

# M5 Junction 10 Improvements Scheme

Statement of Common Ground  
Joint Councils  
TR010063 - APP 8.2

Regulation 5 (2) (q)

Planning Act 2008

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

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# Infrastructure Planning Planning Act 2008

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

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

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#### 8.2 Statement of Common Ground – Joint Councils

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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) the Joint Councils.

Signed

On behalf of Gloucestershire County Council

Date:

Signed

On behalf of the Joint Councils

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 the 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.
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.

Term	Meaning / Definition
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	Designation of a proposed option as a 'preferred route' by the Department for Transport and provides a form of planning protection from development of land in the vicinity of the M5 Junction 10 improvement 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.
(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 this Document

1.2.1 This document is a Statement of Common Ground (SoCG) between GCC (the Applicant) and the Joint Councils in relation to the M5 J10 Improvements Scheme. The Joint Councils being:

- Gloucestershire County Council;
- Tewkesbury Borough Council; and
- Cheltenham Borough Council.

1.2.2 The document identifies the following between the parties:

- A record of key consultation / correspondence.
- 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 that which 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 generally consistent form and sets out the matters which are agreed, the matters subject to further discussion and those matters which are not agreed. Each SoCG has been tailored according to the approach agreed with the interested party concerned.

1.3.2 Each 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 with the interested party; and
- 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. Status of this SoCG

1.3.4 This SoCG is a correct reflection of the position of both parties at the pre-application stage.



- 1.3.5 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 as the Applicant

- 2.1.1 Gloucestershire County Council (GCC) is the Highway Authority for Gloucestershire and the Applicant for the M5 Junction 10 Improvements Scheme. GCC will promote and deliver the Scheme with support from National Highways and Homes England.

### 2.2 The Role of the Joint Councils

#### Gloucestershire County Council as Statutory Consultee

- 2.2.1 The Scheme is situated wholly within the boundaries of GCC. 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”).
- 2.2.2 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 and flood risk, and heritage assets and archaeology.
- 2.2.3 GCC also has statutory duties relating to Public Rights of Way (PRoW) and therefore will consider provision for walking, cycling and horse riding (WCH) within the Scheme.

#### Tewkesbury Borough Council

- 2.2.4 The Scheme is partially situated within the boundaries of Tewkesbury Borough Council. It is therefore a statutory consultee for the Scheme, as defined under section 42(1)(b) and section 43(b) of the Act.
- 2.2.5 Tewkesbury Borough Council is the local planning authority for Tewkesbury borough.

#### Cheltenham Borough Council

- 2.2.6 The Scheme is partially situated within the boundaries of Cheltenham Borough Council. It is therefore a statutory consultee for the scheme, as defined under section 42(1)(b) and section 43(b) of the Act.
- 2.2.7 Cheltenham Borough Council is the local planning authority for Cheltenham Borough.

### 2.3 Summary of consultation

- 2.3.1 GCC (the applicant) has been in consultation with the Joint Councils 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 the Joint Councils 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.
- 2.3.3 The consultation with the Joint Councils since the Preferred Route Announcement on 16th June 2021 is set in Table 2-1 below.

Table 2-1 - Consultation with CBC, GCC, TBC

Date	Method	Parties concerned	Matters Discussed
16/06/2021	Email	CBC/ GCC/ TBC	M5 Junction 10 Improvements Scheme preferred route announcement email sent
17/06/2021	Member Briefing	GCC	GCC thanked GCC councillor for attending meeting and agreed to get back in contact with further information on points raised, namely carbon, Biodiversity Net Gain (BNG) and flood mitigation.
21/06/2021	Email	GCC	Following on from members Briefing on 17/06/2021 GCC councillor stated that issues raised need time to consider and provided comments, questions and thoughts on the scheme. GCC project team responded confirming that they will be back in contact with comments. 29/06/2021 councillor maintained that the scheme should take climate change seriously and is happy to work with the GCC project team on this aspect as not much is happening political level. GCC project team responded.
25/06/2021	Letter	CBC	A letter providing the Local Planning Authority with notice of Gloucestershire County Council's proposed highways improvements.
28/06/2021	Letter	TBC	A letter providing the Local Authority with notice of Gloucestershire County Council's proposed highways improvements.
14/07/2021	Meeting – virtual	CBC/ GCC/ TBC/ Atkins (Planning team, environment lead, Project Manager/ Stakeholder engagement)	First of a series of planning liaison meetings to keep host planning authorities up to speed with M5 Junction 10 improvements DCO. Matters discussed include: Environmental update on programme for Environmental statement Resourcing issues with host authorities, Atkins PM noted this and agreed to see how the project can help with this. Consultation and stakeholder engagement confirm the strategy going forward.
15/07/2021	Email	GCC	Atkins comms team sent Parish Council engagement summary to GCC
21/07/2021	Email	GCC	GCC project team sent updated report from Members monthly meeting to GCC planning officers. Email also informed the officers that Cabinet approval was granted for the procurement progression of Arle Court Transport Hub
03/08/2021	Email	GCC	GCC Councillor added more concern on carbon auditing for road building/ improvement projects and requested information on how the carbon footprint of the road improvement. Building project is being calculated. GCC project team responded outlining the methodology used for the EIA.
05/08/2021	Email	CBC / GCC	GCC project team sent update to CBC councillor regarding statutory consultation (scheduled for late 2021) and informed that the Scheme has been classified as a Nationally Significant Infrastructure Project (NSIP) and a Development Consent Order (DCO) application is due to be made in late 2022

Date	Method	Parties concerned	Matters Discussed
11/08/2021	Meeting - virtual	CBC/ GCC/ TBC/ Atkins (Planning team, environment lead, Project Manager/ Stakeholder engagement)	Planning Liaison meeting, matters discussed include: Stakeholder engagement team discussed with LPA's queries on the SoCC, and how to approach consultations, with support for council briefings. Atkins team acknowledge resourcing difficulties, and the project planned to identify where it can give LPA's an idea on the level of resourcing required.
16/08/2021	Email	GCC/ Carter Jonas (CJ)	Carter Jonas (CJ) are the land referencing consultant for the Scheme operating on behalf of the Applicant. CJ, sent a request for update on landowner negotiations as Atkins, CJ and GCC project team had been receiving contacts regarding negotiations. CJ wanted to be able to give an official response to these types of enquiries from the public. GCC project team responded stating landowners would receive a further update in 4-6 weeks.
18/08/2021	Email	CJ / Atkins / GCC	CJ confirmed that the letter with update for landowners has been sent via post and attached a copy of the letter.
23/08/2021	Email	Atkins / GCC	Atkins request Landscape Character Data from GCC ecology department.
08/09/2021	Meeting Virtual	CBC/ GCC/ TBC/ Atkins (Planning team, environment lead, Project Manager/ Stakeholder engagement)	Planning liaison meeting. Matters discussed include: Update on SoCC provided Atkins advised the project to approach Homes England directly for capacity funding and outlined likely required inputs from the regulatory teams. Environment team confirmed the PEIR is in final draft stages
16/09/2021	Email	CBC	GCC project team emailed CBC councillor and informed them that a letter has been sent to contact all residents on Homecroft Drive and those east of the Fire Station along A4019 to invite them to attend drop-in sessions with GCC project team to discuss highway improvement proposals in advance of the statutory consultation planning for December 2021.
22/09/2021	Email	CBC	GCC emailed CBC officer to get confirmation of the list of local transport schemes complied either in progress or proposed involving public transport and active modes in the area around M5 J10
23/09/2021	Email	CBC	CBC officer response confirmed that GCC had been dealing with local schemes. Link to Supplementary Planning Document (SPD) provided and GCC officers copied in. GCC requested further information from the GCC officers to provide insight into other schemes that were listed.

