metric 3.0 is listed as part of the next steps and it is expected that this would be submitted with the Environmental Statement. The Joint Councils preference is for Biodiversity Net Gain to be achieved on site, as an integral component of the Scheme. If this cannot</p>		<p>Scheme design using the Department for Environment, Food and Rural Affairs' v3.0 metric. Details of the assessment undertaken are reported in the Environmental Statement, with the results showing a net gain in biodiversity for each of the habitat types relevant to the Scheme area.</p>	

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			be achieved, then we would request an early conversation about the proposals as in the spirit of the Environment Act 2021, this should be met on or as close to the site as possible and bring benefit to the local biodiversity and communities.			
93	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The methodology of assessment is in line with Design Manual for Roads and Bridges LA 108, which is considered appropriate for a road scheme. Limitations to baseline data collection and potential impacts of these on the assessment are set out. The Joint Councils would expect these to be reviewed and refined for the Environmental Statement, taking into account any additional survey data collected	N/A	These matters have been addressed and set out in the Environmental Statement.	

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			and any changes to the Scheme.			
94	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	Detailed terrestrial invertebrate surveys have not been carried out, but no explicit explanation for excluding them has been provided in the Preliminary Environmental Information Report. This states that it is considered that priority assemblages of terrestrial invertebrates are unlikely, based on the habitat types. The Joint Councils expect the Environmental Statement to provide a clear explanation for the exclusion of detailed surveys and to set out any potential limitations to the assessment/mitigation proposals as a result of this.	N/A	The presence of notable terrestrial invertebrate assemblages was ruled out within most of the study area due to poor habitat. The exception was traditional orchard habitat, which was assumed to support noble chafer and accorded a value of County importance on a precautionary basis. Noble chafer was then scoped out of the assessment because none of the traditional orchards will be affected by the Scheme. This detail is included within the Environmental Statement.	
95	Cheltenham Borough Council	Environment	The bat survey report includes data from 2019 and 2020 only. It	N/A	These matters are addressed in the Environmental Statement. Further advanced licence bat surveys were	

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	and Tewkesbury Borough Council		is noted from the Preliminary Environmental Information Report that further bat survey work continued in 2021 and analysis of data is ongoing and will be reported on within the Environmental Statement. A footnote explains that advanced license bat surveys were proposed for Bechstein's batin 2021, but were subject to limitations and may, or may not, be carried out in 2022. If these surveys are not carried out, the Environmental Statement should set out an explanation about why these proposed surveys have been scoped out.		not undertaken. Advanced licence bat surveys were only undertaken in May 2021. A second round in 2021 was not undertaken as originally intended, nor did were any undertaken in 2022. A full justification of this has been set out in the Bat Technical Appendix, submitted as part of the Environmental Statement. It is also within the updated Bat Survey Protocol, also submitted as part of the Environmental Survey, and will be discussed with Natural England (meeting in October 2022).	
96	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Biodiversity chapter of the Preliminary Environmental Information Report appropriately considers the age of	N/A	These matters have been addressed and set out in the Environmental Statement.	

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			survey data and notes that some updates to the extended Phase 1 habitat survey in some areas will be carried out, to verify the baseline conditions prior to submission of the Environmental Statement and determine whether any conditions have changed. This approach is acceptable. It is expected that the age of all other survey data will be considered, and any limitations set out in the Environmental Statement, along with any assumptions that have been made in the assessment in relation to this.			
97	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Biodiversity chapter sets out habitat loss and creation. This includes terrestrial (ha and linear m) and aquatic habitats. The chapter states there is a	N/A	For the habitat that will be lost, the majority of these areas are of lower value for biodiversity, such as improved grassland/arable habitats. The habitat creation proposed will offset effects of habitat loss by providing an increase in area of the more valuable habitats. For	

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			<p>permanent loss of 69ha, and a temporary loss of 32ha. It states that habitat creation will offset the effects of habitat loss and fragmentation, with a potential minor beneficial effect on habitats stated during operation. The information in the Preliminary Environmental Information Report does not explain/evidence how the proposals offset these effects, particularly as the numbers in the table indicate an overall loss of terrestrial habitats and there is no explanation regarding this. The Environmental Statement should consider the best way to present the overall mitigation plan and habitat loss/creation in relation to terrestrial and aquatic habitats. If</p>		<p>example, 8.74 ha of plantation woodland will be removed, and 13.5 ha of woodland will be created; the majority of grassland habitat to be removed is of low nature conservation value, and 21.16 ha of species-rich grassland and grassland with bulbs will be created. These matters are addressed fully in the Environmental Statement.</p>	

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			there is an overall net loss of terrestrial or aquatic habitat, the Environmental Statement will need to include further explanation/evidence about how the habitat creation proposals offset the effects of this loss.			
100	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils welcome the National Highway's Low Nutrient Grassland policy being applied during the design of this road scheme and road verge habitats. The Environmental Statement (and/or accompanying landscape and ecology management plan) should explain the proposed aims and objectives of grassland design for both the road verge habitats and other areas. Descriptions such as 'grassland with bulbs' require more detail to	N/A	This has been noted and addressed in the Environmental Statement and accompanying documents.	

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			explain their value for biodiversity.			
101	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The preliminary assessment indicates a significant residual effect on bats may remain as a result of the Scheme, even when the proposed mitigation is taken into account. It is worth clarifying whether this relates to all species of bats. It is understood that the assessment will be refined following analysis of 2021 (and potentially 2022) survey data and the development of mitigation proposals. Additional potential mitigation measures are outlined however, it is not clear from the text if the inclusion of these in the mitigation plan would reduce the residual significance of the effect on bats. Further mitigation or compensation measures to reduce	Yes	The 2021 survey data has been analysed. We have concluded that additional mitigation measures are required. These additional measures include an underpass and structures for roosting bats to provide mitigation for the loss of roosts in the construction of the Scheme. Further detail is included in the Environmental Statement.	An underpass underneath the A4019 is included, to provide mitigation for bats in allowing them to pass underneath the widened A4019. Two structures for roosting bats will be created to provide mitigation for the loss of roosts in the construction of the Scheme.

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			the significance of effects would be welcomed.			
102	Cheltenham Borough Council and Tewkesbury Borough Council	Design	The Joint Councils would like to understand if the alder trees adjacent to the road alongside the Gallagher Retail Park which form an important visual feature at this gateway into Cheltenham will be impacted as it is not clear in the consultation documents.	n/a	The Scheme design requires the majority of these trees to be removed to allow additional lane at Gallagher Junction for capacity reasons.	
103	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Preliminary Environmental Information Report states that a landscape and ecology management plan will be developed. This plan is critical to ensure the appropriate management of habitats created/reinstated as part of the Scheme design that the impact assessment relies	N/A	This has been considered within the first iteration of the Environmental Management Plan, which forms part of the Development Consent Order application. Further iterations of the Environmental Management Plan will be produced as the scheme progresses.	

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			upon. This plan should be submitted with the Environmental Statement as part of the Development Consent Order application.			
106	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The proposal for a monitoring plan is welcomed. This should be committed to within the Environmental Statement, particularly where potentially significant effects have been identified and where there is uncertainty on the success of mitigation. Contingencies to rectify mitigation should also be included.	N/A	These matters have been addressed in the Environmental Statement. Any monitoring required for European Protected Species will also be agreed with Natural England as part of the licensing process.	
108	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils agree that the Preliminary Environmental Information Report provides an appropriate assessment of the expected impacts on	N/A	The Environmental Statement includes a baseline water quality assessment using the National Highways Water Risk Assessment Tool, which provides predicted dissolved copper and dissolved zinc concentrations within the highway runoff. One of the inputs is the ambient background dissolved	

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			<p>surface water and groundwater quality during construction and operation. It is noted that no data has been assessed at this stage to determine baseline water quality conditions. However, a summary of the Water Framework Directive Status is provided for Water Framework Directive water bodies. A summary of water quality data from available sources and the ground investigation would be expected to be provided in the Environmental Statement stage (e.g. Environment Agency monitoring data).</p>		<p>copper concentration of the watercourse receiving the highway runoff. This data is reported in the Environmental Statement.</p>	
109	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	<p>The Preliminary Environmental Information Report outlines that a preliminary Highways Agency Water Risk Assessment Tool assessment has been</p>	N/A	<p>This has been included in the updated assessment using the Highways Agency Water Risk Assessment Tool.</p>	

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			undertaken, based on available information at this stage. However, it is noted that no ambient background concentrations for copper or water hardness data were reported as part of the assessment methodology. This should be applied at the next stage of the assessment to ensure appropriate mitigation measures are accounted for.			
111	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils would expect the surface water quality assessment to include impacts from salt and gritting activities within the Environmental Statement.	N/A	The Design Manual for Roads and Bridges LA 113 does not include any specific guidance for assessing the impact from salt and gritting on the water environment. Reference is made in the Environmental Statement to the potential impact salt and gritting can have on the water environment by including the following statement, but a specific assessment has not been undertaken: Other than heavy metals and nutrients, the significant dissolved constituent of highway runoff in the UK is sodium chloride, applied as de-icing salt during the	

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					winter. Sodium chloride can cause damage to vegetation and can potentially trigger the release of accumulated nutrients and heavy metals adsorbed to the suspended solids into solution.	
112	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Preliminary Environmental Information Report states that the National River Flow Archive has been used to provide an estimate of flow on the River Chelt. The Joint Councils recommended that at the next stage of assessment, flow estimates are either amended based on catchment area scaling, or estimated using Low Flow Estimates modelling (or equivalent).	N/A	The Low Flows Estimation Tool has been used in the updated assessment.	
113	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils note the use of the conservative assumption of using 0.001m ³ /s results in a requirement to consider the receptor	N/A	Following the Low Flows Estimation, none of the receptors have flows equal to or less than 0.001m ³ /s. Therefore, there is no requirement for a groundwater assessment.	

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			as soakaway and therefore a groundwater assessment will be required. The Joint Council recommend in the next stage of the assessment that flow estimates based on catchment area scaling or Low Flows modelling are considered. If the 0.001m ³ /s is retained, a judgement should be made regarding the requirement for a groundwater assessment.			
114	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils note that at the time of writing of the Preliminary Environmental Information Report, site-specific groundwater conditions were not available such that an informed assessment of impact to groundwater levels and flow could be	N/A	A detailed impact assessment including site-specific ground investigation data is included in the Environmental Statement.	

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			completed. It is expected that a detailed impact assessment will be included in the Environmental Statement.			
115	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Preliminary Environmental Information Report states that as well as increases in impervious areas, changing discharge outfall locations for drainage runs may change the volume of runoff entering watercourses and this should be reviewed and assessed during design development. It states that without mitigation the Scheme will displace floodwater and impact on its "neighbours". The Joint Councils would expect to see further details on which neighbours this refers to (i.e. Farmland, individual dwellings,	N/A	The effects of changing discharge outfall locations have been considered as part of the design development. Without mitigation the Scheme would impact on the farmland east of the West Cheltenham Link Road. Increases in flood depth against the M5 motorway are also predicted. The Scheme modelling report and hydraulic model has been issued to the Environment Agency (March 2022). These items support the Flood Risk Assessment and Preliminary Environmental Information Report and include data on the impacts should no mitigation be implemented (flood culverts, bridge, flood storage and compensatory floodplain).	

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			businesses) and what the extent is of changes to flood depths/area of these receptors within the Environmental Statement.			
116	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Preliminary Environmental Information Report outlines that compensatory floodplain volumes and locations have been identified. However, further details on what has been done to ensure high confidence in the viability of these areas in terms of ground conditions and like-for-like vertical profile of storage volumes are required.	N/A	The identified flood storage has been subject to detailed ground investigation and testing. The interpretation of this is such that the basin would not suffer from groundwater intrusion and thus retain the required volume for floodwater. There may be some isolated and localised intrusion, or infiltration through a gravel lens found near the southern excavated edge of the flood storage area. This is likely to be of negligible flow and would pass straight through the storage area and out through the Piffs Elm culvert. The basin would not permit infiltration of stored water and instead all outflows will need to be through the Piffs Elm culvert. The storage area is not intended to provide re-provision of floodplain on a level for level basis as the Junction does not displace water on a level for level basis -it is hydraulically disconnected from the	

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					River Chelt. The compensatory floodplain by the West Cheltenham Link Road will be free draining and discharge all temporarily stored water in the same manner that the existing floodplain does today: any residual standing water will not be increased. Similarly, at the flood storage area the basin will fully drain after a flood event, with the exception of any permanent body of water purposefully retained for biodiversity or related benefit.	
117	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Preliminary Environmental Information Report recognises the necessity of a Right to Flood agreement. The Joint Councils expect that the extent of land acquired for the Scheme construction period should ensure it takes account of requirements for land to facilitate construction of storage areas as well as the final extents of the completed Scheme.	N/A	We agree that temporary, or early construction of permanent flood storage needs to be in place to offset any construction stage impacts on the floodplain. The temporary construction phase needs to be understood by the contractor to minimise risk during the build stage. The Buildability Report provides some further information on how this Scheme might be constructed, and the relevant contents of the buildability report have been included in the Environmental Statement.	

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118	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils have noted some inconsistency in the flood risk assessment and so would expect clarification of this assessment.	N/A	The Preliminary Environmental Information Report reflects the interim assessment at the time of writing based on the flood modelling prior to that assessment. Since that time, the design has been updated along with the flood modelling, to reduce and remove the moderate adverse impact at Elmstone Business Park. The Scheme modelling report and hydraulic model has been issued to the Environment Agency (March 2022). These items support the Flood Risk Assessment and the Environmental Statement.	
119	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils acknowledge this is a preliminary Flood Risk Assessment and would expect more details included in the updated Flood Risk Assessment on the volumetric calculations of compensatory floodplain storage with respect to displaced flood water, the timing of peak flows and volumes and revisions with the updated (lower) climate change	N/A	The updated Baseline model and accompanying report, and the Scheme modelling report have been issued to the Environment Agency (March 2022). These documents support the Flood Risk Assessment and Preliminary Environmental Information Report and incorporate the July 2021 climate change guidance, as well as more information on the displacement of floodwater and compensatory storage/floodplain. This information is included in the latest Flood Risk Assessment	

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			allowances applied to the modelling.		Report, available in Environmental Statement (Appendix 8.1).	
120	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils would expect to see confirmation of whether the proposed compensatory flood storage falls within the scope of the Reservoirs Act and if so, that an All Reservoir Panel Engineer will be engaged.	N/A	The project has engaged an All Reservoirs Panel Engineer to advise the preliminary design with regards to the large flood storage area and raising of road embankments. It is understood that the slip road and A4019 improvements at Junction 10 do come under the remit of the Reservoirs Act 1975.	
121	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Preliminary Environmental Information Report refers to the Environmental Permitting Regulations (2016) which is welcomed however, the Joint Councils agree it would be useful to make the linkage between these regulations and Water Framework Directive as one of the EU Directives referred to is the Water Framework Directive	N/A	These matters have been addressed in the Environmental Statement, where a connection will be made between the Environmental Permitting Regulations (2016) and Water Framework Directive as one of the EU Directives.	

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			and is therefore, key to permitting.			
123	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Preliminary Environmental Information Report indicates the impacts of the attenuation basins, flood compensation areas and temporary works on agricultural soils will be covered in a later stage of the Environmental Impact Assessment as their location/extent is not finalised. The Joint Councils would expect that these are assessed along with the necessary agricultural surveys/sampling in these areas and that the Environmental Statement will include this data.	N/A	The impacts on attenuation basins, flood compensation areas and temporary land take is contained in the Environmental Statement. Agricultural surveys have been undertaken and are also reported within the Environmental Statement.	
124	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils would expect to see further details of the extent of surface water run-off to be	N/A	As stated in the guidance (LA 113) the Highways Agency Water Risk Assessment Tool is used to predict whether the risk to the water environment from road runoff is	

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			contaminated (e.g. with hydrocarbons) and how will this be mitigated in the Environmental Statement. Natural storage solutions in terms of swales would be preferred and welcomed, over and above hard landscaped proposals.		acceptable. The concentrations of soluble pollutants and sediment bound pollutants (which includes hydrocarbons) is calculated within the Highways Agency Water Risk Assessment Tool and the results presented in the Environmental Statement as Pass or Fail. The details of exact levels of contamination will only be presented for annual average concentrations of dissolved copper and dissolved zinc. Where the HEWRAT indicates a fail, mitigation will be proposed, and treatment efficiencies (taken from Design Manual for Roads and Bridges CG 501) applied to the HEWRAT to ensure the level of treatment is adequate (shown by a pass in the HEWRAT). The drainage strategy provides information on the proposed mitigation, and this is summarised in the Environmental Statement.	
125	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils note that there is no mention of whether or not any permitted/licensed processes (e.g. IPPCs, COMAH, etc) are within 500m of the	N/A	Environmental permit data is available for the Scheme. These are included in the Environmental Statement.	

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			Scheme. If this is because there are none within the boundary, the Joint Councils would welcome this confirmation in the Environmental Statement.			
126	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Preliminary Environmental Information Report provides no mention of historical ground investigation reports, or whether any search of the local authority records, or request for information, have been undertaken. The Joint Councils would welcome consultation with Environmental Health Officers and would expect confirmation in the Environmental Statement as to whether the planning portal was reviewed to identify any ground investigation reports on, or in close	N/A	A search of the ground investigation reports on the planning portal has been undertaken and the details reported in the Environmental Statement, together with the findings of the Scheme specific ground investigation. We have been speaking with the relevant Environmental Health Officers.	

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			proximity to the Scheme boundary, particularly in the vicinity of the Violet Villa landfill. If reports do exist, then this data should be used to inform the baseline.			
128	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils recommend referring to and explaining the EU List of Waste and its transposition into UK law within the planning policy section of the Environmental Statement. This is the key document that implements waste coding and also takes precedence in some cases on hazardous waste thresholds and therefore, is recommended to be included.	N/A	The EU List of Waste and its transposition into UK law has been included within the planning policy section of the Environmental Statement.	
130	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Preliminary Environmental Information Report outlines an assumption the waste will all be primarily aggregate.	N/A	The principal contractor would be expected to source as much as possible from recycled aggregate. More details are set out in the Environmental Statement.	

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			The Joint Councils suggest that there is likely to be sufficient resource in the aggregate market for recycled aggregate products, however, if it has to be primary, the Joint Councils suggest a justification for this be provided within the Environmental Statement.			
131	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils note that throughout construction, waste would be generated and require disposal. The Joint Councils would expect the waste hierarchy would be applied to avoid disposal and recommends this is undertaken.	N/A	The Environmental Statement sets out details on how waste will be generated and managed, not disposed following the waste hierarchy.	
132	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils welcome the mitigation measures in the Preliminary Environmental Information Report however, further	N/A	Mitigation is included in the Environmental Statement . There will be more detailed information once a principal contractor is appointed to advise on specific mitigation measures.	

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			details and measures should be included in the Environmental Statement. For example it could be expanded to cover the beneficial use of wastes, with the inclusion of looking at restoration projects or capping at permitted waste facilities. This could also include treatment, especially for aspects such as soils, top-soils, green waste and aggregate, along with the recovery of ferrous and non-ferrous materials for treatment (shredding) and recycling.			
135	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils note that the Scheme will contribute 114,207 tCO ₂ e net emissions towards the UK Carbon Budgets as far as 2037 and that it is identified that the Scheme will not therefore have a	N/A	Details on significance is provided within the Environmental Statement. It should be noted that significance is determined primarily through whether the Scheme will materially impact the ability for the UK to meet its carbon reduction targets. The Applicant will continue to work with project stakeholders, including National Highways, to	

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			significant effect on climate. The Joint Councils would expect to see more details on how 'significant' is defined in the Environmental Statement.		ensure our approach is consistent with other schemes and relevant legislation.	
136	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils welcome the mitigation measures outlined in the Preliminary Environmental Information Report. However, they would expect to see further specific mitigation measures implemented as part of the Scheme.	N/A	Specific mitigation measures included as part of the Scheme are outlined in the Environmental Statement. Minimising Greenhouse Gas emissions through design is a core principle of PAS2080:2016 and evidence of this is provided within the Environmental Statement. PAS 2080 is a global standard for managing infrastructure carbon. The framework looks at the whole value chain, aiming to reduce carbon and reduce cost through more intelligent design, construction and use.	
137	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils note that no land use change assessment has been undertaken in the Preliminary Environmental Information Report due to data not being available. However,	N/A	This data has been used during the assessment undertaken for the Environmental Statement, with Land Use change included.	

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			they would welcome this being included in the Environmental Statement.			
138	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	Cheltenham Borough Council and Tewkesbury Borough Council declared a climate emergency in July 2019 and October 2019 respectively. Cheltenham Borough Council are currently working on a climate change pathway which is expected to go to Council for approval in February 2022. Cheltenham Borough Council has set an ambitious target of being net zero as an organisation and Borough by 2030, and Tewkesbury Borough Council has also committed to achieving carbon neutrality in Council services by 2030. Therefore, the Joint Councils would expect the Scheme to consider carbon	N/A	The scheme objectives include an aim to meet the requirements of climate change within the context of successfully unlocking the required growth in the area. As part of this, the Scheme will help to reduce carbon emissions when compared to a 'with development, but without scheme' scenario. The Environmental Statement includes an assessment of greenhouse gas emissions from the construction and the operation of the Scheme.	

