

M5 Junction 10 Improvements Scheme

Statement of Common Ground
Safeguarded Land Adjacent to Junction 10
TR010063 - APP 8.8

Regulation 5(2)(q)

Planning Act 2008

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

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

8.8 Statement of Common Ground Safeguarded Land Adjacent to Junction 10

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Planning Inspectorate Scheme Reference	TR010063
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Author:	M5 Junction 10 Improvements Scheme Project Team

Version	Date	Status of Version
Rev 0	December 2023	DCO Application

STATEMENT OF COMMON GROUND

This Statement of Common Ground has been prepared agreed by (1) Gloucestershire County Council and (2) Bloor Homes

Signed

On behalf of Gloucestershire County Council

Date:

Signed

On behalf of the Bloor Homes Ltd.

Date:

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Glossary

Term	Meaning / Definition
(The) Act	The Planning Act 2008 (as amended)
(The) Applicant	Gloucestershire County Council (Strategic Development team) applying for a Development Consent Order (DCO)
Biodiversity Net Gain (BNG)	Biodiversity Net Gain delivers measurable improvements for Biodiversity by creating or enhancing habitats in association with development
Carter Jonas (CJ)	Land referencing consultant working on behalf of the Applicant
Cheltenham Borough Council (CBC)	CBC is the local planning authority for Cheltenham Borough, and is a statutory consultee for the scheme, as defined under section 42(1)(b) and section 43(b) of the Act
Development Consent Order (DCO)	The consent for the construction, operation and maintenance of Nationally Significant Infrastructure Projects (NSIP) given by the relevant Secretary of State on the recommendation of the Planning Inspectorate under the Planning Act 2008 (as amended).
Environment Agency (EA)	A non-departmental public body with responsibilities relating to the protection and enhancement of the environment in England.
Environmental Impact Assessment (EIA)	A process of evaluating the likely environmental impacts of a proposed development, including inter-related socioeconomic, cultural and human health impacts, both beneficial and adverse.
Environmental Statement (ES)	Reports the findings of the EIA, including at least the information reasonably required to assess the likely significant environmental effects of the development.
Examining Authority (ExA)	The person(s) appointed by the Secretary of State (SoS) to assess the DCO application and make a recommendation to the SoS.
Flood Risk Assessment (FRA)	An assessment of the likelihood of flooding in a particular area so that development needs, and mitigation measures can be considered.
Gloucestershire County Council (GCC)	Gloucestershire County Council. It is therefore a statutory consultee for the Scheme, as defined under section 42(1)(b) and section 43(c) of the Planning Act 2008 ("the Act"). GCC is the local highway authority in Gloucestershire and is the Minerals and Waste Planning Authority (MWPA) for Gloucestershire. GCC also has statutory duties in relation to drainage, flood risk, and heritage assets and archaeology.
Historic England	Publicly funded body that champions and protects England's historic places, also known as the Historic Buildings and Monuments Commission for England.
Host Authority	The local authority, within which the Scheme would be situated, In this case, Cheltenham Borough Council, Gloucestershire County Council and Tewkesbury Borough Council.
Local Planning Authority (LPA)	The county council, metropolitan, or district council, which has statutory responsibilities within its administrative areas.