Date	Method	Parties concerned	Matters Discussed
23/09/2021	Email	TBC	Email sent to request confirmation of the list of local transport schemes compiled either in progress or proposed involving public transport and active modes, in the area around M5 J10. TBC advised that GCC would be able to provide the information requested as they are responsible for public transport schemes
23/09/2021	Email	CBC / GCC / TBC	Atkins planning shared SoCC with CBC/ GCC/ TBC planning officers and requested comments.
24/09/2021	Email	GCC	GCC planning officer acknowledged email containing SoCC and stated they will provide the views of GCC as a statutory consultee by 22nd October 2021.
28/09/2021	Email	Atkins / GCC	Atkins planning issued high-level programme for M5 J10the Scheme that focussed on the DCO deliverables and consultation requirements.
29/09/2021	Email	GCC/ Atkins	Atkins requested GIS data set for Minerals Safeguarding inclusion on map figures for the environmental assessment.
07/10/2021	Email	GCC	GCC planning officer responded with comments on SoCC
12/10/2021	Email	CBC	CBC Councillor emailed distribution list of prescribed consultees and sample notification for address confirmation
13/10/2021	Email	CBC	Contacted to confirm the address for consultation materials to be sent to.
13/10/2021	Meeting Virtual	CBC/ GCC/ TBC/ Atkins (Planning team, environment lead, Project Manager/ Stakeholder engagement)	<p>Planning liaison meeting, matters discussed include:</p> <p>Stakeholder consultation presentation covering the consultation materials, events, and documents was shared</p> <p>Confirmation that the Planning Inspectorate (PINS)PINS will have a light touch until the project is closer to submission, PINS case officers shared with LPAs</p> <p>Request for gap funding from Homes England has been submitted, awaiting outcome</p> <p>Environment team confirm the PEIR is advanced and undergoing internal review. LPAs query the response expected, Atkins confirm LPA can comment on any part, does not have to be every chapter.</p>
14/10/2021	Email	TBC	TBC planning officer contacted to confirm the address so consultation documents can be shared via USB
01/11/2021	Email	CBC	GCC sent notification to CBC planning officers stating that SoCC considered accepted as there were no comments made within the 28 day deadline and will proceed with the DCO pre-application consultation process as set out in the SoCC.

Date	Method	Parties concerned	Matters Discussed
01/11/2021	Email	TBC	Atkins planning informed TBC planning officer that the SoCC is considered accepted as there were no comments made within the 28 day deadline and will proceed with the DCO pre-application consultation process as set out in the SoCC.
03/11/2021	Email	Atkins/ GCC	Notification sent to GCC planning officer to confirm their postal address for consultation USB delivery. GCC request Atkins to consider various means of providing consultation materials. Atkins checked statutory requirements and confirmed USB would be issued to GCC planning officers address. GCC also request virtual presentation on consultation materials.
10/11/2021	Meeting Virtual	CBC/ GCC/ TBC/ Atkins (Planning team, environment lead, Project Manager/ Stakeholder engagement)	Planning liaison meeting, matters discussed include: Reminder for consultation dates/ milestones A technical officer briefing offered to LPAs to outline the PEIR ahead of statutory consultation confirmed £35K gap funding from Homes England to be spent by the end of the final year Discussion on the approach to consultation responses as joint councils or individual authorities. Agreed that GCC respond separately, TBC and CBC to give joint response coordinated via consultant (Atkins in a separate office to differentiate between Atkins role as promoter).
06/12/2021	Email	GCC	Consultation notification sent to GCC planning officer and updates on USB delivery. GCC planning officer confirmed that USB was received via post.
06/12/2021	Email	GCC	FileTransfer link shared with GCC planning team to access consultation
06/12/2021	Email	TBC	Stakeholder pack shared with TBC officer; confirmation of receipt received.
07/12/2021	Email	CBC	Stakeholder information pack shared with CBC officer.
07/12/2021	Email	CBC	Pre-consultation notification sent for statutory consultation. CBC replied to expressing concern that link on Pg. 24 of Preliminary Environmental Impact Report (PEIR) was not working. 09/12/2021- live link sent via email.
07/12/2021	Meeting- Member Briefing	CBC	GCC project team member suggested arranging a call to discuss consultation with CBC member who was not available during the meeting.
07/12/2021	Meeting- Member Briefing	GCC	Summary of associated actions from the Member's briefing sent to all councillors