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			emissions adequately and include innovative design and mitigation measures to reduce carbon emissions during the construction phase and ongoing operation of the Scheme. The Joint Councils suggest exploring if any opportunity that any residual highways land could have potential for wider climate change benefits i.e. location of renewable generation capacity.			
139	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The review of the Preliminary Environmental Information Report has found extensive reference to operational impacts of climate change to the Scheme and mitigation of those impacts. However, the operational impact of wildfires, both to road furniture/equipment and landscaping and	N/A	Assessment of wildfire impacts has been included within the Environmental Statement.	

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			safety hazards to end users should be added. The Joint Councils would expect the impact of heatwaves on human health and the potential impact of increased levels of humidity on electronic equipment with respect to increased corrosion rates, to be included in the Environmental Statement.			
140	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils are also keen to understand the direct relationship between traffic impacts and air quality of the Scheme. It is recommended that the Scheme should take into account the county-wide Gloucestershire Air Quality and Health Strategy. Additional traffic measures aiming to reduce congestion and source emissions should help	N/A	The Air Quality (AQ) assessment is limited to modelling the Scheme and provide comparison to relevant air quality threshold values. Mitigation measures which are embedded into the Scheme are incorporated into the modelled traffic data and traffic emission improvements (including nationally forecast uptake in electric vehicles) is integrated into the Department for Environment, Food and Rural Affairs future year emission forecasts. Wider traffic measures incorporated within the Scheme will be described in the Environmental Statement. We acknowledge the	

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			to reduce dangerous pollutant concentrations and reduce the risk of detrimental impact on health and wellbeing within the area.		Gloucestershire Air Quality and Health Strategy in the regional policy section in the Air Quality chapter of the Environmental Statement.	
146	Gloucestershire County Council	Environment	Whilst the submitted Preliminary Environmental Information Report does not outline that the final Environmental Statement will provide a chapter on Transport as a standalone chapter, it is crucial that this is provided in support of the Development Consent Order application. This should be supported by a comprehensive Transport Assessment which should inform the assessment within the Environmental Statement	N/A	A Transport Assessment has been submitted as part of the Development Consent Order. The Environmental Statement does not include a chapter on transport, as a separate transport assessment is being produced.	
148	Gloucestershire County Council	Environment	The National Networks National Policy Statement sets out the need for, and the	N/A	A Transport Assessment has been produced for the Scheme. This forms part of the Development Consent Order Application.	

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			<p>policies to deliver, nationally significant infrastructure projects on the national road network. It provides guidance for promoters of nationally significant infrastructure projects and is the basis for the examination by the Examining Authority. Of key concern is Chapter 5, page 87 which refers to the impact of schemes on the wider transport network. It requires applicants to have regard to the policies set out in local plans. It also requires applicants to consider reasonable opportunities to support other transport modes in developing infrastructure.</p>			
157	Gloucestershire County Council	Environment	<p>Gloucestershire's Cycle Network which seeks to deliver high quality, coherent, direct, safe,</p>	N/A	<p>The Scheme includes provision for active travel within the Scheme boundary whilst connecting into existing active travel infrastructure. Developers</p>	

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			comfortable and attractive cycle networks.		and Local Planning Authorities are anticipated to continue to develop complimentary facilities and provision beyond the Development Consent Order Limits.	
159	Gloucestershire County Council	Environment	This is not an exhaustive list of the policies contained within the Local Transport Plan, and as per the requirements of the National Planning Standards it is expected that the Applicant fully outlines how the Scheme fully aligns with the policies within the Local Transport Plan.	N/A	The Development Consent Order application contains further details on alignment with national and local polices.	
160	Gloucestershire County Council	Environment	Whilst we fully recognise the importance of the Scheme to deliver improvements to the highway network to help facilitate strategic housing allocations, there is a clear need that the scheme needs to fully integrate active travel opportunities where possible and	N/A	An active travel corridor is included as part of the design for the full extent of the Scheme.	

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			help to reduce CO2 emissions.			
161	Gloucestershire County Council	Environment	The Environment Bill is referenced in the biodiversity chapter of the Preliminary Environmental Information Report. These needs updating to the Environment Act with the relevant aspects being Sections 99 (Biodiversity Net Gain for Nationally Significant Infrastructure Projects) and 102 (biodiversity duty). It is pleasing to see reference to the Gloucestershire Highways Biodiversity Guidance, the fledgling Nature Recovery Network, and the county Tree Strategy . There is brief mention at the end of this part of the biodiversity chapter to the Gloucestershire Local Nature Partnership (GLNP). Usefully	N/A	These matters have been addressed in the Environmental Statement.	

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			reference should also be made in the Environmental Statement to the Partnership's current strategy "Growing Natural Success 2021-2024" and that Gloucestershire County Council is a key member.			
163	Gloucestershire County Council	Environment	The old Gloucestershire Biodiversity Action Plan shouldn't form a titled section in the Environmental Statement but instead a section on the Gloucestershire Local Nature Partnership should briefly reference the old Biodiversity Action Plan. This section should also refer to the new National Recovery Network and work currently underway to produce a mandatory Local Nature Recovery Strategy for	N/A	These matters are addressed in the Environmental Statement.	

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			Gloucestershire (which Gloucestershire County Council is likely to be named the responsible body to compile and publish by the end of 2023).			
164	Gloucestershire County Council	Environment	The objective to aim for a level of Biodiversity Net Gain which will be a mandatory requirement for such schemes in a few years' time (Environment Act Section 99 and Schedule 15) is welcomed. Retaining as much existing vegetation that has good value for biodiversity (its quality or location) is supported. Where necessary, mitigation to reduce risks to a low level must be effective, i.e. proven efficacy, carefully located/implemented and be sufficient. Going beyond pure	N/A	The Scheme has an objective of achieving a net gain in biodiversity, and has assessed the preliminary Scheme design using the Department for Environment, Food and Rural Affairs' v3.0 metric. Details of the assessment undertaken are reported in the Environmental Statement, with the results showing a net gain in biodiversity for each of the habitat types relevant to the Scheme area.	

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			<p>mitigation at certain places will help to achieve the BNG objective. The results of using the new BNG metric 3.0 will be an important part of the Environmental Statement as will a response to the calculation made. Areas calculated should, in our view, refer to real areas not just simplified ones from a 2D plan. The metric outcome, although not covering all matters (e.g. species' populations and potential implications for designated sites), should if appropriate influence the extent of habitat features created or retained or even the need to purchase some biodiversity credits if biodiversity enhancement is not possible on other land</p>			

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			away from the scheme area.			
165	Cheltenham Borough Council and Tewkesbury Borough Council	Traffic	Within the public consultation materials, there is no information relating to the transport assessment or traffic modelling. Thus, the recent consultation documents do not detail the traffic impacts to a level that are required for a full detailed response. However, in principle, the Joint Councils accept the significant traffic benefits of allowing traffic from the West Cheltenham development and Golden Valley Development to use Junction 10 and thereby reducing pressure on Junction 11 and local roads.	N/A	This comment is noted. Traffic modelling has been undertaken and included in the Transport Assessment. This forms part of the Development Consent Order Application.	
166	Gloucestershire County Council	Design	At this stage, the submitted scheme drawings do not provide any details of	N/A	Draft signage and lining have been included in the preliminary designs as part of the submission of the	Draft signage and lining are included on latest DF3.4 drawings.

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			the proposed signing or lining of the road scheme.		Development Consent Order application.	
167	Gloucestershire County Council	Environment	Tables on watercourse construction impact pathways and watercourse operational impact pathways are very useful and something like these should be included in the Environmental Statement. The new clear span bridge over the River Chelt and enhancement of existing culverts with mammal ledges is very important and relevant to the comments on otters below. Also, the section on mitigating and enhancing aquatic habitats is supported.	N/A	The tables referenced are within the Environmental Statement, with any necessary updates made.	
170	Gloucestershire County Council	Design	We are pleased to see there will be a dedicated cycle path created on the northern side of the A4019, which should aid in encouraging the	Yes	It is noted that the provision of a dedicated cycle path on the northern side of the A4019 is supported. At the eastbound Elms Park bus stop near Homecroft Drive the latest DF3.4 design includes a bus	At the eastbound Elms Park bus stop near Homecroft Drive the latest DF3.4 design includes a bus stop layby with a 3.5m wide island provided between the bus stop layby and the cycle track. A zebra crossing of the cycle

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			use of non-car modes. Again, further points of clarification will be required at the next iteration of the design. This includes the interaction of the proposed bus stop and cycle lane in the location of the junction of Homecroft Drive on the northern side of the A4019.		stop layby with a 3.5m wide island provided between the bus stop layby and the cycle track. A zebra crossing of the cycle track is included to allow pedestrians to cross the cycle path to the footway maintaining segregation between the cyclist and pedestrian facilities.	track is included to allow pedestrians to cross the cycle path to the footway maintaining segregation between the cyclist and pedestrian facilities.
171	Gloucestershire County Council	Design	There is a requirement that swept path analysis of all junctions and access roads is provided, which should include movements of waste refuse vehicles. This is a key consideration for the new short sections of access roads which will be created alongside the proposed widened A4019. There will be a need to understand how these proposed short access roads will interact with the proposed signalisation	Yes	Additional primary signal head has been provided. These signals have been positioned for visibility to main side road carriageway but should be visible to service road traffic without causing confusion as to where the right of way applies. 'Keep Clear' markings have also been added to prevent vehicles blocking the entry width into the access to the eastern service road. The available space between the stop line and the start of the 'Keep Clear' marking would be approximately 5m and sufficient for a standard car to enter. Swept path analysis has been undertaken to confirm that the turning movements are possible for various types of vehicles anticipated to use the	Additional primary signal head has been provided. These signals have been positioned for visibility to main side road carriageway but should be visible to service road traffic without causing confusion as to where the right of way applies. 'Keep Clear' markings have also been added to prevent vehicles blocking the entry width into the access to the eastern service road. The available space between the stop line and the start of the 'Keep Clear' marking would be approximately 5m and sufficient for a standard car to enter. Swept path analysis has been undertaken to confirm that the turning movements are

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			of the junctions. Of particular note is the new section of access road created at the junction of the A4019/The Green. At present it is difficult to understand how residents using these access roads will have visibility of the proposed signal heads at this junction.		service roads. Large vehicles including a 7.5t box van and refuge vehicle have been assessed and these can perform the likely turning movements with some limited over-run into opposing lanes in places. The design at this location comprises a non-typical layout based on the need to minimise impacts on existing properties on the north side of the A4019 and Manor Farm land and outbuildings to the south of the scheme. Further geometrical improvements are constrained without acquiring additional land.	possible for various types of vehicles anticipated to use the service roads. Large vehicles including a 7.5t box van and refuge vehicle have been assessed and these can perform the likely turning movements with some limited over-run into opposing lanes in places. The design at this location comprises a non-typical layout based on the need to minimise impacts on existing properties on the north side of the A4019 and Manor Farm land and outbuildings to the south of the scheme. Further geometrical improvements are constrained without acquiring additional land.
172	Gloucestershire County Council	Design	Further details of the proposed access to the existing Cheltenham West fire station should be provided and clarified, and it is recommended that the applicant consults with Gloucestershire Fire and Rescue Service to understand their requirements for access. With the	No	The Applicant has continued to liaise with Gloucestershire Fire and Rescue Service to ensure their requirements are met. The design currently proposes use of Wig Wags (as current situation) to allow emergency exit onto the A4019. The comment on the Traffic Regulation Order has been noted.	Design proposal remains the same as previously i.e. use of Wig Wags to allow emergency exit onto the A4019 as per the existing situation. No U-Turn has been proposed for the A4019 length from Kingsditch Roundabout to the west of the Link Road junction which encompasses the fire station.

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			<p>proposed arrangement, any fire tenders leaving the site will need to cross a dual carriageway to head towards Cheltenham. It is likely some form of part time control will be needed here to allow the safe and efficient exit of these vehicles. Furthermore, a Traffic Regulation Order will be required to restrict vehicles heading east on the A4019 using this section of highway to turn right or complete u-turn movements.</p>			
173	Gloucestershire County Council	Traffic	<p>The Transport Assessment will need to include a comprehensive Walking, Cycling and Horse-Riding Assessment which follows the guidance in GG142.</p>	N/A	<p>A Walking, Cycling and Horse Riding Assessment has been undertaken.</p>	
174	Gloucestershire County Council	Design	<p>Is it sufficient to have same colour lines as a</p>	n/a	<p>The Applicant is not clear on the comment.</p>	<p>We are not clear on the comment, however, if it refers to</p>

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			segregated barrier at the motorway junction?		However, if it refers to the method for segregating cyclists and pedestrians through the junction then this will be some form of kerb or separation strip and not just coloured lines.	the method for segregating cyclists and pedestrians through the junction then this will be some form of kerb or separation strip and not just coloured lines.
175	Gloucestershire County Council	Traffic	It is crucial that a full Transport Assessment is provided as part of the Environmental Statement (ES). This should include individual junction assessment of the proposed signalised junctions on the A4019 so we can fully understand the operation and capacity of these junctions. It is suggested that in a future year six after the opening of the Scheme, there is a substantial change to the turning movements proposed at the Gallagher Retail Park junction, with the banning of right turns. Several modelling scenarios should be included with the	N/A	This comment is noted, and a full Transport Assessment has been prepared and submitted as part of the Development Consent Order application. A microsimulation model using Paramics software has been developed and used to assess the key junctions along A4019 between Coombe Hill and Kingsditch Roundabout. The Scheme results in five new signalised junctions between M5 Junction 10 and Gallagher Retail Park Junction. Given the total number of signalised junctions that would be in operation over relatively short length of the A4019 corridor (about 3.25km) between M5 Junction 10 and Kingsditch, the junctions need to work in a co-ordinated manner. The collective performance of these junctions is reported in the Transport Assessment in terms of journey time and queues under various scenarios.	

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			Transport Assessment which picks up on these points.			
176	Gloucestershire County Council	Design	Will there be sufficient linkages from segregated routes to local networks?	Yes	The Scheme includes a segregated route along the north side of the A4019 from its western scheme extent to the A4019 / B4634 junction. This route connects into the Public Rights of Way network and the local highway network with controlled crossings provided at key locations (Withybridge Lane, the West Cheltenham Link Road and at Uckington where there is a signal-controlled junction with The Green and Moat Lane). The segregated route ties-in at the Development Consent Order Limits, ready for future connections by developers and Gloucestershire County Council.	Segregated facilities remain as the previous design iteration and the route connects into the Public Rights of Way network and the local highway network. Controlled crossings are still provided at key locations namely the signal-controlled junctions at the WCLR, Uckington, Safeguarded Site access, North West Cheltenham (Elms Park) Allocated Site access and Gallagher Retail Park. In addition to this a shared underpass has been included on the A4019 to the east of M5 Junction 10 which will provide a new Public Rights of Way linking Withybridge Lane to the northern side of the proposed A4019 dual-carriageway including a connection to the existing bridleway located to the north of the A4019. Thus an equestrian route from the existing bridleway to Withybridge Lane will be provided.
177	Gloucestershire County Council	Design	How will segregated route outlined for the	No	This falls outside the scope of the Scheme.	This falls outside the scope of the Scheme.

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			West Cheltenham Link Road be connected into Tewkesbury Road and Kings ditch, Hester's Way and Springbank?		The expectation is that the West Cheltenham Development will be taking this forward.	The expectation is that the West Cheltenham Development will be taking this forward.
178	Gloucestershire County Council	Design	From a Public Rights of Way point of view we welcome the effort to provide new walking and cycling links within the scheme. However, it doesn't appear that the opportunity to link walkers, cyclists, and horse riders with an improved Bridleway AEH1 which runs north east from the A4019, has been taken, which may be seen as a lost opportunity. It's the blue line on the plan below.	Yes	An underpass has been included on the A4019 to the east of M5 Junction 10 to provide a Public Rights of Way route from the bridleway AUC1 to Withybridge Lane. The underpass is shared use and has been designed to accommodate equestrians. The underpass will provide a more desirable route for equestrians away from the A4019. Equestrian users will be accommodated at the east of the Scheme by the inclusion of an equestrian phase and a push button at the Uckington Junction linking the bridleway (AUC14) to The Green in the north.	An underpass has been included on the A4019 to the east of M5 Junction 10 to provide a Public Rights of Way route from the bridleway AUC1 to Withybridge Lane. The underpass is shared use and has been designed to accommodate equestrians. The underpass will provide a more desirable route for equestrians away from the A4019. Equestrian users will be accommodated at the east of the Scheme by the inclusion of an equestrian phase and a push button at the Uckington Junction linking the bridleway (AUC14) to The Green in the north.
179	Gloucestershire County Council	Environment	Consideration of the likely collisions between traffic and some wildlife species at night appears to be missing or not very explicit, specifically barn owls and larger	N/A	Species such as deer and wild boar would not usually be considered within the Environmental Statement as they are not protected or priority species. However, following this comment, consideration has been given to the most appropriate place to discuss this matter within the	

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			<p>mammals such as deer. The general abundance of such species in the surrounding countryside after scheme completion will be a factor and some reference to this topic for biodiversity and road safety reasons in the Environmental Statement would be wise. It is noted this matter is addressed in the Preliminary Environmental Information Report with respect to badgers, otters, and amphibians/reptiles. Landscaping including embankment height and tree planting can mitigate some such risk upon barn owls but possibly not larger mammals such as deer (or even wild boar in the future) but other measures could help with this.</p>		<p>Environmental Statement. Barn owl surveys have been undertaken this year, so further information with regard to this species is included in the Environmental Statement.</p>	

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180	Gloucestershire County Council	Environment	<p>Otters are present in the area and so there needs to be some anticipation of likely change in otter movements because of implementing the scheme. This is as opposed to just purely considering existing movement patterns and mitigating for any impact on the current situation. New wetland features/habitats may attract otters on a regular or occasional basis, e.g., to balancing ponds or washlands. So, just an assessment in the Environmental Statement of the use of existing watercourses and associated habitat is unlikely to be sufficient. Mitigation may require further tweaks such as designs of structures (bridges/culverts) or landscaping (corridors</p>	Yes	<p>These matters have been addressed in the Environmental Statement. As an update, badger and otter fencing has now been included in the design along the West Cheltenham Link Road, but further consideration will be given to these comments.</p>	<p>An otter ledge is included within the River Chelt culvert (underneath the M5). Tunnels for wildlife (including otters) are included in the design underneath the West Cheltenham Link Road.</p>

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			that would be preferentially used by otters) or special fencing so that otters (and badgers) are less likely to cross a carriageway. If all risks cannot be reasonably reduced, then there may be a need for some strategically placed 'otter' eye level reflectors to bounce back car headlights to deter otters from the roadside at night (and similarly deer perhaps?).			
181	Gloucestershire County Council	Environment	Great Crested Newt District Level Licensing should be employed if the cost is similar or less than traditional licencing. This is because Gloucestershire County Council promotes the use of this scheme to others, and it helps to provide new habitats for Great Crested Newt in a strategic way across	N/A	It is noted that the Applicant is in support of the District Level Licensing scheme for Great Crested Newts.	

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			the county. The most important part of District Level Licensing is that it results in fewer delays to works especially if designs or proposed operations or timetables change. We are aware that Gloucestershire County Council/Atkins are in contact with Naturespace who can advise further. They will also be able to confirm how District Level Licensing may be employed, i.e. because there is a link with consenting of some aspect of the highways scheme such as from a Local Planning Authority or other decision maker.			
182	Gloucestershire County Council	Environment	We note a Habitats Regulations Assessment screening report is being prepared with input from Natural England and the main concern is impact on migratory	N/A	The Habitats Regulations Assessment has been submitted within the Environmental Statement (Appendices 7.13 and 7.14).	

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			fish population connected with Severn Estuary. It would be good to see early sight of a confirmed or near final version of a Habitats Regulations Assessment document for the scheme.			
183	Gloucestershire County Council	Environment	Landscaping with an emphasis on native woodland strips, hedgerows, wetland features and wildflowers (grass verges/reservations) is appropriate and could have benefits in certain locations for improving visual appearance, water capture, attenuation of air, noise, and light pollution. This could be emphasised and considered more in the forthcoming Environmental Statement. Enriched topsoil should not be imported but on-site supplies moved to areas that will mainly	N/A	Further detail has been included in the Environmental Statement.	