Term	Meaning / Definition
Nationally Significant Infrastructure Project (NSIP)	A project of a type and scale defined under the Planning Act 2008 and by Order of the Secretary of State (SoS) relating to energy, transport, water, wastewater and waste generally. These projects require a single development consent, which includes consents under different regimes, such as planning permission, listed building consent and scheduled monument consent.
Natural England (NE)	Executive non-departmental public body responsible for the natural environment.
Planning Inspectorate (PINS)	The Government Agency responsible for operating the planning process for NSIPs. The Planning Inspectorate is responsible for examining DCO applications and making recommendations to the relevant SoS, who will make the decision on whether to grant or to refuse development consent. The SoS for Transport takes the decision on applications for highway NSIPs.
Preferred Route Announcement (PRA)	Designation of a proposed option as a 'preferred route' by the Department for Transport, announced in June 2021, and provides a form of planning protection from development of land in the vicinity of the M5 Junction 10 Improvements Scheme
Statement of Community Consultation (SoCC)	Prepared in accordance with Section 47 of the Planning Act 2008, to inform, explain and communicate how the consultation will be undertaken.
Statutory Consultation	In accordance with the Planning Act 2008, applicants of major infrastructure projects have a statutory duty to carry out a consultation on their proposals before submitting an application to the Planning Inspector.
(the) Scheme	The proposed M5 Junction 10 Improvements development which is the subject of a DCO application.
Tewkesbury Borough Council (TBC)	Tewkesbury Borough Council is the local planning authority for Tewkesbury Borough and a statutory consultee for the Scheme, as defined under section 42(1)(b) and section 43(b) of the Act.
Water Framework directive	The Water Framework Directive (2000/60/EC) which established a framework for European Community action in the field of water policy.

1. Introduction

- 1.1.1. This Statement of Common Ground (SoCG) has been prepared in respect of the application for the M5 Junction 10 Improvements Scheme (“the Scheme”) made by Gloucestershire County Council (GCC) (the Applicant) to the Secretary of State for a Development Consent Order (DCO) under section 37 of the Planning Act 2008.
- 1.1.2. If made, the DCO would grant consent for the construction of improvement works to M5 Junction 10, consisting of a new all-movements junction; the widening of the A4019 east of the junction to the Gallagher Retail Park Junction; and a new link road from the A4019 to the B4634. A small section of the A4019 will also be widened to the west of the proposed junction.

1.2. Purpose of the report

- 1.2.1. This document is a SoCG between GCC (the Applicant) and Bloor Homes (the developers with an interest in Safeguarded Land adjacent to Junction 10) in relation to the M5 J10 Improvements Scheme.
- 1.2.2. The document identifies the following between the parties:
- Matters which have been agreed; and
 - Matters currently outstanding (subject to negotiation or not agreed)
- 1.2.3. The matters which are referenced in this document are considered to be of material difference. Other lesser matters, such as those that concern amendments to supporting documents, will be reported on in the Consultation Report or addressed in the Environmental Statement (ES), submitted as part of the DCO application.
- 1.2.4. The SoCG will continue to evolve as the application for development consent progresses through the pre-application and Examination stages.

1.3. Structure of Statements of Common Ground

- 1.3.1. The SoCG has been structured in a consistent form and sets out the matters which are agreed, the matters subject to further discussion and those matters which are not agreed. A SoCG will be tailored according to the approach agreed with the interested party concerned.
- 1.3.2. This SoCG has the following structure
- Section 1: Introduces the SoCG and provides a description of its purpose.
 - Section 2: outlines the engagement that has taken place between the interested party.
 - Section 3: sets out any issues that have arisen, reporting on the status of each issue, i.e., whether it is agreed, still under discussion or not agreed, and any remaining actions.
- 1.3.3. Where relevant, documents that are referenced in the SoCG but do not form part of the application are available to the Examining Authority (ExA) upon request.

1.4. Status of this SoCG

- 1.4.1. This SoCG is a correct reflection of the position of both parties at the pre-application stage.
- 1.4.2. It is acknowledged that the views and opinions of both parties may change over time and as such this SoCG will continue to evolve as the application for development consent progresses through the examination stage.

2. Consultation

2.1. The Role of Gloucestershire County Council

2.1.1. In this SOCG, GCC is the Applicant for the M5 Junction 10 Improvements Scheme, and this is separate and independent from the other functions and statutory duties carried out by the Council. As Applicant, GCC are promoting and delivering the Scheme and will consult the rest of the Council, other Local Planning Authorities, National Highways and Homes England. These discussions and consultation are to be recorded in separate SOCGs with the other parties.