Date	Method	Parties concerned	Matters Discussed
08/12/2021	Meeting – Officer Technical Briefing	CBC/ GCC/ TBC / Atkins (Planning team and technical officers, ecology, drainage, heritage climate, landscape)	An in-depth presentation to CBC, TBC and GCC technical officers by Atkins technical leads on the content of the PEIR ahead of the statutory consultation.
11/01/2022	Email	Atkins/ GCC.	Atkins environment lead receive request from GCC Heritage officer for a shapefile showing the redline boundary for the scheme. Shapefile sent 12/01/2022
03/02/2022	Meeting – Virtual	CBC/ GCC/ TBC/ Atkins (Planning team, Environment lead, Project Manager/ Stakeholder engagement)	Planning Liaison meeting, matters discussed include: Consultation progress update on responses so far and key themes. Overall update on DCO status, and current actions to arrange SoCG, drawing on other example DCOs as starting point. Queries raised over how the document will be managed and evolve.
09/03/2022	Meeting - Virtual	CBC/ GCC/ TBC/ Atkins (Planning team, environment lead, Project Manager/ Stakeholder engagement)	Planning liaison meeting, matters discussed include: Full consultation update outlining survey response statistics, key themes and next steps following the consultation including production of Consultation summary, DCO consultation report. Query raised regarding funding for authorities and how legal representative will be appointed. Agreed, that a single joint legal representative will be funded via Homes England funding Queries raised on Gypsy Traveller site in TBC as this will need to be considered a sensitive receptor in the ES. TBC agreed to speak to officers in their team dealing with the site
23/03/2022	Email	TBC	TBC planning officer emailed Atkins environment lead regarding issue of the unauthorised Gypsy Traveller Site at Withybridge and confirmed that the council intends to take necessary steps to ensure the site is cleared of caravans and any unauthorised residential occupation. Atkins thanked TBC for the information and queried whether there is a timeline for this and if all occupation on the site was unauthorised or if there was some authorised occupancy. TBC state there is no timeline yet, and to their knowledge all residential occupation on the site is unauthorised on the land.
13/04/2022	Meeting Virtual	CBC/ GCC/ TBC/ Atkins (Planning team, environment lead, Project Manager/	Planning liaison meeting, matters discussed include: Gypsy traveller site, TBC officer confirmed the issue is not straightforward, there is intent to injunct them, but timescales are unknown The proposed DCO traffic model presented



Date	Method	Parties concerned	Matters Discussed
		Stakeholder engagement)	JCS status and programme Bid for Homes England funding submitted, includes time for LPA officers or officer replacements including consultants (Atkins) and time for legal support.
27/04/2022	Email	Atkins environment / GCC environment	Note sent to GCC officer documenting flood modelling undertaken at Old Gloucester Road B4634 and requested comments.
11/05/2022	Meeting Virtual	CBC/ GCC/ TBC/ Atkins (Planning team, environment lead, Project Manager/ Stakeholder engagement)	Planning liaison meeting, matters discussed include: SoCG update, template explained. LPAs to sign off front sections of the SoCG report draft Consultation summary report available on GCC scheme webpage. Consultation letters in response to representations from stakeholders to be emailed this week. As design is progressing Atkins suggest a more detailed run through of the route and to highlight design changes resulting from consultation Traveller site update -TBC officer confirmed that notice has been served on all occupiers of the site, but it will not be a quick process. Occupiers are not from travelling community and therefore do not have protected status. It is suggested that for the purpose of the ES it is safest to assume the site will be occupied. Agenda for next 4 months of meetings suggested.
10.08.2022	Meeting Virtual	CBC/ TBC/ GCC Atkins (Planning team, environment lead, Project Manager/ Stakeholder engagement)	SoCG progress discussed and approach to SoCG updates agreed.
12.08.2022	Email	Atkins / Officers from GCC/ CBC/ TBC	Draft SoCG shared with Joint Councils in editable format for comment
09.09.2022	Email	GCC officer	Comments received on draft SoCG responding to matters raised responses, and updated position of GCC.
14.09.2022	Meeting Virtual	Officers from CBC/ GCC/ TBC/ Atkins (Planning team, environment lead, Project Manager/ Stakeholder engagement)	Funding update provided for the project, and SoCG feedback provided.



Date	Method	Parties concerned	Matters Discussed
		GCC project team	
22.09.2022	Email	GCC Officer	Further comments received on draft SoCG clarifying agreement in relation to matters 14.6, 16.6, 16.7 and 16.8 (previously matters 27.6, 31.5, 31.6, 31.7)
27.09.2022	Email	Agent acting on behalf of TBC/ CBC	Comments received on the draft SoCG responding to matters raised and clarified the updated position of TBC/CBC.
02.11.2022	Meeting Virtual	Officers from CBC/ GCC/ TBC/ Atkins (Planning team, environment lead, Project Manager/ Stakeholder engagement)	General update on SoCG progress, and DCO progress for the project.
15.02.2023	Meeting Virtual	Officers and representatives from GCC/ CBC and TBC/ Atkins (Planning team, environment lead, Project Manager / Stakeholder engagement) / Applicant	Update on the position of the Scheme. Officers were informed of a delay to the Scheme due to Homes England Treasury reviewing funding on all Housing Infrastructure Fund (HIF) projects nationally. It was confirmed that the length of the delay was unknown, but the Councils will be updated when information is available.  Preparation for DCO submission will continue and there is intention to share finalised drafts of DCO documents with the Joint Councils to enable a full review of the ES as part of the SoCG process.

Date	Method	Parties concerned	Matters Discussed
03.05.2023	Meeting Virtual	Officers and representatives from GCC/ CBC and TBC/ Atkins (Planning team, environment lead, Project Manager / Stakeholder engagement)	<p>Officers informed of upcoming targeted consultation for a proposed bus lane on the A4019.</p> <p>Officers informed that DCO documentation is close to being ready for DCO submission and there is intention to share these with the Joint Councils soon so the SoCG can be updated ahead of submission and examination.</p> <p>Issue raised around the Homes England capacity funding which CBC/ TBC used previously to aid the SoCG process. At this point the funding is not confirmed (associated with Homes England funding review). This funding is required for CBC and TBC to complete the review of documents, therefore there may be difficulty reviewing the documents.</p>
16.05.2023	Email	GCC Planning Officer	<p>The following DCO documents were shared with the GCC planning officer for review:</p> <ul style="list-style-type: none"> <li>• Planning Statement</li> <li>• ES (Non-technical summary, Chapter 1-15 and figures)</li> <li>• Environmental Management Plan</li> <li>• Register of Environmental Actions and Commitments</li> <li>• Environmental Masterplan</li> <li>• General Arrangement Drawings</li> <li>• Works Plans</li> </ul> <p>Deadline for receipt of comments set for 9<sup>th</sup> June.</p>
16.05.2023	Email	CBC Planning Officer	<p>The following DCO documents were shared with the CBC planning officer for review:</p> <ul style="list-style-type: none"> <li>• Planning Statement</li> <li>• ES (Non-technical summary, Chapter 1-15 and figures)</li> <li>• Environmental Management Plan</li> <li>• Register of Environmental Actions and Commitments</li> <li>• Environmental Masterplan</li> <li>• General Arrangement Drawings</li> <li>• Works Plans</li> </ul> <p>Deadline for receipt of comments set for 9<sup>th</sup> June.</p>