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			become woodland, tree lined or hedgerow. Areas to become open grassland should have minimal substrate so that an enriched grassland does not develop which would be poor for biodiversity value and a higher cost to maintain (i.e. require more regular cutting).			
184	Gloucestershire County Council	Environment	In the Cumulative Effects chapter of the forthcoming Environmental Statement, intra-scheme topics that ought to be covered include Safe Lighting/Biodiversity/Landscape, Highway Drainage/Biodiversity and Visual Impact & Landscape Character/Biodiversity.	N/A	The methodology for the Cumulative Effects Assessment sets out the process that has been followed for the identification of intra-Scheme cross-topic cumulative effects. The starting point for this is the findings of the topic based assessments, thus the topics that are considered are derived from the scope of assessment work that is required for each of these environmental topics (typically as prescribed in Design Manual for Roads and Bridges). This aspect of the Cumulative Effects Assessment is then explored on a receptor-centric basis, with cross-tabulations of receptors that appear in two or more topic assessments then	

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					supported by a fuller narrative of what the impacts are and how they combine to give rise to cumulative effects (or not). Certain receptors have been noted as experiencing combinations of impacts as noted in the original comment. In other instances, the approach to multi-disciplinary inputs to the environmental design has ensured that certain combinations of impacts identified in the comment have been avoided/designed out (e.g. conflicts between lighting, biodiversity, and landscape).	
193	Gloucestershire County Council	Environment	Reference to a Construction Environmental Management Plan and what ecological topics it should include is welcomed. An outline CEMP would be useful to have at the Development Consent Order stage even if this just contains what will be included (again), i.e. referring to key ecological mitigation for the construction phase. This should include the	N/A	An outline Construction Environmental Management Plan (referred to as the Environmental Management Plan 1st iteration) has been included as part of the Development Consent Order submission. Annex B and Annex C of the Environmental Management Plan 1st iteration outlines the environmental method statements which will be completed as part of further iterations.	

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			topic of having measures that mean there would not be undue spread of Himalayan Balsam or Common Ragwort or Rhododendron or Cotoneaster or species listed under the Weeds Act. Control of polluting substances and soil/dust/silt to watercourses will also be important.			
194	Gloucestershire County Council	Environment	The Road Drainage and the Water Environment chapter of the Preliminary Environmental Information Report shows that the primary source of flood risk to the area is fluvial flooding from the River Chelt, its associated tributaries, and the Leigh Brook. These not only pose a risk to the Scheme itself, but the Scheme could have an adverse impact on flooding	N/A	Flood risk both to and from the Scheme is described in the Flood Risk Assessment report, along with the embedded mitigation that controls that impact.	

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			elsewhere if appropriate mitigating steps are not taken.			
195	Gloucestershire County Council	Design	<p>Some thought on how future maintenance of verges could be facilitated to allow for removal of arisings and for them to perhaps be deposited somewhere on site as a sacrificial area maybe along with shrub/tree prunings. The sacrificial areas (if appropriate) would provide a different kind of habitat for a range of different animal species, e.g., invertebrates, fungi and reptiles/amphibians. This approach is being sought at various locations by Gloucestershire County Council and Ringway over the coming years so it would be useful if some investigation into what might be possible</p>	N/A	<p>This comment is noted and options for inclusion in the design are being investigated with Gloucestershire County Council and will be finalised at the detailed design stage.</p>	

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			within the scope of these highway improvements is carried out.			
196	Gloucestershire County Council	Design	Lighting impact on potential bat and other nocturnal wildlife needs to be considered sufficiently. We need to be sure that indicative lighting schemes can be acceptable because they can demonstrate no significant impact on valued species. Some mitigation will take the form of enhancing existing or creating new dark corridors/areas. It would be extremely helpful if indicative schemes could be presented in the Environmental Statement showing predicted lux levels as contours on a drawing and/or 3D indicative visualisation diagrams. Generally, we should be aiming at not much	N/A	Design of lighting has considered the environmental and ecological impacts and has been updated where possible to mitigate impacts, e.g. creation of dark corridors for bats on A4019. Residual impacts have been reported in the Environmental Statement.	

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			<p>more than 1.0 lux upon important hedgerows, woodlands, and wetland features. Crossing points beneath the road (and potentially above it by bats) should be dark at their entry/exit points (over/under the carriageway/cycleway/footway). This could potentially be challenging, but is an important aspect that may receive scrutiny at the Development Consent Order stage as the topic also has crossovers with visual and landscape character impact. There are lots of luminaire designs that can help to reduce impact but where lighting is not strictly needed, and could have an unacceptable impact on biodiversity, it should not be installed. LEDs used should not exceed 3,000K in colour</p>			

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			temperature and at crucial locations where bats are present colour temperature should be reduced further. We are therefore pleased to see LEDs of a colour temperature of 2,700 are quoted for at least some locations. Over time, landscaping vegetation may improve the lighting scenario but the impact of the newly constructed road with respect to lighting must be considered first to see if it is acceptable.			
197	Gloucestershire County Council	Environment	The proposed review of the 'South West Aggregates Working Party Annual Report: 2018' needs updating to: 'South West Aggregates Working Party - Annual Report 2020';	N/A	The most up to date version of documents has been reviewed for the Environmental Statement.	
198	Gloucestershire County Council	Environment	The proposed review of the 'Environment Agency, Waste Data	N/A	The most up to date version of documents has been reviewed for the Environmental Statement.	

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			Interrogator, 2019' needs updating to: '2020 Waste Data Interrogator';			
199	Gloucestershire County Council	Environment	The proposed review of the 'Environment Agency, Remaining Landfill Capacity, 2020' needs updating to: 'Remaining Landfill Capacity 2021'	N/A	The most up to date version of documents has been reviewed for the Environmental Statement.	
200	Gloucestershire County Council	Environment	A review of the recommended updated data sources highlighted above may also have an impact on the future presentation of the 'Baseline conditions' .	N/A	Baseline sections have incorporated most recent data from updated documents on landfill capacity and waste infrastructure.	
202	Gloucestershire County Council	Environment	In addition, within 'Potential mitigation measures', consideration could be given to the future use of underlying mineral resources (those subject to local mineral safeguarding provisions). The resources could make a positive contribution to the proposed	N/A	Where the option to utilise the underlying mineral resources is proposed by the Principal Contractor, this has been recorded in the mitigations section of the Environmental Statement.	

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			<p>material assets of the development. On-site sourced aggregate minerals could potentially reduce the amount of imported raw materials needed and the carbon footprint of the overall project. The concept of 'prior extraction', which would transpire if this suggested opportunity was pursued, is identified in the adopted Minerals Local Plan for Gloucestershire (2018 – 2032). It is a potentially acceptable solution for resolving the risk of needless mineral sterilisation. See adopted Minerals Local Plan section 7 (Mineral safeguarding), pages 37 to 40 for further local policy information.</p>			
203	Gloucestershire County Council	Environment	Given the deprivation and health profile of these communities,	N/A	Noted. The Human Health element of the Environmental Statement has been developed further, in	

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			<p>there is the potential for this scheme to contribute towards a reduction in health inequalities. Less traffic also has the potential to encourage and enable residents to access local green and recreational space e.g. Hester's Way and Springfields Park, with the attendant benefits to physical and mental health and wellbeing and opportunities for social interaction. Traffic calming measures, if not already in place, would enhance the potential benefits when congestion levels fall.</p>		<p>accordance with LA 112. Design Manual for Roads and Bridges LA112 does not require significance to be assigned to human health outcomes -no methodology is provided for this aspect of the chapter. Detail has been added to explain health outcomes and consideration has been given to potential measures that could address identified negative health outcomes. Separately, a Health Impact Assessment has been undertaken and findings of that process have been used as a reference point for the Environment Statement.</p>	
204	Gloucestershire County Council	Environment	<p>Noise, vibration and air quality impacts during construction and operation of the new or altered routes have the potential to impact negatively on physical and mental health and wellbeing. We strongly support the intention to</p>	N/A	<p>Noted. The Human Health element of the Environmental Statement (ES) has been developed further, in accordance with LA 112. Design Manual for Roads and Bridges LA112 does not require significance to be assigned to human health outcomes -no methodology is provided for this aspect of the chapter. Detail has</p>	

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			study these potential effects during the next stage of the Environment Impact Assessment and to undertake mitigations along sensitive areas.		been added to explain health outcomes and consideration has been given to potential measures that could address identified negative health outcomes	
205	Gloucestershire County Council	Environment	The temporary and permanent loss of land and/or demolition of some properties has the potential to have a significant detrimental impact on the mental health and wellbeing of landowners and occupiers. The intention to undertake further consultation and compensate landowners and occupiers is strongly supported alongside any other mitigation identified via these conversations alongside the provision of mental health awareness training for community engagement workers, signposting to sources of support and any	N/A	The Human Health element of the Environmental Statement has been developed further, in accordance with Design Manual for Roads and Bridges LA112. Subsequent to this and following engagement with UK Health Security Agency representatives in October 2022, the Environmental Statement will be further developed to move from health outcomes (as per Design Manual for Roads and Bridges LA112) to health effects and assignment of a level of significance to these effects, reflecting the latest PINS precedent within the Scoping Opinion for the proposed M60 scheme and the requirements of the Environmental Impact Assessment Directive. Consultation is underway and ongoing with affected landowners and occupiers in respect of loss of land and demolition of properties, with the Applicant seeking to respond to comments received.	

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			other mitigations identified via these conversations.		The health outcomes of these impacts are noted and will be converted to effects assessment in due course. In addition, the Gloucestershire County Council Prevention, Wellbeing and Communities team has been consulted to discuss health and wellbeing issues and concerns in the study area, as well as explore means of mitigating potential effects that could arise. The consultee suggestions regarding mitigation are being considered and may feature within proposals, noting that the Applicant has identified a number of opportunities to support better mental health through the way in which the contractor engages with and informs the affected communities about the Scheme.	
206	Gloucestershire County Council	Environment	The potential benefits to communities living close to existing 'rat runs' through Hester's Way could be offset by the development of new rat runs during the construction period and beyond. An assessment of when and where these could	N/A	The Population and Human Health assessment draws on the findings of the noise and air quality assessments (amongst others). Both of these develop modelling that is rooted in traffic modelling for the Scheme. This traffic modelling will explore the likely dispersion of traffic across the Affected Road Network under different scenarios and should allow for the resultant	

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			<p>occur and their potential impact on noise, air quality, safety, and opportunities to enjoy local facilities, alongside the necessary undertake mitigations, would be strongly supported.</p>		<p>impacts on traffic flows, air quality and noise climate to be quantified in accordance with the recognised Design Manual for Roads and Bridges methodologies.</p> <p>The Population and Human Health assessment follows the LA112 methodology to take account of these technical assessments and highlights them as appropriate within the Environmental Statement.</p> <p>The potential impacts of traffic reassignment has been given due consideration in relation to the effects that may be identified. This will be subject to further review to confirm whether there are any locations where the projected change in traffic flow may be below threshold for inclusion in the Affected Road Network of topic chapters, but could still perceptibly alter characteristics of streets and therefore safety risks (e.g. conflict/collision risk). Such instances would be reported within the health assessment, as/if appropriate.</p> <p>The Scheme design has been subject to a Stage 1 Road Safety Audit (. A Stage 2 Road Safety Audit will be undertaken at Detailed Design and a Stage 3 following scheme construction. These Road</p>	

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					Safety Audits will identify any road safety issues with the design.	
216	Gloucestershire County Council	Environment	The climate change impacts as outlined do seem to be based on very general assumptions with no specific modelling and also no consideration of changing vehicle usage.	N/A	The traffic modelling assessment includes changes to vehicles as the UK moves towards Net Zero and the increase in Electric vehicles grows. However, it is anticipated that the drop in emissions will be greater than modelled due to government policy to phase out petrol/diesel vehicles in the 2030s and will reach close to Net Zero emissions by 2050. This is noted within in the Environmental Statement when operating emissions are discussed.	
223	Gloucestershire County Council	Environment	From the information provided, it is not clear whether the proposed flood measures have been scaled to account for the increasing frequency and impact of extreme weather events arising from the warming climate. This needs to be clarified.	N/A	This point has been clarified in the Environmental Statement (ES). Drainage infrastructure is designed with consideration of projected future changes in precipitation, both gradual changes to average amounts and changes to maximum amounts from extreme events.	
224	Gloucestershire County Council	Active Travel	Will there be advanced lines provided at traffic lights for cyclists to ensure priority at	No	The Scheme is providing separate segregated facilities and will not provide advanced stop lines. Local Transport Note 1/20 recommends	The Scheme is providing separate segregated facilities and will not provide advanced stop lines.

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			junctions otherwise the incentive to use the route is diminished?		against advanced stop lines when the traffic flows, number of lanes and proportion of green time expected are similar to those that will be found on most parts of this Scheme.	Local Transport Note 1/20 recommends against advanced stop lines when the traffic flows, number of lanes and proportion of green time expected are similar to those that will be found on most parts of this Scheme.
225	Gloucestershire County Council	Environment	Clarification is also required in relation to the frequency of air quality monitoring. Will this be undertaken before construction commences, during construction and after scheme completion?	N/A	<p>Routine monitoring of dust generated at the construction stage has not been recommended. Given the largely rural surroundings for the M5 Junction 10 construction site it would not be anticipated that construction dust monitoring would be necessary as standard high risk site mitigation measures are likely to be sufficient to control construction dust emissions.</p> <p>This has been assessed in the environmental assessment and proposed mitigation measures are included in the Environmental Management Plan which has been prepared alongside the Environmental Statement. Annex B of the Environmental Management Plan outlines that an Air Quality Management Plan will be produced as part of the 2nd iteration.</p> <p>Should particularly sensitive receptors such as food production</p>	

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					plants or electronics factories or activities with a much higher than normal dust risk potential be identified, quantitative monitoring surveys will be recommended to ensure that the appropriate mitigation measures are effective. Where the local authority requires a monitoring survey, a suitable approach would be recommended.	
227	Gloucestershire County Council	Environment	The first stage is to draw a long list of these, and it is understood that this will be provided in the next stage of the Environmental Impact Assessment. Further consultation will take place at that stage to provide a shortlisting process. We would welcome further opportunity to comment on this as the Environmental Impact Assessment is developed. A key consideration of this will be to consider how the traffic flows from these proposals have been considered in the	N/A	This forms part of the Cumulative Effects Assessment which is reported in the Environmental Statement. The Reasonably Foreseeable Future Projects long-list has been produced and a short-listing process is underway. In addition to this, the Cumulative Effects Assessment team has liaised with the traffic modelling team to confirm the way in which the detail of Reasonably Foreseeable Future Projects is expressed within the model, alongside any modelling assumptions made regarding the phasing of site allocations within the local development plan. The aim of this process is to ensure that there is no double counting; and that any local spatial bias is appropriately reflected within the traffic model (and in turn through	

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			transport modelling supporting the Scheme. This will need to ensure that there is no double counting of trips should a TEMPRO growth factor be used alongside individual flows for allocated sites. Again, it is recommended that the scope of any modelling work is agreed with National Highways at the earliest possible stage.		the noise and air quality modelling and assessment work). Relevant technical stakeholders have been engaged in a process of validating the Reasonably Foreseeable Future Projects shortlist, the scope of which includes the traffic modelling.	
323	Gloucestershire County Council	Design	Cheltenham West Fire Station: We would strongly recommend an assessment of the potential impacts on access to and from the fire station during construction and operation and robust mitigation against any risks to access.	N/A	This will be discussed with the successful contractor and incorporated within the Early Contractor Involvement Construction Contract at the next stage.	This will be discussed with the successful contractor and incorporated within the Early Contractor Involvement Construction Contract at the next stage, and parallel to Development Consent Order examination.
513	South Gloucestershire Council	Traffic	The previous scheme proposals (also referenced within the Preliminary	N/A	The impacts of the necessary closures as part of new Junction 10 have been considered and mitigated as best as possible. The	

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			Environmental Impact Report) showed different options to enable an all-movement junction at Junction 10, some of which were slightly distanced from the current junction which would help with construction and traffic management. The preferred option taken forward is to improve at the existing junction location, resulting in greater potential for traffic disruption during construction as the traffic management will be more complex and may require longer periods of local traffic management diversions than if construction were off-line.		Applicant continues to work with National Highways and Gloucestershire County Council as the Highways Authority to ensure minimal impact of construction on the wider network, whilst recognising that closures and diversions will be necessary over the course of the works. Further work on constructability, phasing and traffic management is produced as part of our Development Consent Order application.	
514	South Gloucestershire Council	Traffic	We are unable to find information within the consultation documentation on traffic management, potential	N/A	A Traffic Management Plan for the construction phase, will be developed once a contractor is appointed. This will include the necessary details on potential diversions.	

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			diversion/displacement routes relating to the construction phase, that would enable us to establish whether or not there could be effects on the wider area including on the network in South Gloucestershire. We suggest that this information should be provided.			
552	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils would expect the Environmental Statement to assess and determine the benefit and/or efficiency of mitigation options. The Joint Councils would also expect the Environmental Statement to include non-acoustic environmental factors (such as material selection, visual impacts, spatial constraints) that have been considered for the design of noise	N/A	The mitigation section of the Noise and Vibration chapter of the Environmental Statement includes further detail.	

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			barriers and/or noise bunds.			
555	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	It is noted in the Landscape and visual chapter of the Preliminary Environmental Information Report that arboricultural surveys are proposed. These surveys must be to the BS 5837 (2012) standard and must include surveys for any ancient and veteran trees which may be impacted by the Scheme. Impacts on existing trees should be detailed and made clear as well as proposed tree planting details in the Environmental Statement. The Biodiversity chapter should also refer to the results of this survey to confirm whether any additional ancient or veteran trees are recorded within the study area.	N/A	We can confirm that the M5 Junction 10 arboricultural survey is to BS 5837 (2012) standard and includes a survey for any ancient and veteran trees which may be impacted by the Scheme. The Biodiversity Environmental Statement chapter refers to the results of the arboricultural survey to confirm whether any additional ancient or veteran trees are recorded within the study area.	

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
557	Cheltenham Borough Council and Tewkesbury Borough Council	Environment	The Joint Councils would expect to see more details regarding the reasons for screening out water bodies in the update to the Water Framework Directive. assessment.	N/A	The text has been updated and included in the Water Framework Directive. This text is: These water bodies fall within the area of the red line boundary where works will only be carried out on signage. As this is expected to have no impact on the water environment, the water bodies have been screened out.	
558	Gloucestershire County Council	Environment	Whilst the current proposals for active travel measures are welcome, officers do feel that there is further potential for the proposed scheme to help support Gloucestershire's commitment for an 80% reduction in transport carbon emissions by 2030 and achieve Net Zero by 2045. This could include measures to encourage car sharing and public transport use, such as the provision of bus priority measures supporting enhanced travel times to Arle Court Transport Hub	N/A	Every effort to integrate proposals to support use of sustainable transport measures where possible within the scope of the Scheme, which is designed to enable planned development in the area. Several of these suggestions are beyond the scope of scheme, however we recognise the importance of this context.	

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			and Cheltenham Town Centre.			
559	Gloucestershire County Council	Environment	Biodiversity monitoring arrangements is welcomed – but more information is required on proposals to overcome the barriers to wildlife movement caused by the proposed scheme. Will there be biodiversity monitoring post-scheme development?	N/A	Information on proposals to avoid fragmentation of habitats and therefore overcome barriers to wildlife movement are presented in the Biodiversity chapter of the Environmental Statement.	

M.3. Non Statutory Stakeholders

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
521	Gloucestershire Wildlife Trust	Environment	Impacts on the Site of Special Scientific Interest and land functionally linked to the Special Protection Areas are not adequately covered by the Preliminary Environmental Information Report, which does not assess impact on recreational pressure.	N/A	It is acknowledged that the Scheme will 'unlock' a number of housing developments that will result in an increase in residents in the area, which could potentially result in an increase in visitor pressure to the sites mentioned. As discussed in the Preliminary Environmental Information Report, the cumulative effects of the Scheme and these other developments have been addressed as part of the Environmental Statement process within the Cumulative Effects Assessment. This includes an assessment of recreational pressure.	
523	Gloucestershire Wildlife Trust	Environment	To be compliant with The Conservation of Habitats and Species Regulations 2017 (as amended) the Preliminary Environmental Information Report should undertake a Habitats Regulations Assessment. This should include an assessment of cumulative impacts on the Site of Special Scientific Interest and Special Protection Areas linked land that will result from providing	N/A	A Habitats Regulation Assessment has been produced for the Scheme, and is included as part of the Environmental Statement. The assessment provided is an update to the version included as part of the Preliminary Environmental Information Report.	