2.2. The Role of Bloor Homes

2.2.1. Bloor Homes hold land purchase options and are property developers. Their role in relation to the DCO process derives from their joint venture in the development of a safeguarded site adjacent to Junction 10 identified in the adopted Joint Core Strategy.

2.2.2. The Scheme will support the development of the safeguarded land adjacent to Junction 10.

2.3. Summary of Consultation

2.3.1. GCC has been in consultation with Bloor Homes during the development of the Scheme's design, including the optioneering process. The parties have continued communicating throughout the progression of the Scheme.

2.3.2. The engagement outlined in Table 2-1 covers formal consultation with Bloor and engagement which pertains to matters raised in this SoCG. Other exchanges, such as requests for information or clarification points are not detailed below but are available on request.

2.3.1. The consultation with Bloor Homes since 16 June 2021, the date of the Proposed Route Announcement, is set in Table 2-1.

Table 2-1 - Consultation with Bloor Homes for Safeguard Land Adjacent to Junction 10

Date	Method	Parties concerned	Matters discussed
06/12/2021	Post/ Email	Bloor Homes	USB sent to Bloor address along with formal notification on the start of the Statutory Consultation.
15/02/2022	Email	Bloor Homes / Persimmon Homes	Formal consultation response received from Bloor Homes/ Persimmon Homes
15/02/2022	Email	Bloor Homes / Persimmon Homes	Minor amendment to Bloor Homes representation.
12/05/2022	Email	Bloor Homes	Response provided for feedback on Statutory consultation.
18/07/2022	Email	Bloor Homes	Placeholder sent by Atkins project manager for a meeting to discuss Site A.

Date	Method	Parties concerned	Matters discussed
05/09/2022	Email	Bloor Homes	Representation received from Bloor Homes for the non statutory Targeted Consultation
05/10/2022	Email	Bloor Homes	Bloor Homes solicitors issue a letter in reply to the non statutory targeted consultation and requested meeting to discuss the revised changes, specifically in relation access to Site A.
11/10/2022	Email	Bloor Homes / GCC PM	GCC project manager responds that following their call with Bloor Homes, he will facilitate a meeting with the relevant Atkins/ GCC staff. GCC PM will pause meeting between him and Bloor Homes.
21/11/2022	Email	Bloor Homes / Atkins PM	Atkins PM shared M5 J10 highway layout and flood model outputs with Bloor Homes.
22/11/2022	Email	Bloor Homes / Atkins PM	Atkins PM shared above email again due to failed delivery notification. Bloor Homes acknowledge receipt of email.
27/05/2023	Email	Bloor Homes / Atkins PM	Atkins PM shared a copy of the draft SoCG and the following finalised draft DCO documents; <ul style="list-style-type: none"> • Planning Statement • Environmental Statement (Non-technical summary, chapters 1-15 and figures) • Environmental Management Plan • Transport Assessment • Register of Environmental Actions and Commitments • Environmental Masterplans • General Arrangement Drawings • Works Plans

3. Topics covered in this SoCG

3.1.1. The following table is a summary of the topics which may be considered within this SoCG.

Table 3-1 - Summary of topics considered within this SoCG

Overarching topic	Topic Number	Topic
Background	1.	Principle of Development
	2.	Statutory Consultation
Relevant ES Chapter	3.	Assessment of Alternatives
	4.	Environmental Impact Assessment Methodology
	5.	Air Quality
	6.	Noise and Vibration
	7.	Biodiversity
	8.	Road Drainage and the Water Environment
	9.	Landscape and Visual
	10.	Geology and Soils
	11.	Cultural Heritage
	12.	Materials and Waste
	13.	Population and Human Health
	14.	Climate
	15.	Assessment of Cumulative Effects
Other Topics	16.	Engineering Design
	17.	Draft Development Consent Order
	18.	Land
	19.	Environmental Management Plan
	20.	Construction Traffic Management Plan
	21.	Junction Design

4. Matters Agreed

4.1.1. Table 4-1 will show those matters which have been agreed, including the matter reference number, and the date and method by which it was agreed.