Date	Method	Parties concerned	Matters Discussed
16.05.2023	Email	TBC Planning Officer	The following DCO documents were shared with the TBC planning officer for review: <ul style="list-style-type: none"> <li>• Planning Statement</li> <li>• ES (Non-technical summary, Chapter 1-15 and figures)</li> <li>• Environmental Management Plan</li> <li>• Register of Environmental Actions and Commitments</li> <li>• Environmental Masterplan</li> <li>• General Arrangement Drawings</li> <li>• Works Plans</li> </ul> <p>Deadline for receipt of comments set for 9<sup>th</sup> June.</p>
23.05.2023	Email	GCC Planning Officer	GCC Planning Officer requested a copy of the latest version of the SoCG to complete the review of documentation.
23.05.2023	Email	GCC Planning Officer	GCC Planning Officer sent request for Transport Assessment to review.
24.05.2023	Email	GCC Planning Officer	GCC Planning Officer sent further request for updated SoCG in order to consult colleagues and highlight areas where there may still be matters of concern. An extension for completing the review was also requested due to resourcing constraints.  Atkins planner response sent with copy of latest version of the SoCG and agreement to extend deadline to 23 <sup>rd</sup> June.
24.05.2023	Email	CBC Planning Officer	Atkins planner sent copy of the latest SoCG and extension to the deadline in accordance with correspondence with GCC planning officer.
24.05.2023	Email	TBC Planning Officer	Atkins planner sent copy of the latest SoCG and extension to the deadline in accordance with correspondence with GCC planning officer.
26.05.2023	Email	GCC Planning Officer	Atkins shared Transport Assessment document with GCC Planning Officer to review as part of the SoCG process.
26.05.2023	Email	CBC Planning Officer	Atkins shared Transport Assessment document with CBC Planning Officer to review as part of the SoCG process.

Date	Method	Parties concerned	Matters Discussed
26.05.2023	Email	TBC Planning Officer	Atkins shared Transport Assessment document with TBC Planning Officer to review as part of the SoCG process.
30.05.2023	Email	Representative for TBC/ CBC	Email received stating that discussions are ongoing between GCC, CBC, and TBC regarding the availability of capacity funding from Homes England which was to enable the Local Authorities to engage consultancy assistance in the DCO process. As such, comments on the SoCG cannot be returned by the proposed deadline. An extension to the 7 <sup>th</sup> July was requested.
22.06.2023	Email	GCC Planning Officer	GCC Planning Officer provides a response and comments in relation to the DCO documentation that was issued on 16.05.2023. Comments received on Chapter 11, 12, 13, and 14. Comments on the Transport Assessment are still expected.
10.07.2023	Email	TBC/ CBC	A joint response was received confirming they have no comments at this stage on the Statement of Common Ground, however we reserve our right to make amendments at the next stage.

## 3 Topics covered in this SoCG

3.1.1 The following table is a summary of the topics which are 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

## 4 Matters Agreed

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

Table 4-1 - Matters agreed between the Applicant and Joint Councils

Matter Reference number	Parties Concerned	Matter which has been agreed	Position	Date and method of agreement
1.		Principle of Development		
2.		Statutory Consultation		
3.		Assessment of Alternatives		
4.		Environmental Impact Assessment Methodology		
4.9	GCC	<p>GCC sought early discussion regarding the DCO requirement necessary to secure the production and implementation of the AMP. The AMP should be included in the glossary as it is referred to 11 times.</p> <p>The AMP is expected to form part of the Register of Environmental Actions and Commitments (REAC) that will be a requirement of the Development Consent Order (DCO).</p>	After reviewing the draft ES Chapter 11 – Cultural Heritage issued on 16.03.2023, GCC are now content that the outstanding concerns relating to this matter has been resolved.	Agreed via email received on 22.06.2023 in response to the issue of draft DCO documentation.
5.		Air Quality		
6.		Noise and Vibration		

Matter Reference number	Parties Concerned	Matter which has been agreed	Position	Date and method of agreement
7.	Biodiversity			
8.	Road Drainage and the Water Environment			
9.	Landscape and Visual			
10.	Geology and Soils			
11.	Cultural Heritage			
11.6.	GCC	GCC Historic England and District Conservation staff should also be consulted regarding potential impacts on designated heritage assets and their settings.	It is agreed that assessments of significance are being conducted for the ES, and Historic England and local conservation officers will be consulted. Initial responses have already been received from Historic England.	09.09.2022 Email response to SoCG
11.5	GCC	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 with GCC to inform the ES and proposed Archaeological Management Plan (AMP) for mitigation, outside the link road. It is recommended that a scheme for evaluative investigation of the remainder of the red line area is agreed with the County Archaeology Service. Whilst it is understood that some areas may not be accessible, the ES 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	After reviewing the draft ES Chapter 11 – Cultural Heritage issued on 16.03.2023, GCC are now content that the outstanding concerns relating to this matter has been resolved.	Agreed via email received on 22.06.2023 in response to the issue of draft DCO documentation.

Matter Reference number	Parties Concerned	Matter which has been agreed	Position	Date and method of agreement
		<p>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.</p> <p>Additional survey work is proposed for areas outside of the link road corridor, where access allows, and will be included in the Environmental Statement (ES). The Archaeological Management Plan (AMP) will include approaches for areas inaccessible or otherwise unavailable in advance of the ES, to ensure the full consideration of the historic environment.</p>		
11.7	GCC	<p>The PEIR is already out of date, as although it mentions 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 ES as it should clarify the significance and extent of the archaeology there. Both the geophysical survey and trial trenching results will inform the assessments reported in the ES.</p> <p>Both the geophysical survey and trial trenching results will inform the assessments reported in the ES.</p>	<p>In September 2022, GCC stated that the answer is fine but the archaeological surveys necessary to inform the ES in areas other than the link road remained outstanding.</p> <p>After reviewing the draft ES Chapter 11 – Cultural Heritage issued on 16.03.2023, GCC are now content that the outstanding concerns relating to this matter has been resolved.</p>	Agreed via email received on 22.06.2023 in response to the issue of draft DCO documentation.
11.8	GCC	<p>Officers are 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 ES. Perhaps some site assessment would be beneficial combined with engineering geotechnical investigations.</p>	<p>In September 2022, GCC stated that the answer is fine but the archaeological surveys necessary to inform the ES in areas other than the link road remained outstanding.</p>	Agreed via email received on 22.06.2023 in response to the issue of draft DCO documentation.