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			enhanced access for the growing population, which is due to several strategic housing allocations being near to the Scheme.			
524	Gloucestershire Wildlife Trust	Environment	Gloucestershire Wildlife Trust considers that any residual significant adverse impact on the Site of Special Scientific Interest or Special Protection Areas functionally linked land would also not be compliant with the National Policy Statement for National Networks to “avoid significant harm to biodiversity interests”. Would this be compliant with the enhanced Natural Environment and Rural Communities Act duties for Public Bodies, introduced by the Environment Act 2021.	N/A	The Applicant has have resolved any significant adverse effects prior to submission of the Development Consent Order Application to avoid any consenting risks.	
526	Gloucestershire Wildlife Trust	Environment	The assessment of impacts on the Site of Special Scientific Interest and land functionally linked to the Special Protection Areas should include information from a new visitor survey being led by Stroud District Council on behalf of the Local Authorities involved in the Special Protection Areas.	N/A	The information was requested, received, and subsequently reviewed, and incorporated into the updated Habitats Regulations Assessment, which has been included as part of the Environmental Statement.	
527	Gloucestershire Wildlife Trust	Environment	Natural England’s established guidance requires a minimum of 8	No	The Development Consent Order Application does not	The Development Consent Order Application does not apply for

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			<p>ha of Suitable Accessible Natural Green Spaces per 1000 people in new development that impacts internationally designated sites. The scheme presents an opportunity to create Suitable Accessible Natural Green Space that can support future housing growth, as well as multiple environmental benefits such as carbon sequestration and water management. The potential for this has been discussed but is disappointed that this is not currently reflected in the Preliminary Environmental Information Report or scheme design.</p>		<p>apply for public access for the flood storage area, due to the uncertainty around the position on land acquisition, with the landowner previously indicating a desire for the land to be returned post construction and would not want land returned with public access rights. Public access is not considered a justifiable reason for a Compulsory Purchase Order of the land.</p>	<p>public access for the flood storage area, due to the uncertainty around the position on land acquisition, with the landowner previously indicating a desire for the land to be returned post construction and would not want land returned with public access rights. Public access is not considered a justifiable reason for a Compulsory Purchase Order of the land.</p>
528	Gloucestershire Wildlife Trust	Environment	<p>The National Policy Statement for National Networks requires decisions to “consider Government aims to halt biodiversity loss’ and ‘establish coherent ecological networks”. However, the Preliminary Environmental Information Report does not currently highlight the Nature Recovery Network as a receptor against which impacts should be assessed.</p>	N/A	<p>The Nature Recovery Network has used as a tool to guide the assessment. In particular the Nature Recovery Network has been drawn on when valuing receptors (habitats) and in the design of the mitigation and compensation proposals. The Nature Recovery Network has also been used when establishing the value of existing and proposed habitats as part of the Biodiversity Net Gain assessment. As the Nature</p>	

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					Recovery Network encompasses a number of habitat types, which are considered separately as part of the assessment, it is not considered appropriate for the Nature Recovery Network to be a receptor in its own right, but instead used as an important guiding tool, as has been done.	
529	Gloucestershire Wildlife Trust	Environment	The Environment Act 2021 introduced mandatory Biodiversity Net Gain for all new developments, including National Significant Infrastructure Projects. Government has indicated that there will be phased introduction of this, with National Significant Infrastructure Projects being required to comply by 2025. The Scheme should be required to deliver mandatory Biodiversity Net Gain because the Development Consent Order will be submitted after the Environment Act received royal ascent.	N/A	An assessment of the Biodiversity Net Gain for the preliminary design of the Scheme has been undertaken using the Department for Environment, Food and Rural Affairs Metric 3.0. The methodology applied and the results are reported as part of the Environmental Statement. Based on the design, the Scheme will achieve a positive net gain in biodiversity within the current Development Consent Order limits.	
530	Gloucestershire Wildlife Trust	Environment	Gloucestershire Wildlife Trust welcomes the Scheme's current commitment to delivering Biodiversity Net Gain guided by the local environment and	N/A	An initial Biodiversity Net Gain assessment has been undertaken using the Department for Environment, Food and Rural Affairs Metric	

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			suggests that this should refer to being guided by the Nature Recovery Network.		3.0. Based on the design, a positive net gain is considered to be achievable within the current Development Consent Order Limits. The Nature Recovery Network was a key tool in this assessment.	
531	Gloucestershire Wildlife Trust	Environment	Is there sufficient land available within the red line boundary to deliver Biodiversity Net Gain and the likelihood of this land being secured by Development Consent Order. This has been a major issue with A417 Missing Link scheme where there is insufficient land within the red line boundary, much of which has not yet been secured. This means that the scheme is currently predicted to result in a minimum 29% net loss.	N/A	An assessment of the Biodiversity Net Gain for the preliminary design of the Scheme has been undertaken using the Department for Environment, Food and Rural Affairs Metric 3.0. The methodology applied and the results are reported as part of the Environmental Statement. Based on the design, the Scheme will achieve a positive net gain in biodiversity within the current Development Consent Order limits.	
532	Gloucestershire Wildlife Trust	Environment	It is strongly advised that the Department for Environment, Food and Rural Affairs biodiversity metric 3.0 is completed before the red-line boundary is set. This will reveal whether the boundary needs to be expanded or if additional land for offsetting is needed. If offsetting is required then a detailed plan for	N/A	An assessment of the Biodiversity Net Gain for the preliminary design of the Scheme has been undertaken using the Department for Environment, Food and Rural Affairs Metric 3.0. The methodology applied and the results are reported as part of the Environmental Statement.	

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			how this will be achieved, along with evidence of landowner support should be submitted as part of the Development Consent Order application.		Based on the design, the Scheme will achieve a positive net gain in biodiversity within the current Order limits.	
535	Gloucestershire Wildlife Trust	Environment	It is not clear how achievable compensatory habitat commitments will be given the Nitrogen Oxides levels around the junction. Gloucestershire Wildlife Trust recommends that this should be a detailed assessment in the Environmental Statement, depicting how much compensatory habitat will be in locations that exceed critical thresholds for Nitrogen Oxides.	N/A	Existing habitat immediately surrounding the M5 Junction 10 is dominated by plantation woodland, which is present on the motorway verges and along the existing slip roads. This habitat is likely to already be experiencing nitrogen deposition greater than its critical load range (according to the Air Pollution Information System website the nitrogen deposition is 49 Kg N/ha/year at Junction 10 and broadleaved deciduous woodland has a critical load range of 10 -20 Kg N/ha/year). However, it is anticipated that air quality will improve over time as vehicles are becoming cleaner and more efficient and the number of no and low emission vehicles increase across the fleet. Compensatory planting (including woodland, hedgerows, species rich grassland and scrub) will be	

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					<p>located along the new motorway embankments and adjacent to the new slip roads, but there will also be an area of new planting within the flood compensation area which is located further from the motorway. The compensatory habitats aim to replace lost habitat but will also enhance and improve the habitats through increasing the area and quality of more valuable habitats. These habitat creation areas will contribute towards meeting biodiversity net gain targets and will contribute to the Strategic Nature Areas. A management plan will be in place to ensure that habitats flourish and achieve their biodiversity function. The compensatory habitat does not meet the criteria for 'designated habitat' under LA105 and a detailed air quality assessment would not be appropriate. However, taking into account the existing habitats which are present adjacent to the motorway which are likely experiencing high nitrogen</p>	

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					deposition, and considering the trends in air quality, and given that there will also be habitat creation in an area located away from the motorway embankments and slip roads, as well as habitat management, the compensatory habitat commitments are considered to be achievable.	
547a	Save the Countryside	Environment	The local area around the existing junction is already prone to normal and abnormal pluvial and fluvial flooding.	N/A	The potential impacts of pluvial and fluvial flooding are being assessed as part of the development of the scheme design, and mitigation measures are included in the design to minimise the impacts of flooding.	
547b	Save the Countryside	Environment	The proposed Western Relief Road, and alterations to the A4019 across the flood plain will add to this potential flooding additional measures should be taken to counter this. The area along the A4019 from Cheltenham, has been identified as area of noise, and air pollution. Junction 10/Withybridge Gardens has been monitored for air quality by Tewkesbury Borough Council Environment Department for	N/A	The air quality assessment that has been undertaken (and reported in the Environmental Statement) considers Baseline conditions based upon local monitoring including monitoring tube 16N located at Withybridge Gardens. The potential impacts of the scheme to people and properties are being assessed and will be reported on in the	

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			many years, and their records are readily available. Mitigation measures: We wish to comment that the widening of Tewkesbury Road, will have a detrimental effect on residents of properties and homes, adjacent, with particular importance to several listed buildings at the proposed new junction at the Moat Lane, and New Road, and especially the Scheduled Monuments at the Moat House and the Moat. Mitigation barriers are not adequate to prevent pollution, they should be accompanied with landscape screening.		Environmental Statement. The Scheduled Monument of Moat House is considered as a sensitive receptor within the air quality assessment.	
548	Save the Countryside	Environment	We are also very aware of the increase of flooding along the proposed alterations to the A4019. The documents have acknowledged that flooding of the River Chelt flood plain will be altered by the construction of the proposed raised Western Link Road. We note that several holding ponds have been included in the designs, all on the south side of the A4019. However, the hamlet around Uckington, with listed buildings, is very susceptible to flooding and drainage issues, from the Leigh	N/A	The Scheme includes the following features: drainage ponds to attenuate runoff from the new highway and ensure discharges are kept at the existing greenfield rates, compensatory floodplain to provide replacement land for flooding where the scheme displaces water and flood storage to accept and accommodate floodwater that is prevented from moving to where it would without the scheme. Hydraulic modelling has been provided to the	

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			Brook. We suggest that additional holding ponds should be constructed in Gloucestershire County Council's field adjacent to the houses.		Environment Agency and is further documented in separate Baseline Modelling and Scheme Modelling reports. At this time the Environment Agency has reviewed the baseline model. Discussions on the Scheme modelling, and embedded mitigations have also been held with the Environment Agency. The work demonstrates that the scheme will not adversely impact on flood risk, and permits the unimpeded passage of floodwater westwards, as well as retaining sufficient floodwater to not increase flood risk downstream.	
565	Save the Countryside	Active Travel	Transport and congestion have been one of our key concerns already shared relating to the development of North West Cheltenham. The proposed development of Junction 10, Tewkesbury Road and West Cheltenham link road is such a significant piece of investment, the scope should include points of concern already raised as part of the Joint Core strategy. These issues were to be addressed via	No	Approval for development is a local planning authority function but in delivering this Scheme, the Applicant recognises the works are the catalyst for enabling this growth. Whilst the proposed Uckington Park and Ride is part of the Elms Park planning application and outside the scope of the Scheme, the Applicant is liaising with the developers and Local	Approval for development is a local planning authority function but in delivering this Scheme, the Applicant recognises the works are the the catalyst for enabling this growth. Whilst the proposed Uckington Park and Ride is part of the Elms Park planning application and outside the scope of the Scheme, the Applicant is liaising with the developers and Local Planning Authorities to ensure the Scheme takes this into account.

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			the adopted Joint Core Strategy. From this proposal it seems that some key parts are still not yet addressed, and we ask that they are included in the forthcoming transportation plans before any large-scale development is approved in NW Cheltenham: Western Relief Road, Uckington Park and Ride, A fully integrated safe Cycle and Footpath network and Coombe Hill inclusion.		Planning Authorities to ensure the Scheme takes this into account. The Applicant recognises the importance of active travel infrastructure in delivering this scheme and are confident that the high quality, segregated provision across all scheme elements (Junction 10, A4019 and the new West Cheltenham Link Road) will be a key proponent in delivering modal shift for journeys between developments sites in the west and north-west Cheltenham and beyond. The proposals at Coombe Hill still very much remain part of the wider Scheme, but are being proposed via an alternative planning route, taking into account the localised nature of the improvements. Any future proposals for highway infrastructure outside of the Scheme extents have not been considered as part of these works.	The Applicant recognises the importance of active travel infrastructure in delivering this scheme and are confident that the high quality, segregated provision across all scheme elements (Junction 10, A4019 and the new West Cheltenham Link Road) will be a key proponent in delivering modal shift for journeys between developments sites in the west and north-west Cheltenham and beyond. The proposals at Coombe Hill still very much remain part of the wider Scheme, but are being proposed via an alternative planning route, taking into account the localised nature of the improvements. Any future proposals for highway infrastructure outside of the Scheme extents have not been considered as part of these works.
566	Save the Countryside	Active travel	The connection to the existing cycle network is incomplete. Pedestrian and cycle ways should be in place for its entire length to Coombe Hill, not stopping at the	No	The Scheme's funding from Homes England is for work associated with unlocking the three development areas east of Junction 10. The benefits of	The Scheme's funding from Homes England is for work associated with unlocking the three development areas east of Junction 10. The benefits of extending the cycleway

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			Junction 10, but linking up with the wider cycle network.		extending the cycleway to Coombe Hill are recognised, the scale of work required is beyond the scope of what can be delivered under the Scheme.	to Coombe Hill are recognised, the scale of work required is beyond the scope of what can be delivered under the Scheme.
567	Save the Countryside	Design	The proposed Western Relief Road does not provide a full network, as it only goes from a roundabout to another roundabout. It should include the dualling of the B4634. This road encourages traffic to go towards West Cheltenham, but does not provide any connectivity with the large North West Cheltenham Strategic Allocation, named Elms Park in the Planning application 16/02000/OUT for over 4500 homes and ancillary services, effectively a new town on the outskirts of Cheltenham. The designs for the proposed West Cheltenham, are not promoting this, as the road proposed through the site is restricted to 20mph, and is accompanied by a mobility hub, and a bus interchange.	No	The West Cheltenham Link Road will connect to the main road through the West Cheltenham Development. Works within the West Cheltenham Development are for the Developer to bring forward as part of their planning application and outside the scope of this project. The purpose of the Link Road is to provide a connection from the West Cheltenham Development and Junction 10. Traffic modelling indicates that a single carriageway has sufficient capacity to accommodate the West Cheltenham Development. Wider improvements to the B4634 are beyond the scope of the Scheme.	The West Cheltenham Link Road will connect to the main road through the West Cheltenham Development. Works within the West Cheltenham Development are for the developer to bring forward as part of their planning application and outside the scope of this project. The purpose of the Link Road is to provide a connection from the West Cheltenham Development and Junction 10. Traffic modelling indicates that a single carriageway has sufficient capacity to accommodate the West Cheltenham Development. Wider improvements to the B4634 are beyond the scope of the Scheme.
568	Save the Countryside	Design	The scheme is missing the Park and Ride at Uckington which was part of the Joint Core Strategy	Yes	A Park and Ride is currently included in the Elms Park Planning application and is	A Park and Ride is currently included in the Elms Park Planning application and is outside the

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			and the draft Gloucestershire Local Transport Plan. This scheme only supports vehicles leaving Junction 10 to travel to the enlarged Arle Court Park and Ride via the Western Link Road, and the West Cheltenham development. A Park and Ride at Uckington is essential to reduce that amount of traffic using the already overloaded A4019 in both directions and to reduce congestion in the surrounding roads.		outside the scope of this scheme. However, the entrance to this Park & Ride facility has however been included on the latest design to match the developer's design.	scope of this scheme. However, the entrance to this Park & Ride facility has however been included on the latest design to match the developer's design.
570	Save the Countryside	Traffic	The plan does not sufficiently deliver the sustainable transport modes for West and North West Cheltenham. A lack of traffic modelling and assessment information. As there is a lack of this evidence, it is unclear how improving the junction capacity will improve traffic flow, and queuing on the hard shoulder, in the long term, (post the Joint Core Strategy time period) including any additional development that may be planned on the nearby safeguarded for development land. The B4634, Hayden Road/Old Gloucester Road, is a very busy rat run, to the A4019 toward Gloucester and needs to	N/A	Details of traffic modelling were included in the Staged Overview of Assessment Report, which was published as part of the Preferred Route Announcement. The traffic model has been updated and refined as the preliminary design is developed. The Transport Assessment Report is included as part of the Development Consent Order application. Traffic modelling is being used to inform the design to ensure there is suitable capacity on the highway network, including avoiding queues extending back onto the motorway. The	

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			be dualled in its own right, to incorporate the new development at Arle Nurseries for over 200 homes, and the proposed development at West Cheltenham.		Scheme is providing active travel measures and the Applicant continues to review the provision for buses. The traffic modelling takes into account planned and potential developments, including the safeguarded land. The Uncertainty Log in the Traffic Forecasting Report lists the developments considered and included at the time of developing the traffic model. Developments which have emerged since constructing the traffic model or their certainty status has changed would not be explicitly modelled. Given that the overall demand in trip matrices of the traffic model is constrained to Department for Transport forecast for the model area, the overall demand in the study area would not be underestimated.	
571	Save the Countryside	Design	The proposal should clarify any work regarding the reinstatement of the bus shelters along Tewkesbury Road, A4019. We are surprised that the proposal does not acknowledge the fast	Yes	Bus stop locations along the A4019 have been slightly amended in the latest design notably the bus stops now located to the east of Uckington Junction rather than to the west. Although specific	Bus stop locations along the A4019 have been slightly amended in the latest design notably the bus stops now located to the east of Uckington Junction rather than to the west. Although specific details regarding bus shelters are not

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			and efficient bus service from Cheltenham to Tewkesbury.		details regarding bus shelters are not provided in the proposals, space for shelters has been allowed for within the designs.	provided on the drawings, space for shelters has been allowed for within the designs.
572	Save the Countryside	Design	The Uckington Park and Ride Scheme, as well as the Elms Park Transport Hub is absent from these new proposals. It is essential that the scheme can demonstrate that the road network can support such a scheme, to promote these plans for sustainable development. Why is this, when the West Cheltenham Garden scheme indicates both a Transport Hub and a Park and Ride on the A4019?	Yes	A Park and Ride is currently included in the Elms Park planning application and is outside the scope of this scheme. However, the entrance to this Park and Ride facility has been included on the latest design to match the developer's design.	A Park and Ride is currently included in the Elms Park planning application and is outside the scope of this scheme. However, the entrance to this Park and Ride facility has been included on the latest design to match the developer's design.
573	Save the Countryside	Design	We draw your attention to the live planning application for Elms Park Travel Plan 2016. Their proposals for sustainable transport have not been integrated into this consultation.	Yes	A Park and Ride is currently included in the Elms Park planning application and it is outside the scope of this scheme. However, the entrance to this Park and Ride facility has been included on the latest design to match the developer's design.	A Park and Ride is currently included in the Elms Park planning application and is outside the scope of this scheme. However, the entrance to this Park and Ride facility has been included on the latest design to match the developer's design.
574	Save the Countryside	General	We note the Coombe Hill element has been removed, but it in fact this plays a vital part of the whole scheme and should be included in	N/A	The proposals at Coombe Hill still very much remain part of the wider M5 Junction 10 Improvements Scheme, but	

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			the widening of the A4019. As Coombe Hill has been designated a Service Village in the Joint Core Strategy, and there are already several small industrial developments in the locality, as well as a planning application for housing developments approved at the traffic lights, it is unclear if the proposed alterations will be suitable to accommodate the extra traffic usage. Especially as those residents living in the new developments to the West of Tewkesbury will find it easier to travel along the A38, to access the Motorway at Junction 10.		are being proposed via an alternative planning route, taking into account the localised nature of the improvements.	
575	Save the Countryside	Active travel	The junction should incorporate pedestrian and cycle ways running along the whole of the A4019, to encourage sustainable means of transport, for the proposed new developments. The Coombe Hill junction should incorporate a bus interchange and a mobility hub.	No	Extending the cycleway outside the Scheme boundary is beyond the scope of the Scheme. The Applicant investigated options, but these were not included due to available budget. The proposals at Coombe Hill still very much remain part of the wider M5 Junction 10 Improvements Scheme, but are being proposed via an alternative planning route, taking into account the localised nature of the improvements, and therefore	Extending the cycleway outside the Scheme boundary is beyond the scope of the Scheme. The Applicant investigated options, but these were not included due to available budget. The proposals at Coombe Hill still very much remain part of the wider M5 Junction 10 Improvements Scheme, but are being proposed via an alternative planning route, taking into account the localised nature of the improvements, and therefore major non-highway works such as a bus interchange are beyond the scope of that scheme.