Table 4-1 will be added to as the SoCG process is progressed.

Table 4-1 - Summary of topics considered within this SoCG

Matter Reference number	Position	Date and method of agreement
1.	Principle of Development	
1.1		
1.2		
2.	Statutory Consultation	
2.1		
3.	Assessment of Alternatives	
4.	Environmental Impact Assessment Methodology	
5.	Air Quality	
6.	Noise and Vibration	
7.	Biodiversity	

Matter Reference number	Position	Date and method of agreement
8.	Road Drainage and the Water Environment	
9.	Landscape and Visual	
10.	Geology and Soils	
11.	Cultural Heritage	
12.	Materials and Waste	
13.	Population and Human Health	
14.	Climate	
15.	Assessment of Cumulative Effects	
16.	Engineering Design	
17.	Draft Development Consent Order	
18.	Land	

Matter Reference number	Position	Date and method of agreement
19. Environmental Management Plan		
20. Construction Traffic Management Plan		

5. Matters Outstanding

5.1. Principal matters outstanding

5.1.1. There are currently no principal matters outstanding between Applicant and Option holders/developers for the Safeguarded Land adjacent to Junction 10.

5.2. Matters outstanding

5.2.1. Table 5-1 shows those matters that are outstanding between the parties, including that matters reference number, and the date of the latest position.

Table 5-1 - Summary of topics considered within this SoCG

Matter Reference Number	Position of interested party	Response	Date of the last position
1. Principle of Development			
1.1	<p>It is beyond question that the identified need for the Scheme is related to the future development of land to the North West and West of Cheltenham. This plainly includes the Safeguarded Land at North West Cheltenham which is identified as one of three Development Areas on page 7 of the Statutory Consultation brochure.</p> <p>In this regard, the Scheme’s objectives listed at Section 2.2 of the PEIR and page 7 of the Statutory Consultation brochure include:</p> <p style="padding-left: 40px;">“Support[ing] economic growth and facilitate growth in jobs and housing by providing improved transport network connections in west and north-west Cheltenham.”</p> <p>Future development of the Safeguarded Land is intrinsically part of the scale of development envisaged at Cheltenham. The Statutory Consultation refers to the Safeguarded Land as:</p>	<p>The Council as Scheme promoter recognises the status of the land your client has options over. The land which is affected by the access arrangements is Safeguarded Land identified in the Joint Core Strategy. This means that, whilst the land benefits from being safeguarded for potential future development.</p> <p>One of the proposed objectives of the Scheme is to “support economic growth and facilitate growth in jobs and housing by providing improved transport network connections in west and north-west Cheltenham”.</p> <p>It is the Council’s view that its proposals will meet this objective through the proposed provision of infrastructure and capacity to the local and national route network. In this regard, the Scheme is facilitating the potential future development of the Safeguarded Land by improvements to the A4019,</p>	21.11.22