Matter Reference number	Parties Concerned	Matter which has been agreed	Position	Date and method of agreement
		Results of the geotechnical investigations will inform the assessments for the ES. Geoarchaeological assessment undertaken for the trial trenching will also be used to inform the potential for early prehistoric remains. However, initial findings do not suggest a strong likelihood of such remains.	After reviewing the draft ES Chapter 11 – Cultural Heritage issued on 16.03.2023, GCC are now content that the outstanding concerns relating to this matter has been resolved.	
11.9	GCC	<p>There is a high probability of significant waterlogged remains being present in this area, which should be assessed in the ES and, in due course, arrangements for its investigation and recording should be agreed with the Historic England Science Advisor and included in the AMP.</p> <p>The potential for waterlogged deposits has been identified and evaluated during trial trenching activities. Results from the analysis will inform the ES and the Historic England science advisor will be approached during the development of the AMP where appropriate.</p>	<p>In September 2022, GCC stated the potential for waterlogged deposits needs to be assessed across the site not just in the area of the link road already subject to trial trenching therefore the matter remained outstanding.</p> <p>After reviewing the draft ES Chapter 11 – Cultural Heritage issued on 16.03.2023, GCC are now content that the outstanding concerns relating to this matter has been resolved.</p>	Agreed via email received on 22.06.2023 in response to the issue of draft DCO documentation.
11.10	GCC	<p>The PEIR 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, indicate 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 continuation of known Iron Age, Roman and early medieval activity.</p> <p>The results of the geophysical survey and trial trenching will inform the assessments undertaken for the ES.</p>	<p>In September 2022, GCC stated that the answer is fine but the archaeological surveys necessary to inform the ES in areas other than the link road remained outstanding.</p> <p>After reviewing the draft ES Chapter 11 – Cultural Heritage issued on 16.03.2023, GCC are now content that the outstanding concerns relating to this matter has been resolved.</p>	Agreed via email received on 22.06.2023 in response to the issue of draft DCO documentation.

Matter Reference number	Parties Concerned	Matter which has been agreed	Position	Date and method of agreement
12. Materials and Waste				
12.8	GCC	<p>A review of the recommended updated data sources highlighted above may also have an impact on the future presentation of the 'Baseline conditions' set out under section 12.6.</p> <p>Future baseline sections will incorporate most recent data from updated documents on landfill capacity and waste infrastructure.</p>	<p>The response provided is considered wholly reasonable and GCC M&amp;W Policy officers have no further comments to make at this time.</p>	<p>Agreed via email received on 22.06.2023 in response to the issue of draft DCO documentation.</p>
12.9	GCC	<p>In addition, within section 12.8 '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 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 MLP section 7 (Mineral safeguarding), pages 37 to 40 for further local policy information.</p> <p>Where the option to utilise the underlying mineral resources is proposed by the Principal Contractor, this will be recorded in the mitigations section of the ES.</p> <p>To clarify the applicant should provide sufficient, credible evidence early on to establish the significance of potential mineral resource sterilisation with the development. Should it be agreed that the issue is</p>	<p>GCC officers previously commented in relation to potential mitigation measures to prevent the unnecessary sterilisation of the underlying mineral resource. It is noted that there is now a broad level discussion within the Environmental Statement Chapter 12: Materials and Waste section 12.7 -12.8. This makes reference to the production of a Materials Management Plan (MMP) which will be produced under the CLAIRE Definition of Waste: Code of Practice (DoWCoP).</p> <p>Provided that there is the strong commitment to produce and adhere to the MMP, then there are no further M&amp;W Policy comments on the draft documents.</p>	<p>Agreed via email received on 22.06.2023 in response to the issue of draft DCO documentation.</p>

Matter Reference number	Parties Concerned	Matter which has been agreed	Position	Date and method of agreement
		<p>materially significant, then the applicant should bring forward proposed mitigation measures. This could include preparation of an 'on-site mineral recovery and use' strategy; or a 'mineral recovery and onward sale' strategy. In respect of the initial assessment stage, the applicant is strongly encouraged to acquire a sufficiently detailed and technical competent Mineral Resource Assessment. This will be the core evidence for determining whether mineral resource sterilisation is in fact a land-use planning matter that demands attention with this development.</p>		
13. Population and Human Health				
14. Climate				
14.5	GCC	<p>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.</p> <p>The traffic modelling assessment includes changes to vehicles as the UK moves towards Net Zero and the increase in Electric vehicles (EVs) 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 Preliminary PEIR when operating emissions are discussed.</p> <p>GCC queried that the target for Glos is 80% reduction of emissions from transport by 2030; is there a requirement for this to be taken account of?</p>	<p>After reviewing the draft ES Chapter 14 – Climate, issued on 16.03.2023, GCC are now content that the outstanding concerns relating to this matter has been resolved.</p>	<p>Agreed via email received on 22.06.2023 in response to the issue of draft DCO documentation.</p>

Matter Reference number	Parties Concerned	Matter which has been agreed	Position	Date and method of agreement
14.6	GCC	<p>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. Will there be advanced lines provided at traffic lights for cyclists to ensure priority at junctions otherwise the incentive to use the route is diminished?</p>	<p>Officers are content that point will be clarified in the 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.</p> <p>The scheme is providing separate segregated facilities and will not provide advanced stop lines. LTN 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</p>	<p>Agreed via email response received on 09.09.2022 to the issue of SoCG document.</p>
14.7	GCC	<p>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?</p> <p>We have not recommended any routine monitoring of dust generated at the construction stage. Given the largely rural surroundings for the M5 Junction 10 construction site we would not anticipate that construction dust monitoring would be necessary as standard high risk site mitigation measures are likely to be sufficient to control construction dust emissions. We will assess this at the next stage of environmental assessment and will propose mitigation measures to be included in the Environmental Management Plan (EMP) that is being drafted alongside the ES. Where particularly sensitive receptors such as food production plants or electronics factories or activities with a much higher than normal dust risk potential are identified, quantitative monitoring survey's may be recommended to ensure that</p>	<p>After reviewing the draft ES Chapter 14 – Climate, issued on 16.03.2023, GCC are now content that the outstanding concerns relating to this matter has been resolved.</p>	<p>Agreed via email response received on 22.06.2023 to the issue of draft DCO documentation.</p>

Matter Reference number	Parties Concerned	Matter which has been agreed	Position	Date and method of agreement
		the appropriate mitigation measures are effective. Where the local authority requires a monitoring survey, we can recommend a suitable approach		
15. Assessment of Cumulative Effects				
16. Engineering Design				
16.7	GCC	Will there be sufficient linkages from segregated routes to local networks?	Officers are content that 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 PRow network and the local highway network with controlled crossings provided at key locations (Withybridge Lane, the WCLR and at Uckington where there is a signal-controlled junction with The Green and Moat Lane). The segregated route ties-in at the scheme extents, ready for future connections by developers and GCC.	Agreed via email response received on 22.09.2022 to the issue of SoCG document.
16.8	GCC	How will segregated route outlined for the West Cheltenham Link Road be connected into Tewkesbury Road and Kingsditch, Hester's Way and Springbank?	It is agreed that this falls outside the scope of our scheme. The expectation is that the West Cheltenham Development will be taking this forward.	Agreed via email response received on 22.09.2022 to the issue of SoCG document.
17. Draft Development Consent Order				
18. Land				

Matter Reference number	Parties Concerned	Matter which has been agreed	Position	Date and method of agreement
19. Environmental Management Plan				
19.2	GCC	Reference to a Construction Environmental Management Plan (CEMP) at 7.6.19 and what ecological topics it should include is welcomed. An outline CEMP would be useful to have at the DCO 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 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.	It is agreed that an outline Construction Environmental Management Plan (CEMP) will be included as part of the DCO submission.	Agreed via email response received on 09.09.2022 to the issue of SoCG document.
20. Construction Traffic Management Plan				

## 5 Matters Outstanding

### 5.1 Principal matters outstanding

5.1.1 The principal matters outstanding between Applicant and Joint Councils are:

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### 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.