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					major non-highway works such as a bus interchange are beyond the scope of that scheme.	
576	Save the Countryside	Design	It is our recommendation that the A4019 should be dualled for the whole of its length, and a new junction created at the Stoke Road/Old Spot Pub to allow for safe access onto the road, and also to the Boddington Road. As this is an accident black spot.	No	The widening of the A4019 west of junction 10 does not form part of the Scheme. Improvements to Junction 10 are considered to indirectly improve the safety issues at the A4019/Stoke Road (Gloucester Old Spot Junction). There are no plans to improve capacity as this is likely to further increase traffic on Stoke Road, which is not desired by the local community.	The widening of the A4019 west of junction 10 does not form part of the Scheme. Improvements to Junction 10 are considered to indirectly improve the safety issues at the A4019/Stoke Road (Gloucester Old Spot Junction). There are no plans to improve capacity as this is likely to further increase traffic on Stoke Road, which is not desired by the local community.
589	Cheltenham & Tewkesbury Cycling Campaign	Active Travel	Cyclists differ as to whether they are comfortable riding with traffic or whether they prefer to be accommodated off-road where possible. Adults of reasonable skill and confidence often find roads easier to handle than many cycle paths. Other people fear being close to motor traffic and for them segregation is preferable so long as it is well-distanced from traffic. Safety is a complex issue but in general there is no	N/A	It is acknowledged that the wide variety of types of cyclists and the non-homogenous needs and wishes of these different users. The key aim of the off-carriageway facilities included in the Scheme is to increase the overall cycling mode share and this is unlikely to be achieved without off-carriageway routes. It is anticipated that the segregated facilities will	It is acknowledged that the wide variety of types of cyclists and the non-homogenous needs and wishes of these different users. The key aim of the off-carriageway facilities included in the Scheme is to increase the overall cycling mode share and this is unlikely to be achieved without off-carriageway routes. It is anticipated that the segregated facilities will encourage new and resurgent cyclists who would otherwise be unlikely to cycle on busy roads

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			evidence that cycling on paths is safer than on roads.		encourage new and resurgent cyclists who would otherwise be unlikely to cycle on busy roads such as the A4019 due to perceived safety issues, before or after the Scheme.	such as the A4019 due to perceived safety issues, before or after the Scheme.
590	Cheltenham & Tewkesbury Cycling Campaign	Active Travel	In the context of the A4019 corridor, almost all cyclists who at present use the road beyond Uckington are relatively experienced riders making longer journeys. They do not cycle the route for any inherent benefit in doing so but in order to reach the road network west of Junction 10 as easily and quickly as possible. There are no settlements of any size for a great distance beyond Junction 10 or places that are destinations for local trips. The potential for journeys along this section of the route by casual or less experienced cyclists or families is therefore very limited and likely to remain so unless and until further development takes place west of Junction 10. There is, however, much potential for more broad-based cycling between Cheltenham and Uckington and the new developments in the area.	No	The difference in levels of cycling and types of cyclists highlighted (west of Uckington and east of Uckington) was identified in the GG 142 assessment process. The process highlighted, when all the proposed development is complete, the change in cycling levels/cyclist type is more likely to be observed at M5 Junction 10 or the top of the West Cheltenham Link Road as development is expected up to that point.	The difference in levels of cycling and types of cyclists highlighted (west of Uckington and east of Uckington) was identified in the GG 142 assessment process. The process highlighted, when all the proposed development is complete, the change in cycling levels/cyclist type is more likely to be observed at M5 Junction 10 or the top of the West Cheltenham Link Road as development is expected up to that point.

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591	Cheltenham & Tewkesbury Cycling Campaign	Active Travel	In an on-line meeting it was pleasing that these distinctions between cyclists (on carriageway and off carriageway) seemed to be recognised. However, this doesn't seem to have been followed through in the plans for Junction 10 in the consultation document.	Yes	This comment is noted. Many of the proposed design amendments using the guidance in Local Transport Note 1/20 were not ready to be included in the Statutory Consultation materials but are being included in the developing preliminary design.	The distinction between on-carriageway and off-carriageway cyclists has been acknowledged throughout the design process. The needs of on-carriageway cyclists have been part of the justification for the removal of roundabout junctions from the Scheme. However, part of the Scheme is the upgrade of a motorway junction and, due to the primary purpose of the junction being for vehicular access to the motorway, the decision has been taken to focus the use of the carriageway on vehicles (including those accessing the motorway) and to focus cycling provision on the off-carriageway facilities. This is acknowledged to be a compromise that would have a detrimental impact upon on-carriageway A4019 cyclists and therefore connections to the off-carriageway facilities have been included. To mitigate this layout for cyclists, carriageway to cycle track transitions have been provided in advance of the M5 Junction 10 roundabout on the A4019 in both directions. A transition has been provided at the signal-controlled Link Road junction to enable

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						<p>cyclists on the A4019 westbound to use the signal-controlled crossing at the junction and access the dedicated cycling facilities on the northern side of the A4019. Cyclists can then use the signal-controlled crossings of the northern slip roads at M5 Junction 10 to safely navigate the junction. A crossing point is provided to the west of M5 Junction 10 to allow cyclists to cross the A4019 and re-join the A4019 westbound via a cycle track to carriageway transition. The crossing point has a central refuge island to make it easier for cyclists to cross. Waymarking signage will be considered at detailed design stage to inform cyclists of the safest route to navigate the M5 Junction 10 roundabout.</p>
592	Cheltenham & Tewkesbury Cycling Campaign	Active Travel	We very much regret the use of a roundabout at this junction. Roundabouts are by far the least safe junction type for two-wheeled vehicles the riders of which are 10 to 15 times more at risk than car occupants. Nearly 50 percent of all accidents at roundabouts involve a two-wheeler and more than half the sites that have clusters of cycle accidents are	No	A roundabout layout has been chosen as it is the only viable junction form for catering for the forecast traffic flows. For off carriageway cyclists there will be signal-controlled crossings of the north-facing slip roads similar to at M5 Junction 9 where records indicate there is not a collision problem for these users. It is	A roundabout layout has been chosen as it is the only viable junction form for catering for the forecast traffic flows. For off carriageway cyclists there will be signal-controlled crossings of the north-facing slip roads similar to at M5 Junction 9 where records indicate there is not a collision problem for these users. It is acknowledged that there are safety

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			<p>roundabouts. In Gloucestershire each year, more than a quarter of all cycling casualties take place at roundabouts and the proportion has increased with the growth in the number and size of roundabouts. The Transport & Road Research Laboratory concluded that, except for grade separation, there is no satisfactory method of providing cyclists with special facilities to negotiate roundabouts. It is inevitable that if this scheme goes ahead in its present form, it will increase cyclist casualties directly as a consequence of its design. This is not compatible with goals to encourage safe cycling.</p>		<p>acknowledged that there are safety concerns for cyclists at roundabouts and the signal control on the entries remove the conflicts between entering vehicles and circulating cyclists. However, it is acknowledged that circulating cyclists would be at risk from exiting vehicles if they were to cut across the cyclist.</p>	<p>concerns for cyclists at roundabouts and the signal control on the entries remove the conflicts between entering vehicles and circulating cyclists. However, it is acknowledged that circulating cyclists would be at risk from exiting vehicles if they were to cut across the cyclist.</p>
593	Cheltenham & Tewkesbury Cycling Campaign	Active Travel	<p>We do not believe that the use of a large roundabout at this junction is in any way compatible with Government or Gloucestershire County Council cycling or climate change policies. The motorway provides the opportunity for drivers to travel fast without having to share space with vulnerable road users. The limits and driving practices of the motorway should not be extended onto the A4019. Although a roundabout will most adversely</p>	No	<p>The junction improvement is intended to cater for the traffic impact of the development and a roundabout is the junction form most suited to this purpose. Whilst it is acknowledged that a green signal for traffic entering the roundabout from the motorway would allow vehicles to enter without stopping the geometry would restrict the entry speeds; this</p>	<p>The junction improvement is intended to cater for the traffic impact of the development and a roundabout is the junction form most suited to this purpose. Whilst it is acknowledged that a green signal for traffic entering the roundabout from the motorway would allow vehicles to enter without stopping the geometry would restrict the entry speeds; this would generally be similar with other junction forms.</p>

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			affect road cyclists, it will also have an impact in creating a hostile environment for people using the cycle path. For everyone the roundabout will be yet another barrier and a deterrent to cycle use.		would generally be similar with other junction forms.	
594	Cheltenham & Tewkesbury Cycling Campaign	Active Travel	<p>In a meeting with the Applicant it was stated that the roundabout would be signalled and that it would be possible for confident cyclists to ride from the entry signals onto the bridge with relative ease. However, the consultation plan suggests that this manoeuvre will be much more fraught, less safe and possibly illegal.</p> <p>Going west, the leftmost lane approaching the roundabout from the A4019 (SE) has markings indicating that its use is only for turning left onto the motorway. Road markings direct this lane exclusively towards the motorway. The second circulatory lane also splits with one arm directing traffic towards the motorway. Cyclists need to be able to go ahead from the leftmost lane approaching the roundabout towards the motorway bridge. But as proposed they will have to cross two lanes of traffic</p>	No	The lane layout on the A4019 westbound approach to M5 Junction 10 roundabout remains the same i.e. lane 1 is for left turning traffic wishing to join the M5 southbound. Lane 2 and 3 will be signed as a straight ahead movement so traffic in Lane 2 should not be intending to join the M5 southbound slip road. The 2-lane exit for the M5 southbound slip road is for the circulatory traffic which would be on a red signal when the A4019 westbound entry is on green. It is acknowledged that the preference for cyclists would be for Lane 1 to be a straight ahead and left turn movement however the proposed layout was required to cater for the forecast traffic movements. To mitigate this layout for cyclists, carriageway to cycle track transitions have	The lane layout on the A4019 westbound approach to M5 Junction 10 roundabout remains the same i.e. lane 1 is for left turning traffic wishing to join the M5 southbound. Lane 2 and 3 will be signed as a straight ahead movement so traffic in Lane 2 should not be intending to join the M5 southbound slip road. The 2-lane exit for the M5 southbound slip road is for the circulatory traffic which would be on a red signal when the A4019 westbound entry is on green. It is acknowledged that the preference for cyclists would be for Lane 1 to be a straight ahead and left turn movement however the proposed layout was required to cater for the forecast traffic movements. To mitigate this layout for cyclists, carriageway to cycle track transitions have been provided in advance of the M5 Junction 10 roundabout on the A4019 in both directions. A

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			<p>accelerating towards the motorway, with neither priority nor protection. This is foreseeably a lethal situation where serious accidents will occur.</p> <p>To provide a minimum of protection for confident cyclists riding ahead, all the lanes on the circulatory road should go onto the bridge, with drivers having to consciously turn left from these lanes in order to reach the motorway. This would cause no additional delay to motor traffic but would prevent cyclists having to ride in violation of the markings and it could offer them some modest priority (and thereby protection) over motorway traffic.</p> <p>The approach to the roundabout from the A4019 (NW) is better in that the left most approach lane is marked for both left-turning and ahead traffic. Also broken lines lead from the left most lane onto the bridge. Cyclists who adopt the primary riding position on the approach stand a much better chance of avoiding a left hook by a following driver. At the very least, the westbound approach should be laid out similar to the eastbound.</p>		<p>been provided in advance of the M5 Junction 10 roundabout on the A4019 in both directions. A transition has been provided at the signal-controlled Link Road junction to enable cyclists on the A4019 westbound to use the signal-controlled crossing at the junction and access the dedicated cycling facilities on the northern side of the A4019. Cyclists can then use the signal-controlled crossings of the northern slip roads at M5 Junction 10 to safely navigate the junction. A crossing point is provided to the west of M5 Junction 10 to allow cyclists to cross the A4019 and re-join the A4019 westbound via a cycle track to carriageway transition. The crossing point has a central refuge island to make it easier for cyclists to cross.</p> <p>Waymarking signage will be considered at detailed design stage to inform cyclists of the safest route to navigate the M5 Junction 10 roundabout.</p>	<p>transition has been provided at the signal-controlled Link Road junction to enable cyclists on the A4019 westbound to use the signal-controlled crossing at the junction and access the dedicated cycling facilities on the northern side of the A4019. Cyclists can then use the signal-controlled crossings of the northern slip roads at M5 Junction 10 to safely navigate the junction. A crossing point is provided to the west of M5 Junction 10 to allow cyclists to cross the A4019 and re-join the A4019 westbound via a cycle track to carriageway transition. The crossing point has a central refuge island to make it easier for cyclists to cross. Waymarking signage will be considered at detailed design stage to inform cyclists of the safest route to navigate the M5 Junction 10 roundabout.</p>

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598	Cheltenham & Tewkesbury Cycling Campaign	Active Travel	The cycle track both on the bridge and leading to it is too close to the carriageway and will create an unpleasant environment. In particular, riding west cyclists will be closer to oncoming traffic than is hardly ever the case on a road. People who fear cycling close to motor vehicles are not going to be accommodated by this design.	No	The wide-ranging needs of cyclists are noted and consideration of greater separation between the cycle facility and carriageway has been investigated. The considerable additional expense of a wider structure over the motorway has been hard to justify within a fixed scheme budget. Additional land and earthworks for greater separation would need to be strongly evidenced to be accepted as part of the Development Consent Order process. It is believed that a balance has been struck to allow the facility to be included in the Scheme.	The wide-ranging needs of cyclists are noted and consideration of greater separation between the cycle facility and carriageway has been investigated. The considerable additional expense of a wider structure over the motorway has been hard to justify within a fixed scheme budget. Additional land and earthworks for greater separation would need to be strongly evidenced to be accepted as part of the Development Consent Order process. It is believed that a balance has been struck to allow the facility to be included in the Scheme.
599	Cheltenham & Tewkesbury Cycling Campaign	Active Travel	East of the roundabout the cycle track should be routed via the adjacent development in order to gain greater separation from the road.	No	As this development land currently only has safeguarded status this aspiration cannot be relied upon. It is hoped that in the future a route will be created as noted in this comment.	As this development land currently only has safeguarded status this aspiration cannot be relied upon. It is hoped that in the future a route will be created as noted in this comment.
600	Cheltenham & Tewkesbury Cycling Campaign	Active Travel	At the western end of the crossing of the M5 on-slip the cycle track makes a 90 degree left turn. The radius should not be less than the	Yes	This layout has been developed in the proposals to avoid this issue.	This layout has been developed in the proposals to avoid this issue.

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			minimum recommended radius of 4 metres, preferably greater.			
601	Cheltenham & Tewkesbury Cycling Campaign	Active Travel	Riding east, cyclists will not be able to see traffic behind them as they approach the on-slip crossing. Although this may appear to be unnecessary as there will be a signal controlled crossing, it is always essential that cyclists should be able to see all about them that it is safe to cross before moving off. Their safety should not depend upon others obeying the rules.	Yes	The angle of approach, as well as the radius, has been amended in the latest design to improve visibility for cyclists approaching the crossing point.	The angle of approach, as well as the radius, has been amended in the latest design to improve visibility for cyclists approaching the crossing point.
602	Cheltenham & Tewkesbury Cycling Campaign	Active Travel	To resolve these problems may require additional land take north of the on-slip road crossing to provide a gentler and better aligned approach.	No	Earthwork extents and land take issues are critical in achieving a balance between provision, cost, and impact upon the environment and landowners. The Development Consent Order process will consider if the correct balance has been achieved.	Earthwork extents and land take issues are critical in achieving a balance between provision, cost, and impact upon the environment and landowners. The Development Consent Order process will consider if the correct balance has been achieved.
603	Cheltenham & Tewkesbury Cycling Campaign	Active Travel	Access to the off-road facilities will be indirect and probably not intuitive for cyclists arriving on the road from Cheltenham. The cycle facilities proposed for crossing the A4019 do not appear to be convenient for these people to use.	Yes	A carriageway to cycle track transition has been provided on the A4019 westbound for cyclists approaching the signal-controlled junction at Gallagher Retail Park. The transition will allow on-carriageway cyclists to transition from the A4019 to	A carriageway to cycle track transition has been provided on the A4019 westbound for cyclists approaching the signal-controlled junction at Gallagher Retail Park. The transition will allow on-carriageway cyclists to transition from the A4019 to the crossing point at the junction, where they

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
					the crossing point at the junction, where they will be able to cross to the northern side of the A4019 in order to use the dedicated off-carriageway cycle facilities. It is also noted that shared use paths are proposed on either side of the A4019 to the east of Gallagher Retail Park junction to provide consistency with the Elms Park Development proposals.	will be able to cross to the northern side of the A4019 in order to use the dedicated off-carriageway cycle facilities. It is also noted that shared use paths are proposed on either side of the A4019 to the east of Gallagher Retail Park junction to provide consistency with the Elms Park Development proposals.
604	Cheltenham & Tewkesbury Cycling Campaign	Active Travel	It is not clear how cyclists riding west are supposed to re-join the A4019 following the roundabout. They will need at least a central refuge by which to turn right on to the main road safely.	Yes	Facilities are now included in the scheme design, and these would incorporate a central refuge. The design was in abeyance due to uncertainty about the western extent of the Scheme.	Facilities are now included in the scheme design, and these would incorporate a central refuge. The design was in abeyance due to uncertainty about the western extent of the Scheme.
605	Cheltenham & Tewkesbury Cycling Campaign	Active Travel	This is the kind of design that has proved universally unpopular with cyclists and is little used in most places where it has been provided in Gloucestershire.	No	Within the limited corridor available for this Scheme, given the existing constraints and development boundaries, the proposal is intended to provide a direct arterial route for utility journeys along a recognisable corridor. It is hoped that other routes away from major roads will be provided in the neighbouring developments.	Within the limited corridor available for this Scheme, given the existing constraints and development boundaries, the proposal is intended to provide a direct arterial route for utility journeys along a recognisable corridor. It is hoped that other routes away from major roads will be provided in the neighbouring developments.

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606	Cheltenham & Tewkesbury Cycling Campaign	Active Travel	The cycle track is too close to the road and crosses too many side roads where cyclists are likely to have to stop. The maintenance of momentum is important for cycling to be comfortable.	No	Providing greater separation from the carriageway has not been possible within the constraints of this highway scheme. Routes through the developments are outside the scope of the highway scheme but would be more appealing from less confident cyclists.	Providing greater separation from the carriageway has not been possible within the constraints of this highway scheme. Routes through the developments are outside the scope of the highway scheme but would be more appealing from less confident cyclists.
607	Cheltenham & Tewkesbury Cycling Campaign	Active Travel	More confident cyclists are unlikely to use the cycle track because it is too convoluted, slow and less safe than riding on the road with the priority of traffic. People who value their time are not going to appreciate multiple crossings of the A4019 or side roads.	No	Waiting times for cyclists and pedestrians have been minimised wherever possible. The option to include greater priority for cyclists and pedestrians at signal-controlled junctions remains possible with the final preliminary design not precluding amendments at detailed design. Options such as 'hold the left turn' and cyclists/pedestrians proceeding east-west alongside the A4019 whilst through traffic is on green have been explored but would have a detrimental impact upon junction operation for traffic.	Waiting times for cyclists and pedestrians have been minimised wherever possible. The option to include greater priority for cyclists and pedestrians at signal-controlled junctions remains possible with the final preliminary design not precluding amendments at detailed design. Options such as 'hold the left turn' and cyclists/pedestrians proceeding east-west alongside the A4019 whilst through traffic is on green have been explored but would have a detrimental impact upon junction operation for traffic.
608	Cheltenham & Tewkesbury	Active Travel	Less confident people are also not likely to make much use of the facility because of the	No	Routes through the developments may be included by the developers	Routes through the developments may be included by the developers and would be expected to provide

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	Cycling Campaign		unpleasantness of riding so close to traffic. Westbound cyclists in particular will be closer to oncoming motor traffic than on the road so people who fear traffic are going to have their fears heightened rather than reduced.		and would be expected to provide a more appealing, but possibly less direct, route. The route alongside the A4019 would be direct for journeys along the A4019.	a more appealing, but possibly less direct, route. The route alongside the A4019 would be direct for journeys along the A4019.
609	Cheltenham & Tewkesbury Cycling Campaign	Active Travel	Geometry at junctions is poor. Sightlines and turning radii appear unacceptable. Signal control of crossings will add further delay unless cyclists can cross in a single phase and there is automatic actuation of the cycle phase on the approaches.	Yes	The geometry design has been developed at the crossings to improve sightlines and turning radii for cyclists. Single stage phasing has been incorporated where possible however due to the forecast traffic flows and movements was not possible at all crossing points. The traffic signals design has aimed to minimise waiting times for cyclists/pedestrians.	The geometry design has been developed at the crossings to improve sightlines and turning radii for cyclists. Single stage phasing has been incorporated where possible however due to the forecast traffic flows and movements was not possible at all crossing points. The traffic signals design has aimed to minimise waiting times for cyclists/pedestrians.
610	Cheltenham & Tewkesbury Cycling Campaign	Active Travel	The shared footways around Uckington are inappropriate, unnecessary and unsafe. This could be mitigated to some extent by cyclists using the access roads.	Yes	The Scheme design has been updated to provide segregated walking and cycling facilities alongside the A4019 through Uckington.	The Scheme design has been updated to provide segregated walking and cycling facilities alongside the A4019 through Uckington.
611	Cheltenham & Tewkesbury Cycling Campaign	Active Travel	Some off-road facility from Manor Road to Uckington would be useful to enable less confident riders and families to reach the lanes and new development around Uckington, but it will need	No	Improvements on the A4019 east of the Gallagher Retail Park Junction are outside the scope of this scheme. However, the Elms Park Development has various	Improvements on the A4019 east of the Gallagher Retail Park Junction are outside the scope of this scheme. However, the Elms Park Development has various

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			to be further from the carriageway and to a much higher standard than proposed to be acceptable.		improvement proposals included in their planning application.	improvement proposals included in their planning application.
612	Cheltenham & Tewkesbury Cycling Campaign	Active Travel	The international 'bible' on designing for cyclists, The Design Manual for Bicycle Traffic, emphasises the importance of adequate segregation verges where cycle tracks are placed near to roads, for both comfort of cycling and safety. For roads with a high traffic volume (such as the A4019), the minimum recommended width for a segregation verge is 8 metres, with 10 metres preferred. This standard of design not only makes cycle tracks more pleasant and attractive to use but significantly benefits safety at side roads (where it is easier to provide good sightlines) and minimises dazzle from oncoming headlights at night (and also dazzle of motorists by cyclists using powerful modern cycle lights). Hedging between the cycle path and road away from junctions can be used to further enhance paths by shielding cyclists from traffic and wind. In our view, the location of the cycle track along the A4019 is much too	No	Where a highway scheme is upgrading an existing route there are naturally significant constraints created by existing housing, businesses, and junctions. Whilst the promoted 8-10m segregation is understandably more attractive the corridor within which the scheme must fit does not allow for this. The routes included in the Scheme are direct; we are using the guidance in Local Transport Note 1/20 to maximise opportunities for cyclist and pedestrian priority over traffic where these may be possible. Routes within the adjacent developments would be hoped to provide the more attractive routes described.	Where a highway scheme is upgrading an existing route there are naturally significant constraints created by existing housing, businesses, and junctions. Whilst the promoted 8-10m segregation is understandably more attractive the corridor within which the scheme must fit does not allow for this. The routes included in the Scheme are direct; we are using the guidance in Local Transport Note 1/20 to maximise opportunities for cyclist and pedestrian priority over traffic where these may be possible. Routes within the adjacent developments would be hoped to provide the more attractive routes described.