	<p>“Land which has been identified for development in the future and is protected from conflicting development” (page 7).</p> <p>The role of Safeguarded Land is set out in the JCS at paras 4.5.24 – 4.5.24 of the supporting text to Policy SD5. It notes:</p> <ul style="list-style-type: none"> The new boundaries identified on the Green Belt map have also taken into account longer-term need by identifying safeguarded land which may be required beyond this plan period to ensure that the Green Belt does not need an early review. <p>The safeguarded areas for future growth have been in an area where the threat of coalescence between Gloucester and Cheltenham, and between Cheltenham and Bishop’s Cleeve, is reduced, and where new development can be fully integrated into the existing urban form.</p> <p>The proposed new access to the Safeguarded Land does not provide a satisfactory means of access and creates uncertainty and doubt as to the deliverability of the access to facilitate the development of the Safeguarded Land and to realise future economic and housing development. The Scheme’s objectives will consequently not be achieved.</p>	<p>including improvements to the access to and from Junction 10 of the M5.</p> <p>Given that the land is not allocated for development at the present time, with planning permission for the development of the Safeguarded Land only possible following a review of the JCS (2018 JCS Issues and Options Consultations, para 12.9), it is important that the Council’s proposals reflect this. The current intention to deliver a signalised junction on to Tewkesbury Road is considered sufficient to meet the Scheme’s objectives, allowing more detailed access arrangements to be put in place once there is more certainty and detail around any development of the Safeguarded Land over which your client holds options.</p>	
2. Consultation			
2.1	<p>Cost Recovery. It is understood that the costs of the Scheme are proposed to be recovered in part from future development (e.g. by way of an infrastructure recovery scheme). Where the Scheme does not facilitate development of the Safeguarded Land north of Tewkesbury Road, it is difficult to see how costs from that development can be fully justified and recovered given that any additional costs which those landowners would need to bear to upgrade the means of access and construct an additional length of road would clearly be</p>	<p>The Council’s position is that the Scheme does facilitate development of the Safeguarded Land through the proposed provision of infrastructure and capacity to the local and national route network. Existing JCS policy enables GCC to request contributions to the delivery of infrastructure where such infrastructure is a necessary mitigation for the associated development.</p>	21.11.2022

	germane to whether and to what extent such a contribution could be justified.		
3. Assessment of Alternatives			
3.1	The EIA Scoping Report (July 2021) for the Scheme sets out the alternatives considered by GCC in developing the Scheme. However, no alternatives were considered for the location of the access to the Safeguarded Land- the only solution presented provides access into land under the control of GCC. A reasonable alternative would have been to locate the access slightly further east into land under the control of our client. GCC has consequently failed to consider all reasonable alternatives, without which, there can be no rationale or justification for this being the optimum solution.		
4. Environmental Impact Assessment Methodology			
5. Air Quality			
6. Noise and Vibration			
7. Biodiversity			
7.1	The Scheme proposes additional ecology mitigation in the form of hedgerow planting within the Safeguarded Land, including on part of the land under the control of our client. No consideration has been given as to how this hedgerow planting could be retained as development comes forward and whether this might risk severing development and/or result in inefficient or isolated development. These additional provisions are contrary to the requirements of JCS Policy SD5 Part 7(v).	The extent of the hedgerow identified for proposed mitigation aligns with the concept plan for the Safeguarded Land shared with the promoter by White Peak Planning on 22nd April 2022.	21.11.2022
8. Road Drainage and the Water Environment			

8.1	The flood storage area south of Tewkesbury Road is noted as offering potential to contribute to the open space and biodiversity requirements of Site A, as well as mitigating the flood risk within the site. Further details of this potential arrangement need to be provided before our client is able to respond.	Following further consideration, the area South of Tewkesbury Road will remain in private ownership and will not be opened to the public.	21.11.2022
9. Landscape and Visual			
10. Geology and Soils			
11. Cultural Heritage			
12. Minerals and Waste			
13. Population and Human Health			
13.1	Plan DR-CH-000007 indicates that an existing Public Right of Way ("PROW") which crosses the Safeguarded Land will be diverted via a new underpass beneath Tewkesbury Road. The exact diversion route is unclear, but it has the potential to prejudice efficient delivery of housing and employment within the Safeguarded Land. The existing PROW terminates at Tewkesbury Road. It is unclear why it is necessary to extend the PROW to utilise the new underpass, which would make it more difficult to divert or extinguish within the Safeguarded Land in the future.	It is proposed to divert the PROW along new PMA to the underpass as this would provide NMUs, particularly equestrians, with a safer crossing of the A4019. Provision of a Pegasus crossing at the existing termination of the PROW has been considered but is not being taken forward due to issues with providing a safe waiting area for horses in the central reserve (at or away from the Link Rd Jct). The proposed diversion is not considered to prejudice any future proposals for the Safeguarded Land.	21.11.2022
14. Climate			