5.2.2 Where a matter relates to the position of one council only, or there are differences in the position between the councils, the matter is subdivided. In all other instances, the position relates to that of the Joint Councils.

Table 5-1 - Matters Outstanding

Matters Reference Number	Parties Concerned	Position of Interested Party	Applicant Response	Joint Council Comment	Date
1. Principle of Development					
1.1.	CBC / TBC	The Joint Councils welcome the proposed widening of the A4019 and 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 CBC's Connecting Cheltenham report	We note this comment. The 'Strategic Connections' section of Connecting Cheltenham strategy report states "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 & cycling facilities will provide good quality off-road connections. For cyclists, these are	Further to the Joint Councils PEIR response in paragraph 2.14.2, the applicants' comments are noted. The Joint Council's note and welcome the proposed changes 8 and 9 in the targeted consultation which includes future proofing bus provision. However, some further commentary on how this would enable modal shift to sustainable transport, and how it would	27.09.22

Matters Reference Number	Parties Concerned	Position of Interested Party	Applicant Response	Joint Council Comment	Date
		(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.	intended to encourage less-confident cyclists that are needed to deliver the aims of Connecting Cheltenham.	connect the strategic allocation in the Joint Core Strategy would be welcomed.	
1.3.	GCC	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 help to reduce CO2 emissions.	An active travel corridor is included as part of the design for the full extent of the Scheme.	The contents of the Statement of Common Ground (SoCG) is noted. The Highway Authority has reviewed the submitted SoCG and at this time we are satisfied that the salient points from our previous consultation response has been identified. At this stage there is still a considerable amount of additional information which is required, much of which will be informed by the Transport Assessment. The Highway Authority would welcome early discussions on this assessment document to ensure it captures all the relevant points.	09.09.2022  Awaiting Response
2. Consultation					



Matters Reference Number	Parties Concerned	Position of Interested Party	Applicant Response	Joint Council Comment	Date
3. Assessment of Alternatives					
3.1.	CBC / TBC	The Scheme alternatives and option selection process is outlined clearly in Chapter 3. However, the Joint Councils would expect to see further details on any environmental considerations that were included in the option selection process in the ES and how this influenced the outcome.	Further detail will be provided as part of the ES. The selection of options through the design process included consideration of the impacts to the environment.	This was raised in our comments in paragraph 2.2.4 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022
4. Environmental Impact Assessment Methodology					
4.1.	CBC / TBC	The Joint Councils would expect further details to be provided in the ES on the reasoning why visual receptors are scoped out in Table 9-8 as also noted by the Planning Inspectorate in Appendix 1.1.	A full review of potential receptors will be undertaken for the Landscape and Visual Impact Assessment (LVIA) and justification provided for those then scoped out from further assessment.	This was raised in our comments in paragraph 2.7.7 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022
4.2.	CBC / TBC	The Joint Councils note that the PEIR assessment does not include an assessment of the proposed lighting columns. The ES 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.	Lighting columns are mentioned within Chapter 2 of the Preliminary Environmental Information Report (PEIR) and will be included in the LVIA.	This was raised in our comments in paragraph 2.7.5 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022
4.3.	CBC / TBC	The Joint Councils acknowledge that the PEIR is a preliminary assessment and are generally	The Human Health element of the ES will be developed further, in accordance with LA 112. Design	This was raised in our comments in paragraph 2.11.2 of the PEIR	27.09.2022

Matters Reference Number	Parties Concerned	Position of Interested Party	Applicant Response	Joint Council Comment	Date
		satisfied with the approach undertaken. However, the Joint Councils recommend that the approach/assessment methodology for human health in the ES needs to be undertaken in accordance with DMRB LA112 guidance and consistently applied throughout the chapter, including determining the potential and residual effects of the Scheme.	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. Consideration will be given to potential measures that could address identified negative health outcomes.	response. The Joint Councils will review this information when submitted.	
4.4.	CBC / TBC	The population element of the chapter generally follows the required approach set out in DMRB LA112. However, the Joint Councils query some of the assessment approaches and gradings outlined in the PEIR. The Joint Councils note that consistency and clarity need to be provided in the ES 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 assessing residual effects.	The items referenced in the response form part of Design Manual for Roads and Bridges (DMRB) LA 104 (para. 3.9). They have already been considered within the outputs to date; however, they will be expressed more explicitly within the ES. The ES will also include consideration of the potential effects, mitigation and residual effects for the population element of the chapter (as per DMRB LA112), but this is not a requirement for human health. Notwithstanding this, further detail will be added to explain health outcomes and consideration will be given to potential measures that could address negative health outcomes.	This was raised in our comments in paragraph 2.11.8 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022
4.5.	CBC / TBC	The Joint Councils would expect that for both the human health and	The items referenced in the response form part of DMRB LA 104	This was raised in our comments in paragraph	27.09.2022

Matters Reference Number	Parties Concerned	Position of Interested Party	Applicant Response	Joint Council Comment	Date
		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).	(para. 3.9). They have already been considered within the outputs to date; however, they will be expressed more explicitly within the ES.	2.11.7 of the PEIR response. The Joint Councils will review this information when submitted.	
4.6.	CBC / TBC	The assessment approach to describing the impacts is adequate for this stage. However, the Joint Councils expect the methodology outlined in the PEIR (DMRB LA 107) to be followed in the ES 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'.	The methodology for the LVIA will follow that set out in the PEIR (Design Manual for Roads and Bridges LA 107) to identify the sensitivity, magnitude of impact and significance of effects for all receptors. Timescales assumed for mitigation and assessment will also be set out.	This was raised in our comments in paragraph 2.7.3 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022
4.7.	CBC / TBC	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 Scheme. If this is because there are none within the	Environmental permit data is available for the Scheme. If relevant items were missed from the PEIR they will be reviewed and included in the ES assessment.	This was raised in our comments in paragraph 2.8.6 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022