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			close to the carriageway and a major and fundamental failing of the design which will minimise its use.			
613	Cheltenham & Tewkesbury Cycling Campaign	Active Travel	We acknowledge that the junctions at either end of the link road are to be signal-controlled crossroads rather than roundabouts. This will make them safer and easier to handle for cyclists.	N/A	This comment is noted. The changes in layout were as a direct result of the consideration of the safety of cyclists.	This comment is noted. The changes in layout were as a direct result of the consideration of the safety of cyclists.
614	Cheltenham & Tewkesbury Cycling Campaign	Active Travel	We agree that it would be opportune to provide a cycle track along this corridor to encourage broad-based cycling between the housing and commercial developments. However, this must be well spaced from the road. The present proposal for a cycle track immediately adjacent to the Link Road is not acceptable.	No	This comment is noted. Although proposals run adjacent to the carriageway the design will include a level of verge separation between the cycleway and carriageway. There will also be further separation between the cycleway and footway.	This comment is noted. Although proposals run adjacent to the carriageway the design will include a level of verge separation between the cycleway and carriageway. There will also be further separation between the cycleway and footway.
615	Cheltenham & Tewkesbury Cycling Campaign	Active Travel	To access development along the Link Road a cycle route within the development (perhaps central within the development grid) could be more useful than one along the Link Road.	No	At present there are no development plans along the West Cheltenham Link Road and a route alongside is the only option.	At present there are no development plans along the West Cheltenham Link Road and a route alongside is the only option.
616	Cheltenham & Tewkesbury	Active Travel	The junction at the north end of the Link Road seems excessively complicated with 4 or 5 lanes on	N/A	The comment is noted. Whilst the Scheme is being funded by Homes England to provide	

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	Cycling Campaign		three approaches. This will be a very hostile environment for cycling on road or on the cycle facilities, especially when turning. This kind of 'large tarmac' design is inappropriate for a modern urban area and is not sympathetic to environmental or climate change goals.		access to and from the developments, a balance between pedestrians and cyclists and vehicles entering and exiting the developments is being sought.	
617	Cheltenham & Tewkesbury Cycling Campaign	Active Travel	It is not possible to comment further on the Link Road, its accesses or the southern junction without knowing more about the nature of the development that is to take place in the area.	N/A	The West Cheltenham development is allocated for a mix of housing and commercial development. The Scheme has no further detail as this is for the developers to put forward as part of their planning applications.	
618	Cheltenham & Tewkesbury Cycling Campaign	Active Travel	This road should remain fully accessible to cyclists, for whom it may provide more pleasant cycling conditions than along the Link Road. Closing this road as a through route for motor vehicles would enhance the quality of the environment; we are unconcerned about exactly where the road is closed so long as the closure arrangements do not impede cycle passage.	No	Withybridge Lane is to be retained as a through road for all traffic. There are no plans for any traffic calming as part of the Scheme.	Withybridge Lane is to be retained as a through road for all traffic. There are no plans for any traffic calming as part of the Scheme.
619	Cheltenham & Tewkesbury	Active Travel	This scheme will lead to more and faster motor traffic not just along	N/A	It is acknowledged that the nature of the scheme is likely	It is acknowledged that the nature of the scheme is likely to make the

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	Cycling Campaign		its course but also continuing into the centre of Cheltenham and along all connecting roads. The impact on cycling will be overwhelmingly negative; it is simply not possible to encourage cycling and to facilitate more and faster motoring at the same time.		to make the environment for on-road cyclists less appealing. Providing a direct off-carriageway segregated cycle lane running alongside the A4019 will provide safe facilities that should encourage usage for cyclists of all abilities.	environment for on-road cyclists less appealing. Providing a direct off-carriageway segregated cycle lane running alongside the A4019 will provide safe facilities that should encourage usage for cyclists of all abilities.
620	Cheltenham & Tewkesbury Cycling Campaign	Active Travel	Confident cyclists may be able to cope with most of the changes proposed for the A4019, but that does not mean that they will find it pleasant to do so. The roundabout at Junction 10, and particularly the design of the south east approach, can be reliably predicted to increase accident risk and will likely discourage cycling in this direction.	No	It is acknowledged that the nature of the scheme is likely to make the environment for on-road cyclists less appealing. Providing a direct off-carriageway segregated cycle lane running alongside the A4019 will provide safe facilities that should encourage usage for cyclists of all abilities.	It is acknowledged that the nature of the scheme is likely to make the environment for on-road cyclists less appealing. Providing a direct off-carriageway segregated cycle lane running alongside the A4019 will provide safe facilities that should encourage usage for cyclists of all abilities.
621	Cheltenham & Tewkesbury Cycling Campaign	Active Travel	The proposed cycle tracks are much too close to the roads to make for a pleasant environment and are unlikely to meet the needs of people who wish to cycle away from traffic. It does not provide an alternative route to the A4019 that is equivalent in ease of use, speed, maintenance of momentum or safety. It would appear that important criteria do	No	Local Transport Note 1/20 is being used to support the development of the cycle facilities design within the constraints placed upon the Scheme. It is hoped the adjacent developments will provide facilities for cyclists wishing to cycle away from traffic.	Local Transport Note 1/20 is being used to support the development of the cycle facilities design within the constraints placed upon the Scheme. It is hoped the adjacent developments will provide facilities for cyclists wishing to cycle away from traffic.

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			not meet the requirements of Local Transport Note 1/20 let alone the more stringent requirements of the Design Manual for Bicycle Traffic that have been shown to be essential to cycling becoming a popular, practical and safe mode of transport.			
633	Stagecoach West	Traffic	All this will be the concern of a review of the Joint Core Strategy, that is currently progressing, relatively slowly. The appropriateness of bringing forward further large scale development will need to be evidenced and set against other reasonable options, if the due process laid down by the National Planning Policy Framework and separate legislative instruments is to be duly followed. There is a degree of uncertainty what the final position will be, in terms of the development quantum and mix that will be facilitated and directly served by the scheme. The current highways proposals, being committed improvement to the network, will form part of the baseline position for the transport evidence base behind the Joint Core Strategy Review. This will	N/A	The Applicant undertook initial operational modelling for the M5 Junction 10 Scheme. Improvements to the A4019 east of the Gallagher Junction are outside the scope of the Scheme as they are included the Elms Park Development planning application. The Applicant is working with the Local Planning Authorities and the Elms Park developer on elements that the M5 Junction 10 Improvements scheme can provide and those to be provided by others.	

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			involve further substantial transport modelling of the transport and mobility demands associated with various options. However, this modelling including an updated Strategic Transport Model, and a more locally focused PARAMICS micro-simulation has not yet been finalised or published. We understand that the PARAMICS model is under the stewardship of National Highways, and covers a wider part of the highways network west of Cheltenham. The Applicant in advancing this scheme, has taken a smaller section of this model, that is quite closely bounded by the scheme extent. As a result, while the operation of the Scheme itself can be expected to be reasonably well understood, there is no evidence available on what the consequential issues will be to the east and south of the scheme itself, where some of the most serious current problems on the local network currently exist.			
634	Stagecoach West	General	Stagecoach West recognise that exactly synchronising the advancement of a major highways scheme like this, in parallel with the advancement of a major	N/A	As with all planning policy applicable to the M5 Junction 10 Improvements Scheme, the current status of the Joint Core Strategy review and the	

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			<p>review of a strategic plan, and a supporting transport strategy for that, is practically impossible. However, the nature of the proposals, their effects and the likely wider reverberations around the local network immediately beyond the project boundary, demand a very careful examination at this stage. This would both help to inform the evidence base for the Joint Core Strategy review, and also to ensure that in improving traffic capacity and network connectivity in a limited portion of the network, this does not lead to seriously perverse and deleterious outcomes for network operation and bus services over a much wider area.</p>		<p>relevant weight that should be given to any considerations are constantly being reviewed. The Applicant is in constant dialogue with the relevant planning authorities for the Joint Core Strategy review in order to ensure that potential Joint Core Strategy or Scheme updates are as aligned as is reasonably practicable. With regards to the careful examination of the Scheme proposals and their potential effects on the local highway network it should be noted that the Joint Core Strategy Local Authorities have been consulted throughout the Scheme's development, including the statutory consultation process, and will continue to be consulted on the Scheme.</p>	
635	Stagecoach West	General	<p>The proposals overlay the submitted proposals to access the Elms Farm site, which straddles the boundary between Tewkesbury Borough and Cheltenham Districts as Local Planning Authorities. These applications remain undetermined. Stagecoach have</p>	N/A	<p>The Development Consent Order application addresses the Scheme's compliance with both national and local planning policy including policies within the Joint Core Strategy and Local Authority Transport Planning Policy. There is a degree of overlap</p>	

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			<p>been informed by the Applicant that the detailed design of this part of the scheme, between Uckington and the Gallagher Retail Park junction, remain under review, and negotiation with the Elms Park applicants, such that there is a possibility that an alternative agreed solution that reflects the access and movement strategy for that allocation can be effected in line with adopted Joint Core Strategy and Local Transport Plan Policy. Very importantly, these policies should be considered to be material considerations in determining the Development Consent Order Application. It would be entirely perverse if, being advanced to help bring forward allocated development land, the delivery of this highway infrastructure precluded or in any way undermined the achievement of a policy-compliant transport strategy, including mode shift towards sustainable transport, for the largest single development within the Joint Core Strategy. Key elements of those proposals include: a local Intermodal Interchange at Uckington, including convenient access to</p>		<p>between the M5 Junction 10 Scheme and the Elms Park Development planning application. The Applicant is working with the local planning authorities and the Elms Park developer on elements that the M5 Junction 10 Improvements scheme can provide and those to be provided by others. This includes a review of bus provisions for opening year and options that would allow for future provision to coincide with the delivery phasing of the Development Sites.</p>	

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			<p>intercept eastbound car-borne movements and the most efficient possible access by bus to and from this facility in both directions; priority bus access from the development onto the A4019 west of the Gallagher junction; and bus priority towards and from the east along the A4019 Tewkesbury Road.</p> <p>It is essential that the scheme facilitates within its extent, all these elements as far as it can. The Scheme under consultation does not do so. This is a serious concern.</p>			
637	Stagecoach West	Traffic	<p>Even at the time the Joint Core Strategy Examination in Public was reaching its conclusion in early 2016, the “Transport Evidence Base” had concluded for all the modelled scenarios, substantial mode shift away from single occupancy car use was required for the development needs of the area to avoid creating unacceptable traffic impacts. This was equally true of scenarios that included the provision of an all-movements M5 Junction 10 and a new highways link between the A4019 and A40. The strategy that involves the</p>	N/A	<p>The Scheme has undertaken traffic modelling in accordance with national guidance. However, the need for modal shift in transport provision is recognised. The Scheme includes high quality active travel facilities. The Applicant is continuing to examine bus provisions, including options that would allow for future provision to coincide with the delivery phasing of the Development Sites. The Applicant is working with the local planning authorities on elements that the Scheme can</p>	

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			construction of the proposed works requires mode shift, to work. It does not replace the need to secure that mode shift. Without this mode shift taking place the proposed works cannot be expected to appropriately or adequately address the growing demands on the network on their own.		provide and those outside the scope of the Scheme, which therefore need to be provided by others. Further detail will be provided as part of the Development Consent Order Submission.	
640	Stagecoach West	Traffic	In parallel with this government is taking new and much more vigorous steps to support a national mode shift to active travel and public transport modes. Facilitating existing levels of single occupancy car use cannot be justified, but this requires a marked improvement in the relevance and quality of alternatives, including bus services. Nevertheless, the Applicant should very carefully consider the appropriateness and necessity of incorporating high quality bus infrastructure and bus priority where appropriate within the Scheme extents. This is a context where there already is a relatively high level of existing bus movements, both along and through the Scheme. The immediate locality is one where	N/A	The Applicant is continuing to examine bus provisions, including options that would allow for future provision to coincide with the delivery phasing of the Development Sites. The Applicant is working with the local planning authorities on elements that the Scheme can provide and those outside the scope of the Scheme, which therefore need to be provided by others. Further detail will be provided as part of the Development Consent Order Submission.	

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			<p>demand for movement can be expected to grow very substantially, being the largest concentration of employment and residential development anticipated anywhere in the County, and is perhaps unprecedented. The evidence before the Applicant already makes plain that planning infrastructure on the basis of maintaining the same car mode share in this area is completely impractical, even if it were desirable and in conformity with national and local policy. It is not. We are thus very disappointed that the published scheme makes no clear provision for bus priority, nor does it make any attempt to explain the rationale for the design approach taken, especially within the Cheltenham urban area, and along the key Uckington-Gallagher frontage.</p>			
647	Stagecoach West	Design	<p>There are two existing pairs of bus stops on this part of the scheme: "Stanboro Lodge", west of the junction, and Withy Bridge Gardens to the east. West of the M5, there is another existing pair of stops at the "Gloucester Old Spot", which are about 400m to</p>	Yes	<p>The Scheme design does not include replacement of the existing Stanboro Lodge bus stops. The Scheme includes a proposed 2m wide shared use path on the northern side of the A4019 which would provide facilities for pedestrian</p>	<p>The Scheme design does not include replacement of the existing Stanboro Lodge bus stops. The Scheme includes a proposed 2m wide shared use path on the northern side of the A4019 which would provide facilities for pedestrian and cyclists between</p>

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			the West of the Stanboro' Lodge stops. Given that this part of the A4019 will be dualled, and the current stops have virtually no hinterland, it would be appropriate to delete the Stanboro' Lodge stops, and improve the pedestrian facilities along the existing historic redundant carriageway to the west to tie into the facilities to the west. These should be upgraded, and a safe pedestrian crossing installed – something that would not be practical or justified further east.		and cyclists between Stanboro Lodge and Gloucester Old Spot. There are no current proposals to improve A4019 pedestrian crossing facilities at the Gloucester Old Spot as this is outside the scope of the current Scheme.	Stanboro Lodge and Gloucester Old Spot. There are no current proposals to improve A4019 pedestrian crossing facilities at the Gloucester Old Spot as this is outside the scope of the current Scheme.
648	Stagecoach West	Design	East of the M5, the “Withy Bridge Gardens” stops will be redundant and replacing them would serve no useful purpose.	N/A	There are no proposals to replace the existing Withybridge Garden bus stops within the Scheme.	There are no proposals to replace the existing Withybridge Garden bus stops within the Scheme.
649	Stagecoach West	Active Travel	The signalisation of the scheme is intended to allow easy use by pedestrians, cyclists, and other Non-Motorised Users. The junction nevertheless sits in open countryside a considerable distance from any substantial settlement and while Cheltenham is expected to expand substantially towards the M5, it is far from clear what the major trip generating destinations are, or will be on the west of the junction,	N/A	Facilities across Junction 10 for pedestrians and cyclists have been included to prevent the new junction being an obstacle to these users. A connection to walking routes and on-carriageway cycling to the west of the M5 is seen as a worthwhile provision. Future development plans cannot be guessed and retrofitting facilities would be complicated.	Facilities across Junction 10 for pedestrians and cyclists have been included to prevent the new junction being an obstacle to these users. A connection to walking routes and on-carriageway cycling to the west of the M5 is seen as a worthwhile provision. Future development plans cannot be guessed and retrofitting facilities would be complicated.

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			within convenient walking or cycling distance from origins on the eastern side.			
651	Stagecoach West	Design	As proposed, the Scheme provides the initial element of much a link to a standard that should facilitate that kind of public transport connectivity in due course. The link passes through open countryside and given there is no hinterland either side, nor is there any built development envisaged (the area remains within the Green Belt) there is no need for bus stops to be provided.	N/A	No bus stops are being provided on West Cheltenham Link Road.	No bus stops are being provided on West Cheltenham Link Road.
657	Stagecoach West	Design	A large number of private accesses to the mainline are to be replaced by a variety of means including accommodation roads and new connections that will allow some properties to be serviced better from behind. Two new service road lengths are to be provided south of the new road west of Cooks Lane, and between Hayden Road and Homecroft Drive, the latter re-using some of the current carriageway. A service/accommodation road north of the route will be provided east of Uckington. To achieve this demands a substantial land	No	It is noted that it appears the Scheme is taking a “maximalist” approach with the provision of the two new service roads. However, these are considered essential mitigation for residents with direct accesses onto A4019. The alternative option of making residents turn right across the new dual carriageway is considered inappropriate from both safety and operational aspects.	It is noted that it appears the Scheme is taking a “maximalist” approach with the provision of the two new service roads. However, these are considered essential mitigation for residents with direct accesses onto A4019. The alternative option of making residents turn right across the new dual carriageway is considered inappropriate from both safety and operational aspects.

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			acquisition and, from what can be established, the demolition of several properties mainly on the south side of the existing road. Substantial horticultural structures and associated property at what was The Plant Centre north of the A4019 within the Elms Park application redline has already been cleared. It is apparent then, that the proposals are taking a quite “maximalist” approach having regard to the existing public highway and adjoining property. There is little evidence that the designers have had to make many compromises on the grounds of availability of land.			
660	Stagecoach West	Traffic	New bus stops are proposed at Uckington, west of the village rather than immediately east as today. They will be on-carriageway featuring only a cage and, from what we can discern, a flag and paved boarder. Given the volume of traffic on the road, and its likely high speeds, we have some concerns that these present safety concerns, related to rear-end collisions, and the lack of obvious provision for pedestrians to cross the A4019 also ought to raise safety concerns. The	Yes	This comment is noted. The provision of bus lay-bys has been investigated and it was decided to locate these to the east of the proposed Uckington junction, which will be close to the signal control crossing facilities and within the 40mph speed limit.	This comment is noted. The provision of bus lay-bys has been investigated and it was decided to locate these to the east of the proposed Uckington junction, which will be close to the signal control crossing facilities and within the 40mph speed limit.

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			distance from signalised junctions and the village to the east in particular reflects that Design Manual for Roads and Bridges standards have been used to site the stops upstream from the junction. The standard relates to the speed limit, which here we understand will be around the point that a 50mph limit transitions to 40 mph. The result is that the stops sit in open countryside, and given the context Stagecoach consider that a departure from standards would be justified, especially given that signals exist a short distance downstream eastbound. This would justify moving the stops towards the village. Irrespective, while there is no blanket objection to on-line stops on 40mph roads, this is context dependent. This road is intended to be a high volume dual carriageway in an extra-urban context. We therefore consider that for these stops, laybys should be provided, again in line with Design Manual for Roads and Bridges.			
666	Stagecoach West	Design	However there is a wider and much bigger question, in the light of the wider Elms Park proposals	Yes	A Park and Ride is currently included in the Elms Park planning application and	A Park and Ride is currently included in the Elms Park planning application and therefore is outside

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			<p>and access strategy, including a “Transport Hub” within the Elms Park site, as to whether this arrangement is optimal or appropriate. This “Transport Hub” has featured in Gloucestershire County Council Policy for many years in one form or another and the Council has re-stated its commitment to seeing this implemented in the current Local Transport Plan, adopted in Spring 2021. The Uckington Local Multi-modal Interchange facility was characterised as a Park and Ride in previous Local Transport Plan iterations. The Elms Park applicant has set aside land for the “Transport Hub” within their control, north of the A4019. Although there has long been some uncertainty as to exactly the nature and scale of the facility a vehicular access at least into the site from the A4019, is also anticipated at this point. There is no sign or acknowledgement of this on the proposals. This omission is of great concern to Stagecoach. The Hub is proposed somewhat to the west of the proposed stops: indeed rather unfortunately sits midway between the two proposed bus</p>		<p>therefore is outside the scope of this scheme. However, the entrance to this Park and Ride facility has been included on the latest design to match the developer's design.</p>	<p>the scope of this scheme. However, the entrance to this Park and Ride facility has been included on the latest design to match the developer's design.</p>

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			<p>stops within the Scheme with those west of Uckington proposed. Although these stops sit far enough distant upstream to stand alone without dependency, there is a clear case to consider whether any bus stops serving the Hub, which we would anticipate would be on the A4019, should in effect replace those west of Uckington, especially since the hinterland for these will largely be the village itself. Given that the “Transport Hub” is in a live planning proposal and is reflected in local policy, this absence is very strange. The facility is intended to intercept and consolidate a large number of peak journeys, by a number of means, which could include, for example, car-sharing as well as traditional park and ride. In stark contrast a heavily engineered new junction is proposed further west within the project to provide a lavish standard of vehicular access to land with no formal planning status and subject to no planning application, although it has been set aside for longer-term development at an indeterminate point beyond the Joint Core Strategy plan period</p>			

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			ending in 2031. Substantial detailed further work is needed to establish the nature of the access and egress from the Elm Park Local Multi-modal Interchange, including bus stopping arrangements that relate directly to it. There is sufficient offset from the proposed stops east of Homecroft Lane that these may be additional to or in place of the stops west of Uckington village.			
667	Stagecoach West	Design	We are content that even with stops upstream at the multi modal interchange, the bus stops proposals under consultation should be taken forward. However these arrangements need significant detailed rework.	yes	The comments are noted and have been taken into consideration when liaising on the Park and Ride with developers and Local Planning Authorities.	The comments are noted and have been taken into consideration when liaising on the Park and Ride with developers and Local Planning Authorities.
668	Stagecoach West	Design	The proposals replace bus stop lay-bys with on-line stops. This is inappropriate on a heavily trafficked dual carriageway which we understand will have a 40 mph limit at this point. The stops could well be quite heavily used, and would be likely to block the flow of traffic for lengths of time sufficient to cause driver frustration, leading to a risk of dangerous lane changes. To the putative objection that buses would not be	Yes	Full 3.5m wide bus stop lay-bys have been included to the east of Safeguarded Site access junction. On-line bus stops are proposed to the east of Uckington Junction due to space constraints.	Full 3.5m wide bus stop lay-bys have been included to the east of Safeguarded Site access junction. On-line bus stops are proposed to the east of Uckington Junction due to space constraints.