15. Assessment of Cumulative Effects			
16. Engineering Design			
17. Draft Development Consent Order			
18. Land			
18.1	<p>The proposed new junction stops on land owned by Gloucestershire County Council ("GCC") and does not extend to the boundary of that land to enable access to the land beyond. This raises the unsatisfactory spectre of a further length of road being required to be constructed across land owned by GCC in order to access the overwhelming majority of the future development area. The consequence of this is that it creates uncertainty, and potentially an impediment, to delivery of an access to the remaining development areas. In particular, loss of direct access onto adopted public highway in this location will significantly compromise our client's ability to properly design and optimise the use of the Safeguarded Land. Once again, in these terms, this proposed new junction does not meet the Scheme's objectives.</p>	<p>The proposed infrastructure (culverts, ducts etc) to allow for an expanded junction to be constructed on land designated as part of the Safeguarded Land, should that be required in due course, which does not prejudice the development of the Safeguarded Land as identified by the JCS, will be put in place. In terms of access to the highway, the Scheme will ensure that an equivalent level of access to what landowners currently have to the Safeguarded Land is maintained. In relation to any future access arrangements needed for the development of the Safeguarded Land, the position of GCC as landowner is separate from GCC as Local Highway Authority and Scheme promoter but the Council will, of course, look to help facilitate private development coming forward where it can, in line with its statutory duties.</p>	21.11.2022
19. Environmental Management Plan			
20. Construction Traffic Management Plan			
21. Junction Design			

<p>21.1</p>	<p>The current additional targeted non-statutory consultation proposes to alter the access to the Safeguarded Land for a third time. In 2020, this was proposed as a roundabout. Earlier in 2022, it was a signalised junction onto Tewkesbury Road extending into the Safeguarded Land as shown on page 10 of the Statutory Consultation brochure. And now it is a much smaller signalised junction onto Tewkesbury Road extending only as far as an access track which is to be formed parallel to Tewkesbury Road (Inset A of Drawing 00007 refers).</p> <p>Whilst it remains the case that no traffic data has been published to enable consideration of the capacity of this new proposed junction, the nature and scale of what is proposed plainly has limitations when compared with the previous proposed arrangements. Without doubt, future works and upgrading of this junction will be required to make it fit for purpose to serve as a satisfactory access for traffic associated with development of the Safeguarded Land at the scale proposed. As such, this new proposed junction is deficient and will not meet the Scheme's objectives.</p>	<p>Whilst providing field access for the current landowners, what the Scheme is unable to do is to provide specific access arrangements to enable future Safeguarded Land development.</p> <p>The design and alignment of the Scheme has been through several key reviews, commencing with alternative alignments and options for the Scheme that were considered in the October – November 2020 Informal Consultation. At the informal consultation stage several options were tabled, including an option for a new junction to the north of Junction 10 with an access road connecting back to the A4019 across the Safeguarded Land. This option was amongst others that identified a roundabout to cater for the new motorway traffic. As reported at our Preferred Route Announcement, these options were discounted following the informal consultation and further design development and the Scheme now proposes a revised Junction 10 in its current location and a signalised junction on the A4019 to serve the West Cheltenham development (the Link Road) to the south and landowner access to the north, as shown on Drawing 00007 – Inset A.</p> <p>Subsequent to the formal consultation exercise, and following a careful design rational and costing review, the access that was included in the statutory consultation was deemed too substantial given the planning status of the Safeguarded Land. It was concluded that it would not be appropriate for the Scheme to provide such a significant access due to</p>	<p>21.11.2022</p>
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		<p>the likely timeframes for the development of Safeguarded Land and the additional cost involved for the Scheme.</p> <p>Whilst it is recognised that the precise access arrangements will need to be subject to more detail when/if the land is brought forward, it is considered that the proposed signalised junction represents the most proportionate solution until such time as the Safeguarded Land is consented for development, potentially post 2031 and beyond. No other alternative options have been raised by third parties as part the consultation exercises.</p>	
21.2	<p>Second Point of Access. Our client has repeatedly reiterated the need for a second point of access to the Safeguarded Land. It is highly unusual for a development of this size to have a single point of access, with a second access specified wherever possible to provide resilience to the highway network, to spread the impact of development traffic, and to enable emergency vehicle access.</p> <p>The amended Scheme provides a widened central reservation so that a second access could be provided in future. The potential design of the second access has not been presented, and, as such, there is no comfort that this could, in fact, be provided to an appropriate standard.</p>	<p>The proposed Scheme facilitates the potential need for further access points (for example via the widened central reservation) however it isn't part of the Scheme to deliver secondary access points to the Safeguarded Land, which will, of course, form part of the proposals for development of the Safeguarded Land in so far as is necessary in due course. Discussion of secondary access requirements should be taken up with GCC Highways Development Management.</p>	21.11.2022
21.3	<p>For the above reasons, the proposed new access to the Safeguarded Land does not provide a satisfactory means of access and creates uncertainty and doubt as to the deliverability of the access to facilitate the development of the Safeguarded Land and to realise</p>	<p>It is the position of GCC, as Scheme promoter, that the proposed infrastructure (culverts, ducts etc) allows for an expanded junction to be constructed on land designated as part of the Safeguarded Land, should that be required in due course, which does</p>	21.11.2022