Matters Reference Number	Parties Concerned	Position of Interested Party	Applicant Response	Joint Council Comment	Date
		boundary, the Joint Councils would welcome this confirmation in the ES.			
4.8.	CBC / TBC	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.	This comment is noted. The transport assessment and traffic modelling will be provided as part of the DCO submission.	This was raised in our comments in paragraph 2.14.1 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022
4.10.	GCC	Whilst the submitted PEIR does not outline that the final ES will provide a chapter on Transport as a standalone chapter, it is crucial that this is provided in support of the DCO application. This should be supported by a comprehensive Transport Assessment (TA) which should inform the assessment within the ES.	The inclusion of a Transport chapter will be reviewed as part of the ES. A Transport Assessment (TA) is being prepared as part of the DCO submission.	See earlier Highway Development Management (HDM) comment at 1.3	09.09.2022
4.11.	GCC	The TA will need to include a comprehensive Walking, Cycling and Horse-Riding Assessment	A Walking, Cycling and Horse Riding Assessment has been prepared for the scheme and a Walking, Cycling and Horse Riding	See earlier Highway Development Management (HDM) comment at 1.3	09.09.2022 Awaiting response

Matters Reference Number	Parties Concerned	Position of Interested Party	Applicant Response	Joint Council Comment	Date
		which follows the guidance in GG142.	Assessment/Review will be prepared for Design Fix 3.		
4.12.	GCC	As outlined above, it is crucial that a full TA is provided as part of the 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 TA which picks up on these points	This comment is noted, and a full Transport Assessment will be prepared and submitted as part of the DCO application.	See earlier Highway Development Management (HDM) comment at 1.3	09.09.2022  Awaiting response
5. Air Quality					
5.1.	CBC / TBC	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 database has been issued since the assessment was undertaken (the assessment used the emission factors toolkit v10.1, but version 11 was issued in November 2021). However, the update does not result in changes to emission	The most recent air quality (AQ) tools will be adopted at commencement of the ES assessment work.	This was raised in our comments in paragraph 2.3.4 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022

Matters Reference Number	Parties Concerned	Position of Interested Party	Applicant Response	Joint Council Comment	Date
		factors for nitrogen dioxide (NO <sub>2</sub> ) and particulate matter PM <sub>10</sub> , which are the key pollutants included in the air quality assessment. The updates in EFT v11 are for carbon dioxide only.			
5.2.	CBC / TBC	Further to comments in section 2.3 Air Quality, 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 to reduce dangerous pollutant concentrations and reduce the risk of detrimental impact on health and wellbeing within the area.	The Air Quality (AQ) assessment is limited to modelling the proposed 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 (DEFRA) future year emission forecasts. Wider traffic measures incorporated within the Proposed Scheme will be described in the ES. We will acknowledge the Gloucestershire Air Quality and Health Strategy in the regional policy section in the AQ chapter of the ES.	This was raised in our comments in paragraph 2.14.3 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022
6. Noise and Vibration					
6.1.	CBC / TBC	The baseline noise surveys were undertaken in May/June of 2021 following COVID-19 lockdown restrictions, as it was considered to be representative of an almost	The validity of baseline noise survey data will be considered for the ES.	This was raised in our comments in paragraph 2.14.3 of the PEIR response. The Joint Councils will review this	27.09.2022

Matters Reference Number	Parties Concerned	Position of Interested Party	Applicant Response	Joint Council Comment	Date
		'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 since May/June of 2021 at the time of preparing the ES.		information when submitted. Clearly an assessment and the baseline need to be understood in the post-Covid restriction environment, when commuting and leisure travel is likely to have undergone change.	
6.2.	CBC / TBC	The PEIR 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 ES will include a full BS 5228-1:2009+A1:2014 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 for the ES 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 PEIR.	The construction assessment will be more detailed in the ES.	This was raised in our comments in paragraph 2.4.4 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022
6.3.	CBC / TBC	The Joint Councils would expect the ES to identify all properties that	These matters will be addressed in the ES.	This was raised in our comments in paragraph	27.09.2022

Matters Reference Number	Parties Concerned	Position of Interested Party	Applicant Response	Joint Council Comment	Date
		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.		2.4.5 of the PEIR response. The Joint Councils will review this information when submitted.	
7. Biodiversity					
7.1.	CBC / TBC	Chapter 2 of the PEIR 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 ES, including reference to Biodiversity Net Gain (BNG) and whether and how the Scheme is looking to achieve this.	Further detail will be provided as part of the ES including details of the assessment undertaken of the biodiversity net gain (BNG) achieved by the Scheme.	This was raised in our comments in paragraph 2.2.3 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022
7.2.	CBC / TBC	BNG is mentioned a few times in the PEIR (e.g. paragraphs 7.6.17 and 7.12.10). The text mentions net gain targets and ensuring BNG, but there is no explanation within the Biodiversity chapter about whether the project is committing to achieving BNG, or what the intended target is. The Joint Councils would expect this to be clarified, either in the ES or elsewhere. It is also noted that a biodiversity BNG using metric 3.0 is listed as part of the next steps and it is expected that this would be submitted with the ES (as stated in paragraph 7.12.10). The Joint	The Scheme has an objective of achieving a net gain in biodiversity. We have an aspiration of a 10% net gain in biodiversity (including for terrestrial habitats, hedgerows, and rivers and streams). Based on the Design Fix 2 design, it is considered that this is achievable within the current scheme boundary. This will be clarified in the ES for DF3.	This was raised in our comments in paragraph 2.5.3 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022



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		Councils preference is for BNG to be achieved on site, as an integral component of the Scheme. If this cannot 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.			
7.3.	CBC / TBC	The methodology of assessment is in line with DMRB 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 ES, taking into account any additional survey data collected and any changes to the Scheme.	These matters will be addressed in the ES.	This was raised in our comments in paragraph 2.5.4 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022
7.4.	CBC / TBC	Detailed terrestrial invertebrate surveys have not been carried out, but no explicit explanation for excluding them has been provided in the PEIR. Paragraph 7.5.102 states that it is considered that priority assemblages of terrestrial invertebrates are unlikely, based on the habitat types. The Joint Councils expect the ES to provide 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	This was raised in our comments in paragraph 2.5.6 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022