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			able to leave the lay-by without excessive delay, it is sufficient to point out that natural breaks in traffic flow would be occasioned by new signals immediately west. Eastbound in particular there appears to be ample space to incorporate, at the very least, a 2m wide “partial pull in”, if not a full 3.5m wide layby, with standard geometry tapers. Whether this can be achieved westbound while also providing a suitable boarding area between the kerb and the service road, is something Stagecoach urge the design team to take best endeavours to resolve.			
669	Stagecoach West	Design	In both directions the stops will require what is close to being an “Island” bus stop so that alighting bus passengers in particular do not stray into the path of a moving cycle inadvertently. Stagecoach can assist the design team in this matter. There would be a strong case to incorporate a number of secure cycle stands at this stop, as the eventual development of Elms Park is likely to give rise to significant numbers of journeys seeking to use the bus services from true origins well within the	Yes	Space has been provided within the bus stop islands so that consideration of cycle stands can be made at the detailed design stage. At locations where pedestrians would alight the bus and would be required to cross a cycle track a zebra crossing has been included to allow pedestrians to cross the cycle path safely.	Space has been provided within the bus stop islands so that consideration of cycle stands can be made at the detailed design stage. At locations where pedestrians would alight the bus and would be required to cross a cycle track a zebra crossing has been included to allow pedestrians to cross the cycle path safely.

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			development, both before local buses can penetrate, but in the longer term to reach Tewkesbury and Ashchurch, which will not be served by routes penetrating the scheme.			
670	Stagecoach West	Traffic	In line with the design philosophy of the scheme, which appears to be purely traffic driven, the proposed signalised junctions here and further east are engineered to maximise their capacity for traffic, and typically feature two lanes for ahead movements, and filter lanes to both the left and right with significant stacking capacity. These seem to have been sized with little analysis of the likely demand for the movement: the 100m stacking length for the turn into Holdcroft Lane, a relatively small cul-de-sac, is an excellent example. The addition of a signalised crossroads junction within a very short distance of Gallagher Retail Park is already anticipated by that planning application, but these proposals create two highly engineered all-movements junctions, only about 120m apart. We actually wonder if, as part of the negotiations with	N/A	The comments are noted. The Applicant is liaising with the Local Planning Authorities and developers and will include feedback on the number of accesses for the Elms Park Development.	The comments are noted. The Applicant is liaising with the Local Planning Authorities and developers and will include feedback on the number of accesses for the Elms Park Development.

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			the Elms Park applicant, developer access B is actually necessary.			
671	Stagecoach West	Design	There is no sign of any attempt to incorporate of the very modest bus priority measures that were proposed by the Elms Park developers at these junctions.	Yes	We are working with the local planning authorities and the Elms Park developer on elements that the M5 J10 Improvements scheme can provide and those to be provided by others. This includes a review of bus provisions for opening year and options that would allow for future provision to coincide with the delivery phasing of the Development Sites.	The northern verge of the A4019 has been widened to allow for future bus lane provision from the fire station to Gallagher Junction. Right turn lane from A4019 westbound to North West Cheltenham (Elms Park) Allocated Site access changed to bus only.
672	Stagecoach West	Design	Between developer Access B and the Gallagher junction, the current Elms Park Planning application indicates a priority bus approach and left turn bypass to the Tewkesbury Road. The Housing Infrastructure Fund proposals remove this. In addition further downstream bus advantage is proposed towards Cheltenham. Again, there is no sign of this in the proposals. The failure to consider and incorporate bus priority measures is not in accordance with national and local policy and it is not something	Yes	We are working with the local planning authorities and the Elms Park developer on elements that the M5 J10 Improvements scheme can provide and those to be provided by others. This includes a review of bus provisions for opening year and options that would allow for future provision to coincide with the delivery phasing of the Development Sites.	The northern verge of the A4019 has been widened to allow for future bus lane provision from the fire station to Gallagher Junction. Right turn lane from A4019 westbound to North West Cheltenham (Elms Park) Allocated Site access changed to bus only.

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			<p>Stagecoach can accept. Without at the bare minimum, the level of bus priority anticipated by the developer scheme the Elms Park public transport strategy would in our evaluation, be seriously, and quite possibly fatally compromised. There is clear scope to incorporate bus priority in the space given over to the left turn lane for Gallagher, which would allow buses to bypass the lights as anticipated by the developer scheme, join the A4019 and then continue straight on through the Gallagher junction to the bus stop at Sainsburys, east of the junction. This would be effected by truncating the extent of the splitter island, and readjusting the lanes downstream of the junction by taking land from the generous central reservation. At that point they might, at least for now, have to merge into traffic. There is a separate potential adjustment that would take effect from 2031 that would ban right hand turns into Gallagher, and this would grant even more space to provide bus priority through this junction, in both directions.</p>			

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673	Stagecoach West	Active Travel	There is an important pair of existing stops at Sainsburys east of the Gallagher junction. While there are currently no controlled pedestrian crossing facilities – a major deficiency – these stops benefit from shelters and real-time information. They are also timing points on the passing services, meaning that, if buses are running early, they need to wait time here. Given this, the heavy concentration of employment and retail directly served by these stops, and a wider residential hinterland, it is essential that these stops are replaced with facilities of an appropriate standard, including controlled pedestrian crossing facilities that are well related to the stops.	No	Options to reinstate the bus stops at the eastern extent of the Scheme (i.e. near Sainsburys) are being considered. Discussions with Gloucestershire County Council and Stagecoach are ongoing to confirm proposals, which also need to consider the Elms Park planning application proposals.	Options to reinstate the bus stops at the eastern extent of the Scheme (i.e. near Sainsburys) are being considered. Discussions with Gloucestershire County Council and Stagecoach are ongoing to confirm proposals, which also need to consider the Elms Park planning application proposals.
674	Stagecoach West	Active Travel	The needs of Non-Motorised Users have apparently been placed at a rather higher level of consideration than public transport despite the location and nature of the Scheme. Stagecoach notes that a substantial investment in improving pedestrian and cycle facilities is made, that largely runs along the north side of the A4019 scheme. West of Uckington this	Yes	The government has a target of 50% of all local urban journeys being undertaken by walking and cycling by 2030. Due to the proposed developments the facilities for these users are intended to assist in the delivery of this target. The Scheme design has now been updated to provide segregated walking	The Scheme design has now been updated to provide segregated walking and cycling facilities alongside the A4019 through Uckington.

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			includes 2m pedestrian and “at least 3m” segregated cycle provision. However, this converges uncomfortably just west of the new Moat Lane bus stops to become a shared use 3m wide unsegregated facility, made rather more tricky still by the fact that the cycling provision to the west is to be two-way, which means that cycles in both directions will be sharing the space with pedestrians. The use by pedestrians of this facility will be very low indeed, and density of cycle traffic is also likely to be relatively low. This presents some quite difficult choices for designers, especially given the requirements of Local Transport Note 01/20, and the more recent DfT Guidelines “Inclusive Mobility” published in January 2022.		and cycling facilities alongside the A4019 through Uckington.	
675a	Stagecoach West	Active Travel	The design of the non-motorised users facilities needs some significant finesse, especially around the bus stops on the eastbound carriageway of the A4019, which, it should be recalled, have been rationalised significantly, to only two (plus a third at Sainsburys that needs upgrade). There is a much	Yes	The Scheme proposals now include segregated cycle and footway facilities along this section, in place of the previously proposed shared use path.	The Scheme proposals now include segregated cycle and footway facilities along this section, in place of the previously proposed shared use path.

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			stronger safety and business case for full cycle segregation to be provided east of Uckington, where pedestrian demands will be that much greater, rather than to the west. Within the design and associated scheme cost envelope, we therefore urge that the Non Motorised Users provision is better rebalanced east and west of Uckington to reflect this.			
675b	Stagecoach West	Active Travel	The approach to the Non Motorised Users provision between Cheltenham 1100 and Uckington (passing behind a proposed bus stop) seems especially irrational. From west to east, segregated 2-way cycle provision up to 4m wide (as it should be to meet Local Transport Note 01/20 standards) converges into a 3m shared use path behind the bus stop, despite no apparent space constraint. In so doing the provision lines up and “fires” cycles travelling at speed directly into a pedestrian waiting area. This is neither safe nor is it justified by space constraints. Rather, the segregated cycle facility can continue to pick up the	Yes	The Scheme proposals now include segregated cycle and footway facilities along this section, in place of the previously proposed shared use path. The proposed cycle path would generally follow the route of the previously proposed shared use path. The segregated footway is proposed between the service road and the property frontages, slightly to the north of the proposed cycle path. At the proposed eastbound bus stop, a mini zebra crossing of the cycle path is proposed for safe access between the bus boarding area and the footway.	The Scheme proposals now include segregated cycle and footway facilities along this section, in place of the previously proposed shared use path. The proposed cycle path would generally follow the route of the previously proposed shared use path. The segregated footway is proposed between the service road and the property frontages, slightly to the north of the proposed cycle path. At the proposed eastbound bus stop, a mini zebra crossing of the cycle path is proposed for safe access between the bus boarding area and the footway.

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			end of the farm accommodation road to reach the village.			
675c	Stagecoach West	Active Travel	Some thought will need to be given to the detail of how cycles cross The Green at a significant signalised junction. East of the Green the accommodation road arrangement could easily pick up the cycle provision, given the tiny number of vehicular movements. Cycles should be able to flow seamlessly to and from the eastern end of the road without any change of direction into segregated 4m wide cycle provision. This will need a well-considered design response. At this point the pedestrian footway should be adjusted to cross at 90 degrees north to south, would be much safer and more intuitively legible. The shared use ped-cycle facility should be provided as a conventional 2m wide footway as it is redundant and does not accord with Local Transport Note 01/20 nor "Inclusive Mobility".	Yes	The Scheme proposals now include segregated cycle and footway facilities along this section, in place of the previously proposed shared use path. The proposed cycle path would cross The Green with a signal-controlled cycle crossing, located between the proposed service roads and the A4019. The segregated footway is proposed between the service road and the property frontages, slightly to the north of the proposed cycle path. This footway would cross The Green just north of the service road junctions and due to its position away from the main junction and low forecast traffic flows, an uncontrolled pedestrian crossing is proposed. At the proposed eastbound bus stop, a mini zebra crossing of the cycle path is proposed for safe access between the bus boarding area and the footway.	The Scheme proposals now include segregated cycle and footway facilities along this section, in place of the previously proposed shared use path. The proposed cycle path would cross The Green with a signal-controlled cycle crossing, located between the proposed service roads and the A4019. The segregated footway is proposed between the service road and the property frontages, slightly to the north of the proposed cycle path. This footway would cross The Green just north of the service road junctions and due to its position away from the main junction and low forecast traffic flows, an uncontrolled pedestrian crossing is proposed. At the proposed eastbound bus stop, a mini zebra crossing of the cycle path is proposed for safe access between the bus boarding area and the footway.

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676	Stagecoach West	Active Travel	The number of pedestrian and cycle crossing points east of Uckington at all key junctions and nodes, which generally align with all the current and principal Non-Motorised Users desire lines, means that east of developer Access A it is likely to be more expedient, and provide a better level of service to all sustainable modes, to provide one-way 2m-wide “with flow” cycle provision. This could take advantage of the service/accommodation roads where necessary if space is at a particular premium. However, the width and geometry of some of the service and accommodation roads looks very generous, also incorporating dedicated parking facilities on the public highway. The balance within the design orthodoxy looks to be amenable to raising the status of cycles in particular, within the scheme, to provide seamless segregation without causing conflict with pedestrians, a large proportion of which in this context are likely to be bus passengers.	No	The majority of cycle movements are anticipated to be on the northern side of the A4019 and thus a two-way facility is being promoted. The suggestion was noted although the existing constraints along the corridor have prevented a number of options being developed.	The majority of cycle movements are anticipated to be on the northern side of the A4019 and thus a two-way facility is being promoted. The suggestion was noted although the existing constraints along the corridor have prevented a number of options being developed.
677	Stagecoach West	General	The operation of the Scheme and its effects on the wider network. These improvements cannot be	N/A	The Applicant is liaising with the Local Planning Authorities and developers to take into	

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			considered to sit in isolation. First, they are intended to address key links and movements not just to and from Cheltenham from the M5 at Junction 10, and Tewkesbury beyond, but a much wider and more complex range of movements on the western side of Cheltenham including the A40, M5 Junction 11 and the local road links between them, most important of those being Princess Elizabeth Way. Second, they facilitate both access to, and connectivity between some of the largest planned developments anywhere in the area, or the County.		consideration wider aspects that are not part of the scope of this Scheme.	
678	Stagecoach West	General	Of these, it is not apparently known, if a new north-south spine road for all traffic will be provided through Joint Core Strategy Allocation A7 Golden Valley/Hayden. Tewkesbury Borough and Cheltenham Borough Councils progressed a Supplementary Planning Document for the allocation A7, ("West Cheltenham 'Cyber Central Garden Community' SPD";) including the land to the west excised from the Green Belt that does not yet benefit from the	N/A	A north-south spine road is to be provided but the Applicant have not yet received confirmation if this is a through road for all traffic or will contain a bus gateway mid-way through. The islands have been designed large enough to allow them to be modified in the future, should bus gates be required.	

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			allocation. Tewksbury Borough Council did adopt this on 28th July 2020, and we understand that Cheltenham Borough Council did also. It thus forms a part of the statutory adopted development plan for the A7 allocation and adjoining safeguarded area within Tewksbury Borough Council.			
679	Stagecoach West	General	The approach to access and circulation has a fundamental bearing on the way in which the West Cheltenham Link Road element of the Housing Infrastructure Fund Scheme would be used, and how far any relief would be provided to existing traffic making local trips on the western flank of the town.	N/A	Traffic modelling has been undertaken to determine the appropriate provision needed. This will be made available in the Transport Assessment Report as part of the Development Consent Order application. However, it is for developers and the Local Planning Authorities to come forward with proposals within the development sites and how they propose to use the infrastructure that the Scheme is providing.	
680	Stagecoach West	General	Stagecoach very well recognises the exceptional tension in the Joint Core Strategy Supplementary Planning Document on access and movement and many of the other place-making principles that both	N/A	It is for developers and the Local Planning Authorities to come forward with proposals within the development sites and how they propose to use the infrastructure that the M5 Junction 10 Improvements Scheme is providing.	

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			the Councils initially wished to pursue.			
681	Stagecoach West	Traffic	The principle established in the access and movement Framework Plan was that “Subject to traffic modelling, the management of the main street through the site should give priority to bus and cycle movements to help prevent the route being used as a rat run.” This indicated, rather controversially, that the whole development would be accessed by general traffic only from its edges, and that the primary street would be likely to entirely prohibit through vehicular movements, except by public transport.	N/A	A north-south spine road is to be provided but the Applicant has not yet received confirmation if this is a through road for all traffic or will contain a bus gateway mid-way through. The islands have been designed large enough to allow them to be modified in the future, should bus gates be required.	
682a	Stagecoach West	Traffic	Given the existing pressures on the local network as well as the scale of the proposals, this has momentous implications for how the local highways network operates, and in particular Princess Elizabeth Way, as well as a number of other streets within Springbank and Hester’s Way, all of which currently accommodate regular bus services.	N/A	Traffic modelling has been undertaken and included in the Transport Assessment which forms part of the Development Consent Order application. Whilst the microsimulation corridor model developed in Paramics software which is used in the Transport Assessment only models Princess Elizabeth Way as an approach to Kingsditch Roundabout, the	

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					strategic model developed in SATURN software simulates Princess Elizabeth Way in its entirety.	
682b	Stagecoach West	Traffic	It also obviously has significant implications for the role of the M5 between Junction 10 and Junction 11 in facilitating some of the local journey demands likely to arise. that compared with car use. Any such new service would, it should be stressed, use the new Junction 10 and the proposed Housing Infrastructure Fund Scheme links. However it is not clear how far which, if any, of the principles Cheltenham Borough Council as both landowner, promoter and Local Planning Authority is committed to pursuing, including this fundamental matter. As currently planned this might well be expected to function as little more than a development access road for the northern (mainly residential) portion of Golden Valley.	N/A	It is for developers and the Local Planning Authorities to come forward with proposals within the Development Sites and how they propose to use the infrastructure that the Scheme is providing.	
683	Stagecoach West	Traffic	The Tewkesbury Road corridor continues in towards the centre of Cheltenham, and while it is a dual 2x2 carriageway for much of that length, at the B4633 Gloucester	N/A	The comment is noted, however the feedback provided is with regards to unlocking development identified in the Joint Core	

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			<p>Road junction it suddenly reduces to a 2-lane road underneath the former Midland Railway overbridge. It is typically extremely congested, also being affected by numerous side road junctions. No proposals have been made since the 1970s to increase the capacity of this link or deal with the constrictions at its eastern end. The position of Gloucestershire County Council appears to be that the status quo is optimal, in that it presents no formal restrictions on private car use, and minimal limitations on traffic movements at junctions, and in effect operates by rationing. The introduction of a very large amount of additional demand onto the corridor, further boosted by increased by greatly improved highways capacity provided by the consultation proposals, suggests that congestion and delay at all points east of the junction would be likely to materially worsen. For this reason the implementation of the facility at Uckington to perform a consolidation function onto public transport ("Park and Ride") or otherwise facilitate mode change, for example to or from cycling is</p>		<p>Strategy, which is outside of the scope of the M5 Junction 10 Improvements Scheme.</p>	

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			material to the operation of the whole route. This facility has consistently featured in Gloucestershire County Council transport policy set out in the Local Transport Plan, for many years, though both the nature of the scheme, its scale, and Gloucestershire County Council's appetite to progress it, have apparently been somewhat variable. The view is that the Uckington site is highly suitable to perform this role. What has been lacking is any commitment to provide an attractive public transport offer beyond it, either into the town centre, or conceivably towards GCHQ, via the provision of seamless bus priority on the Tewkesbury Road corridor. Without this, it is almost inconceivable that it would have any relevance to the public.			
684	Stagecoach West	Traffic	Stagecoach is at least as concerned about Princess Elizabeth Way, and wider peak traffic conditions across this part of Cheltenham. This by any reasonable interpretation, must be considered to be severe, and is reflected not only in long delays, but elaborate "rat-running"	N/A	The comment is noted. It is for the developers and Local Planning Authorities to come forward with proposals within the Development Sites and how they propose to use the infrastructure that the Scheme is providing.	

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			strategies. As part of our input into the proposals for Allocation A7 of the Joint Core Strategy we have long maintained that taking advantage of the plentiful carriageway and wider public highway on Princess Elizabeth Way to provide seamless segregation for frequent bus services along its length, ought to be among the highest priorities in any strategy.			
685	Stagecoach West	Traffic	Stagecoach has a very profound interest in the results of modelling exercises that have been recently undertaken that take in the network in this area. Such modelling is necessary to act as crucial evidence for the ongoing review of the Joint Core Strategy, including the addition of 2,200 possible additional homes at Golden Valley within Tewkesbury Borough (making 3700 in total); and further development west of Elms Park, which could include employment and possibly further residential uses. As well as an up-to-date Strategic Traffic Model, we are aware that micro-simulation models have been constructed by the Elms Park promoter focused on the scheme	N/A	Details of the traffic modelling were included in the Staged Overview of Assessment Report, which was published as part of the Preferred Route Announcement. The traffic model has been updated and refined as the preliminary design developed and will be presented in the Transport Assessment Report as part of the Development Consent Order application.	