	<p>future economic and housing development. The Scheme's objectives will consequently not be achieved.</p>	<p>not prejudice the development of the Safeguarded Land as identified by the JCS. In terms of access to the highway, the Scheme will ensure that an equivalent level of access to what landowners currently have to the Safeguarded Land is maintained. In relation to any future access arrangements needed for the development of the Safeguarded Land, the position of GCC as landowner is separate from GCC as Local Highway Authority and Scheme promoter but the Council will, of course, look to help facilitate private development coming forward where it can, in line with its statutory duties.</p>	
<p>21.4</p>	<p>The Scheme as now proposed will consolidate several existing farm accesses and an access road to a traveller site into a single access, served via an access track from the new signalised junction. The issues associated with this arrangement have already been well articulated by the owner of the land in question. In particular, the design, as currently proposed, is fundamentally unacceptable as it is inappropriately sized to accommodate frequent large vehicle access to multiple properties and, as a consequence, creates potential conflicts and danger of accidents with vehicles accessing the traveller site.</p> <p>Please confirm that the proposed new access has been signed off by highways officers as being fit for its intended users and that they are satisfied that it does not propose a safety risk. Further, the existing farm accesses onto Tewkesbury Road benefit from a high level of natural surveillance and this will be removed, placing the landowners at a significant risk of fly tipping, anti-social behaviour and crop damage. It is also not clear from the Scheme plans who will be responsible for the management and maintenance of the shared access</p>	<p>The scheme has consolidated the existing farm accesses in order to provide safe left and right turning manoeuvres under the traffic signal control provided by the Link Road Junction. This has been designed to accommodate the anticipated farm traffic. GCC's land agents will be liaising with the landowners on this and additional details will be provided as required.</p>	<p>21.11.2022</p>

	track. Any requirement for the landowner to fund, or part-fund its maintenance is unacceptable.		
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Appendices



Appendix A.

- A.1.1. There are some matters which the position of Bloor Homes is pending upon publication of the full suite of DCO application documents, in particular those relating to the Environmental Statement (ES).
- A.1.2. The Applicant will continue to review matters with Bloor Homes during the examination of the DCO application and discussions will be aided by Bloor's being able to review the full suite of DCO application documents on the National Infrastructure Planning website (at the point of submission).

Table A-1- Matters to be determined between the Applicant and the Developer

Ref	Matter	Position	Date of the latest position

ATKINS

Member of the SNC-Lavalin Group

5th Floor, Block 5
Shire Hall
Bearland
Gloucester
GL1 2TH

Tel: +44 (0) 8000 514 514