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			location, and quite possibly by National Highways and the Applicant in support of these specific proposals. While it would be inappropriate to speculate greatly, we consider that it is likely that levels of delay and congestion across the west of Cheltenham will barely change as a result of the Housing Infrastructure Fund proposals, and may, taken collectively with committed development in the area, actually only assist in aggravating it.			
686	Stagecoach West	Traffic	The proposals must actively seek to improve the relative attractiveness, relevance and effectiveness of bus services in meeting both existing and future travel requirements, not just within the immediate proximity of the improvements, but over a much broader area extending from the A40 as far as Tewkesbury and Ashchurch.	N/A	The Applicant continues to have further discussions and work with the stakeholder throughout the development of the Scheme. Gloucestershire County Council's Bus Service Improvement Plan sets out to improve connectivity to the wider network through joint working with the Local Planning Authorities and bus operators.	
687	Stagecoach West	General	We would respectfully urge that the Applicant and National Highways, engage in urgent dialogue alongside the scheme designers to ensure that the	N/A	The Applicant is working with National Highways and Gloucestershire County Council on Statements of Common Ground. The	

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			design of the scheme is able to meet the requirements of national policy and support the implementation of Gloucestershire County Council's own recently adopted Local Transport Plan, in advance of the presentation of final proposals.		Applicant will continue to have discussions throughout the development of the Scheme.	
688	Stagecoach West	General	We have already signalled our willingness to work collaboratively and at pace, to explore each of the matters we highlight with the designers. If necessary, this should include the Elms Park applicant.	N/A	The Applicant is working with the stakeholder on a Statement of Common Ground. The Applicant will continue to have discussions throughout the development of the Scheme.	
689	Stagecoach West	General	It is recognised that the funding set aside for the project has very clear date by which the scheme must be implemented. This may well explain why the proposals are as they are. It is crucial that in seeking to progress the project with haste, that the final proposals consented do not lead to very serious longer-term consequences for the environment, economy, and society.	N/A	Comment is noted.	
690	Stagecoach West	General	Given national policy is so clear, and given the imperative to support buses providing for a much high proportion of	N/A	The need for modal shift in transport provision is recognised. The Scheme includes high quality active	

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			<p>movements between Tewkesbury and Cheltenham, and for local journeys on the western flank of Cheltenham alike, it is inadmissible for the Scheme to fail to even evaluate the case to incorporate bus priority measures in a transparent and rigorous manner. This is far from being a simplistic call for bus lanes to be incorporated indiscriminately throughout the scheme. It is expected that a clear process followed, looking at both the existing and the potential evolution of bus services through and impinging on the Scheme, particularly at the Cheltenham end. This should be set against the movement demands the scheme accommodates.</p>		<p>travel facilities. The Applicant is continuing to examine bus provisions, including options that would allow for future provision to coincide with the delivery phasing of the Development Sites. The Applicant is working with the local planning authorities on elements that the Scheme can provide and those outside the scope of the Scheme, which therefore need to be provided by others. Further detail will be provided as part of the Development Consent Order Submission.</p>	
691	Stagecoach West	Traffic	<p>Where modelling shows the potential to significantly advantage bus on given junction arms, the mechanism to achieve this should be evaluated. This may or may not require or justify segregation. This process should have regard for the way the number of bus movements and seats per hour through the scheme would increase. It would be appropriate to look at a range</p>	N/A	<p>As part of the Scheme development bus provision has been reviewed and included in the latest proposals as part of the Development Consent Order submission. However, the Scheme has limited control over potential future bus provisions, which sits with developers and the Local Planning Authorities.</p>	

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			of scenarios for mode shift towards bus, and how such measures could be expected to “level up” the convenience of bus against personal car use to achieve them.			
692	Stagecoach West	Design	It will be necessary to ensure that suitable, convenient, and safe bus stop facilities are provided, at the eastern end of the project, and alongside those, associated street furniture, passenger information, lighting, and pedestrian and cycle crossing facilities. Given the extent of the hinterland to such stops, especially within Elms Park, we would expect secure cycle provision to be provided.	No	The Scheme is providing a bus layby and space allowed for shelter and other street furniture. This will be developed as part of detail design.	The Scheme is providing a bus layby and space allowed for shelter and other street furniture. This will be developed as part of detail design.
693	Stagecoach West	Design	The Scheme needs to demonstrate how it will facilitate the successful integration of the Multi-Modal Interchange at Uckington.	Yes	A Park and Ride is currently included in the Elms Park planning application and therefore is outside the scope of this scheme. However, the entrance to this Park and Ride facility has been included on the latest design to match the developer's design.	A Park and Ride is currently included in the Elms Park planning application and therefore is outside the scope of this scheme. However, the entrance to this Park and Ride facility has been included on the latest design to match the developer's design.
694	Stagecoach West	General	We are keen to work to the objective to producing a Statement of Common Ground with the Applicant.	N/A	The Applicant is working with the stakeholder on a Statement of Common Ground. The Applicant will continue to have discussions	

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
					throughout the development of the Scheme.	

M.4. Prescribed Consultees (Statutory Undertakers)

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
703	Severn Trent Water	Consultation	We have not received the draft provisions for the protection of water and sewerage undertakers we expect to be contained within the submission of the Development Consent Order application. We would welcome a discussion on the proposed protective provisions enclosed with this document, which incorporates appropriate provisions to ensure that the delivery of its statutory functions and essential public services are not put at risk. Pending the agreement of such provisions, we wish to register its objection to any proposed compulsory acquisition which might affect our assets or access thereto, so as to safeguard the ongoing delivery of these essential public services.	N/A	The draft protected provisions will form part of the Development Consent Order application and the Applicant will continue to engage with the stakeholder on this.	

M.5. People with Interest in Land (PwIL)

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
549	PwIL 1	Environment	That a full land drainage survey and soils report is carried out prior to commencement of the works on the land to be used for the construction compound/works and that follow up surveys post scheme to be carried out to ensure that there is no damage to the land drainage, compaction on contamination of the land and soils on return of the additional land required as part of the works. Full indemnity to be provided to rectify a damage caused to the land being used as part of the scheme on return after the scheme is completed.	N/A	In our proposed design the continuity of land drainage is maintained by the introduction of ditches and filter drains at the new toes and top of cutting slopes. Connectivity of existing land drainage found during construction will be maintained. We will continue our liaison with landowners throughout the design development prior to the submission of the Development Consent Order application.	
563	DFS Group PLC	Traffic	In our experience, where initiatives such as this have occurred in proximity to our stores, the disruption has been quite significant. The main cause of this is extensive and often complicated diversion	N/A	This comment is noted. The Applicant will continue to engage with stakeholders including businesses as the Scheme progresses to ensure the local community	

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			<p>routes that are poorly signposted and so ultimately cause customers to avoid the area and choose alternative routes. This clearly impacts on our trade. If the proposed works are to progress, we strongly urge you to take this into consideration when planning and implementing any necessary diversions. With careful consideration and consultation, we believe that the diversions can be effectively implemented without causing widespread disruption to those people travelling through and trading in the area.</p>		<p>is kept up to date of the latest plans.</p>	
582	PwIL 1	Design	<p>If subsequently this block of land is only left with one access, then my clients would reconsider our position and object to the current proposal on the basis of any change to the accesses shown. Proposed Replacement Accesses Pigeon House Farm. Which as recently as the</p>	Yes	<p>A second field access has been included from the A4019 approximately opposite Cooks Lane.</p>	<p>A second field access has been included from the A4019 approximately opposite Cooks Lane.</p>

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			last couple of weeks we have been asked to identify our preferred access point which leads us to consider that there could be an intention to only provide one of the options. Please can you confirm that both access points will be provided as part of the Scheme?			
583	PwIL 1	General	My clients support the overall proposal, but do have substantial and grave concerns with regards to the designs in the current draft proposal and these points have been raised previously. Agriculturally related-there are serious farm traffic safety concerns as to the current proposals for alterations to access on to the A4019 where it passes their land and their secondary access point to the East. Their land comprises a block of arable ground which borders the road. The current primary access as traffic has increased over the years is already a challenging	N/A	Under the Scheme, the northern arm will be for field access opposite the Link Road Junction and future proofing the highway layout for provision of future main access junction for Safeguarded Site development. This is due to the Status of land (Safeguarded Site), which is only 'safeguarded' for future development. The Applicant has assessed a layout in the traffic modelling to ensure that a junction with sufficient capacity is feasible at this location and the proposals of the Scheme will not restrict any such provisions in future. It is the responsibility of the developer to develop the	

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			<p>junction to slow down for, turn in to and to pull out of with large farm machinery, including combine harvesters, tractors with fully laden grain trailers, straw balers and straw lorries, as well as the usual tractors, seed drills, fertiliser trailers and regular sprayer visits through the farming calendar. During harvest for safety reasons the second main agricultural access is used for both the combine harvesters and most importantly tractors full with grain as the tractors and empty grain trailers return via entrance 1 in a one way system to prevent large agricultural vehicles having to wait on the A4019 which could potentially cause an accident. At present vehicles exiting the land turn right across the carriageway. The proposed changes have the following impacts: Remove four accesses points, to be replaced by a single one over land in separate</p>		<p>Safeguarded Site access and obtain required planning permission as part of the wider Safeguarded Site planning application. For secondary access the Central reserve between Link Road Junction and Uckington Junction has been widened to accommodate potential for future junction and right turn lane.</p>	

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			<p>ownership, meaning that if there is an accident on the main road around that point there will be no availability of an alternative exit and entry point, which can cause the potential for a notable impact on the business during peak periods especially when weather changes mean operations need to be completed urgently. We have recently been provided with an interim solution to the access that differs from that on attached plan which is even less practical as it is a narrow track with several bends on it, whereas the current four access points are directly off the A4019 and straight. It will not be suitable for the size of vehicles. Furthermore the new access would be shared with three other landowners who may well all be looking to carry out similar agricultural works at the same time e.g. during harvest and the volume of traffic during these time</p>			

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			(which are weather dependent) will cause chaos on the adjoining road network and is likely to be extremely dangerous to all road users due to the poor design.			
584	PwIL 1	Design	There does not appear to be any proposed traffic lighting for the temporary access thus the multiple users of the access could have to halt on the A road to wait for a vehicle to exit on to the road; they will not be able to safely reverse along such a curved track. My clients traffic flows from the land always turn right/West from the site, hence crossing the carriage way. There seems a high likelihood of accidents if this has to be done with other high sided and large vehicles waiting on the A4019 to turn in to the land, as they will limit visibility for all road users.	Yes	It is proposed that any temporary solution would be under signal control.	It is proposed that any temporary solution would be under signal control.
585	PwIL 1	Design	This interim solution is totally unacceptable and even the current proposal	Yes	Under the Scheme, the northern arm will be for field access opposite the Link	Under the Scheme, the northern arm will be for field access opposite the Link Road Junction and future proofing the

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			<p>needs to be redesigned to be suitable for agricultural traffic but at least with some modification it could be practical for future use. We have discussed the issue of the land not having a secondary access again having previously raised this other representations to the design team and parties involved as effectively the land has been reduced from 4 access points to only 1 access. At the meeting we were advised that drawings were being developed for a second access into the land somewhere to the east of the current access. We had expected to see a design for the secondary access which allows access across the carriageway to turn West which would be somewhere in the region of the point as marked on the plan. This is also integral to our support for the proposal and needs to be included on the adopted scheme layout plans if we</p>		<p>Road Junction and future proofing the highway layout for provision of future main access junction for Safeguarded Site development. This is due to the Status of land (Safeguarded Site), which is only 'safeguarded' for future development. The Applicant has assessed a layout in the traffic modelling to ensure that a junction with sufficient capacity is feasible at this location and the proposals of the Scheme will not restrict any such provisions in future. It is the responsibility of the developer to develop the Safeguarded Site access and obtain required planning permission as part of the wider Safeguarded Site planning application. For secondary access the Central reserve between Link Road Junction and Uckington Junction has been widened to accommodate potential for future junction and right turn lane.</p>	<p>highway layout for provision of future main access junction for Safeguarded Site development. This is due to the Status of land (Safeguarded Site), which is only 'safeguarded' for future development. The Applicant has assessed a layout in the traffic modelling to ensure that a junction with sufficient capacity is feasible at this location and the proposals of the Scheme will not restrict any such provisions in future. It is the responsibility of the developer to develop the Safeguarded Site access and obtain required planning permission as part of the wider Safeguarded Site planning application. For secondary access the Central reserve between Link Road Junction and Uckington Junction has been widened to accommodate potential for future junction and right turn lane.</p>

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			<p>are going to support the proposal as it is a safety consideration for the use of land agriculturally and also this parcel of land would be reduced to no accesses on the road frontage to the A4019 whereas it currently has 4 and it is not unreasonable to request at least one when we could object on the basis the scheme must replace all of the existing road side accesses as they are now. The proposals are required to be altered to include: The new access is built to an adoptable standard with two lanes in and two lanes out with traffic (exit triggered) lights, as previously promised and as shown in the Consultation document on which these representations are based with the current proposed access track off this junction widened significantly to be safe for agricultural use (probably twice the width as currently shown). This main access is straight, built as per the</p>			

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			<p>main scheme design otherwise they are suffering a major degradation in the safety, quality and usefulness of the proposed access point on the western edge of my clients land. The access track is adopted as public highway, or my clients are transferred ownership of the access track following completion of the scheme to prevent any future ransom by the owner of the adjoining land. A replacement secondary access further East is provided and maintained as an alternative emergency route in case the main access is blocked by an accident as previously advised. Further detailed information is provided with regards to the flood risk and drainage modelling as this could impact detrimentally on to the subject land. Progression with either a Development Consent Order or the use of compulsory powers should</p>			

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			not be progressed until the matter of safe and no lesser standard of accesses are satisfactorily resolved			
700	Aldi Stores Limited	Traffic	Stage 1 consists of an increase in the size of the Gallagher Retail Park junction to provide additional capacity, and improve pedestrian and cycle connectivity/facilities. Further clarity needs to be provided on the precise land-take and construction programme for the works, in order to understand whether there are any implications for the site and the operation/accessibility of the store.	Yes	This has been designed out and therefore land take is no longer required.	This has been designed out and therefore land take is no longer required.
713	PwL 2	Design	The removal of two accesses points, to be replaced by a single one over land the landowner does not own, meaning that if there is an accident on the main road around that point there will be no availability of an alternative exit and entry point, which can cause the potential for	Yes	A second field access has been included from the A4019 approximately opposite Cooks Lane.	A second field access has been included from the A4019 approximately opposite Cooks Lane.

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			a notable impact on the business during peak periods, especially when weather changes mean operations need to be completed urgently.			
714	PwIL 2	Design	The single access is informally proposed to be initially an interim solution of a narrow track with several bends on it, whereas the current two access routes are both straight. The new access would be shared with three other land owners who may well all be looking to carry out similar high peak volume works at the same time e.g. during harvest. In addition to this the contractor for the M5 Junction 10 works will also be using this area, given the proposed compound location. At meetings the Applicant has confirmed a four lane junction will be created, albeit on a shorter length basis.	Yes	To provide safe access and also left and right turning options, the Scheme has combined a number of field accesses on the northern side of the A4019 to provide a single shared field access from A4019 Link Road Junction (northern arm). The single access is being designed for anticipated agricultural usage.	To provide safe access and also left and right turning options, the Scheme has combined a number of field accesses on the northern side of the A4019 to provide a single shared field access from A4019 Link Road Junction (northern arm). The single access is being designed for anticipated agricultural usage.
715	PwIL 2	Design	The new access for the third party land by the M5	No	To provide safe access and also left and right turning	To provide safe access and also left and right turning options, the Scheme has

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			would also pass along the frontage of the landowners' land and expose them to the substantial risk and costs of the illegal users of one of the nearby fields causing similar problems, as well as fly tipping, on to their land.		options, the Scheme has combined a number of field accesses on the northern side of the A4019 to provide a single shared field access from A4019 Link Road Junction (northern arm). The Scheme is proposing to provide fences on either side of the access track and will work with the landowner on any further security measures that may be required.	combined a number of field accesses on the northern side of the A4019 to provide a single shared field access from A4019 Link Road Junction (northern arm). The Scheme is proposing to provide fences on either side of the access track and will work with the landowner on any further security measures that may be required.
716	PwIL 2	Design	The splays as shown for the temporary access do not look sufficient for longer vehicles which include combine harvesters and articulated lorries collecting either crops or straw from the land.	N/A	The design work has considered long vehicles. The Applicant will provide details as they continue discussions with the landowner.	The design work has considered long vehicles. The Applicant will provide details as they continue discussions with the landowner.
717	PwIL 2	Design	There does not appear to be any proposed traffic lighting for the temporary access thus the multiple users of the access could have to halt on the A road to wait for a vehicle to exit on to the road; they will not be able to safely reverse along such a curved track.	Yes	It is proposed that any temporary solution would be under signal control.	It is proposed that any temporary solution would be under signal control.

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			The landowners traffic flows from the land always turn right/west from the site, hence crossing the carriage way. There seems a high likelihood of accidents if this has to be done with other high sided vehicles waiting on the A4019 to turn in to the land, as they will limit visibility for all road users.			
718	PwIL 2	Design	The new access needs to be built to an adoptable standard with two lanes in and two lanes out with traffic (exit triggered) lights, as previously promised and as shown in the consultation document.	No	To provide safe access and also left and right turning options, the Scheme has combined a number of field accesses on the northern side of the A4019 to provide a single shared field access from A4019 Link Road Junction (northern arm). As the land to the north is only "safeguarded" for development, it is not considered appropriate to provide a full development access, but the Scheme has taken this into account in the design of the A4019 Link Road Junction. It is for the developers to put their access proposals as part of their planning applications.	To provide safe access and also left and right turning options, the Scheme has combined a number of field accesses on the northern side of the A4019 to provide a single shared field access from A4019 Link Road Junction (northern arm). As the land to the north is only "safeguarded" for development, it is not considered appropriate to provide a full development access, but the Scheme has taken this into account in the design of the A4019 Link Road Junction. It is for the developers to put their access proposals as part of their planning applications.

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719	PwIL 2	Design	The proposals should be updated to ensure this access is straight, built as per the main scheme design shown in the consultation and extends/is adopted all the way up to their land, otherwise the landowners are suffering a major degradation in the safety, quality and accessibility of their remaining land.	No	To provide safe access and also left and right turning options, the Scheme has combined a number of field accesses on the northern side of the A4019 to provide a single shared field access from A4019 Link Road Junction (northern arm). As the land to the north is only "safeguarded" for development, it is not considered appropriate to provide a full development access, but the Scheme has taken this into account in the design of the A4019 Link Road Junction. It is for the developers to put their access proposals as part of their planning applications.	To provide safe access and also left and right turning options, the Scheme has combined a number of field accesses on the northern side of the A4019 to provide a single shared field access from A4019 Link Road Junction (northern arm). As the land to the north is only "safeguarded" for development, it is not considered appropriate to provide a full development access, but the Scheme has taken this into account in the design of the A4019 Link Road Junction. It is for the developers to put their access proposals as part of their planning applications.
720	PwIL 2	Design	A replacement secondary access further east should be provided and maintained as an alternative emergency route in case the main access is blocked by an accident.	Yes	A second field access has been included from the A4019 approximately opposite Cooks Lane.	A second field access has been included from the A4019 approximately opposite Cooks Lane.
721	PwIL 2	Design	The third party fields to the west between the identified land and the M5 should be	No	The Scheme is not looking to provide an access from the north, plans are to replace	The Scheme is not looking to provide an access from the north, plans are to replace the existing access as close to

Ref	Consultee	Topic	Matter raised	Scheme change	Response	Change or no change to scheme
			provided with their own new accesses from the north, across land owned by the town council. This removes a security risk to the land and reduces the number of agricultural users that would need to utilise the new access on to the busy A4019. Sharing this access with a second party is much more dangerous than at present; sharing between four agricultural users is seen as unwise at best and likely to cause accidents at worst, given the increase in traffic volumes above the current high levels.		the existing access as close to the current position as possible. The Applicant will continue to work with you to understand what additional safety provisions can be put in place.	the current position as possible. The Applicant will continue to work with you to understand what additional safety provisions can be put in place.
722	PwIL 2	Environment	Further detailed information is required with regards to the flood risk and drainage modelling as this could impact detrimentally on to the subject land	N/A	Further details are provided in the Environmental Statement. The Environmental Statement is informed by extensive hydraulic modelling, the details of which have been reviewed by the Environment Agency. Significant effort has been input to the evaluation of flood risk and demonstrating measures to remove any adverse impacts.	

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723	PwIL 2	Design	Until the lesser standard of accesses are satisfactorily resolved there should be no progression with either a Development Consent Order or the use of compulsory powers should not be progressed.	N/A	The Applicant will continue to liaise with the stakeholder to develop and agree a solution.	The Applicant will continue to liaise with the stakeholder to develop and agree a solution.

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