Matters Reference Number	Parties Concerned	Position of Interested Party	Applicant Response	Joint Council Comment	Date
		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.	assessment because none of the traditional orchards will be affected by the Scheme. This detail will be included within the ES.		
7.5.	CBC / TBC	The bat survey report (Appendix 7.3) includes data from 2019 and 2020 only. It is noted from the PEIR chapter 7 that further bat survey work continued in 2021 and analysis of data is ongoing and will be reported on within the ES. A footnote to paragraph 7.3.30 explains that advanced license bat surveys were proposed for Bechstein's bat in 2021, but were subject to limitations and may, or may not, be carried out in 2022. If these surveys are not carried out, the ES should set out an explanation about why these proposed surveys have been scoped out.	These matters will be addressed in the ES.	This was raised in our comments in paragraph 2.5.7 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022
7.6.	CBC / TBC	Paragraph 7.11.6 in the Biodiversity chapter appropriately considers the age of 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 ES and determine whether any conditions have changed. This approach is	These matters will be addressed in the ES.	This was raised in our comments in paragraph 2.5.10 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022

Matters Reference Number	Parties Concerned	Position of Interested Party	Applicant Response	Joint Council Comment	Date
		acceptable. It is expected that the age of all other survey data will be considered, and any limitations set out in the ES, along with any assumptions that have been made in the assessment in relation to this.			
7.7.	CBC / TBC	Paragraphs 7.6.27 to 7.6.34 and Table 7-8 in the Biodiversity chapter set out habitat loss and creation. This includes terrestrial (ha and linear m) and aquatic habitats. Paragraph 7.6.28 states there is a permanent loss of 69ha, and a temporary loss of 32ha. Paragraph 7.6.32 states that habitat creation will offset the effects of habitat loss and fragmentation, with a potential minor beneficial effect on habitats stated in 7.6.34 during operation. The information in the PEIR 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 ES should consider the best way to present the overall mitigation plan and habitat loss/creation in relation to terrestrial and aquatic habitats. If there is an overall net loss of terrestrial or aquatic habitat, the ES	As explained in the paragraphs referenced, of 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 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 will be addressed fully in the ES and consideration will be given to how to present this information in the best way.	This was raised in our comments in paragraph 2.5.12 of the PEIR response. The Joint Councils will review this information when submitted. We welcome the additional areas for ecological enhancements outlined in the August 2022 targeted consultation	27.09.2022

Matters Reference Number	Parties Concerned	Position of Interested Party	Applicant Response	Joint Council Comment	Date
		will need to include further explanation/evidence about how the habitat creation proposals offset the effects of this loss.			
7.8.	CBC / TBC	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 ES (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 explain their value for biodiversity.	This has been noted and will be addressed in the ES and accompanying documents.	This was raised in our comments in paragraph 2.5.13 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022
7.9.	CBC / TBC	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 in	The 2021 survey data has now been analysed, and this has fed into further discussions on this matter. We have concluded that additional mitigation measures are required, as alluded to in paragraph 7.8.2. These additional measures (an additional bat mitigation building and an underpass) are currently under consideration. Further detail will be included in the ES.	This was raised in our comments in paragraph 2.5.14 of the PEIR response. The Joint Councils will review this information when submitted. We welcome the additional areas for ecological enhancements outlined in the August 2022 targeted consultation, specifically design changes 2 & 3 – bat underpass, and ecological enhancement.	27.09.2022

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		7.8.2, 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 the significance of effects would be welcomed.			
7.10.	GCC	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 at 7.6.10 of the PEIR seem correct. It is acknowledged that more survey work in the coming months will be carried out to fully inform the ES for the DCO process. For this reason, final assessments, particularly for bats, 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 7-12 (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	These matters will be addressed in the ES.	Agreed  Confirmation required from GCC to move to agreed or delete this matter.	09.09.2022

Matters Reference Number	Parties Concerned	Position of Interested Party	Applicant Response	Joint Council Comment	Date
		late changes in scheme design nearer to the DCO stage.			
7.11.	GCC	The Environment Bill is referenced in the biodiversity chapter of the PEIR at 7.2.11 and 7.2.12. This needs updating to the Environment Act with the relevant aspects being Sections 99 (Biodiversity Net Gain (BNG) for NSIP) and 102 (biodiversity duty). It is pleasing to see reference to the Gloucestershire Highways Biodiversity Guidance, the fledgling Nature Recovery Network (NRN), and the county Tree Strategy at 7.2 of the PEIR. There is brief mention at the end of this part of the biodiversity chapter to the Gloucestershire Local Nature Partnership (GLNP). Usefully reference should also be made in the ES to the Partnership's current strategy "Growing Natural Success 2021-2024" and that GCC is a key member.	These matters will be addressed in the ES.	Agreed  Confirmation required from GCC to move to agreed or delete this matter.	09.09.2022
7.12.	GCC	The old Gloucestershire Biodiversity Action Plan (BAP) shouldn't form a titled section in the ES but instead a section on the GLNP should briefly reference the old BAP. This section should also refer to the new NRN and work currently underway to produce a	These matters will be addressed in the ES.	Agreed  Confirmation required from GCC to move to agreed or delete this matter.	09.09.2022

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		mandatory Local Nature Recovery Strategy (LNRS) for Gloucestershire (which GCC is likely to be named the responsible body to compile and publish by the end of 2023). In Appendix 7.1 at 1.2.7 it would be more accurate to end the first sentence with ‘...and is using these to review the suite of Strategic Nature Areas (SNAs) to feed into a new LNRS for the county.’			
7.13.	GCC	The objective to aim for a level of Biodiversity Net Gain (BNG) 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 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 ES as will a response to the calculation made. Areas calculated should, in our view, refer to real	An initial biodiversity net gain assessment using Metric 3.0 indicates that 10% net gain is achievable within the Scheme boundary, based on the DF2 design. However, some amendments to the landscape design are required to satisfy trading rules. This is being discussed, and the metric will be re-run using the DF3 design and taking into account landscape amendments.	Agreed  Confirmation required from GCC to move to agreed or delete this matter.	09.09.2022

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		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 away from the scheme area.			
7.14.	GCC	Table 7-10 (Watercourse construction impact pathways) and Table 7-11 (Watercourse operational impact pathways) are very useful and something like these should be included in the ES. 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 (7.7.47 to 7.7.60).	The tables referenced will be within the ES, with any necessary updates made.	Agreed  Confirmation required from GCC to move to agreed or delete this matter.	09.09.2022
7.15.	GCC	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	Species such as deer and wild boar would not usually be considered within the ES as they are not protected or priority species. However, following this comment,	Agreed	09.09.2022



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		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 ES would be wise. It is noted this matter is addressed in the PEIR 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.	consideration will be given to the most appropriate place to discuss this matter within the ES. Barn owl surveys are being undertaken this year, so further information with regard to this species will be included in the ES	Confirmation required from GCC to move to agreed or delete this matter.	
7.16.	GCC	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 ES of the use of existing watercourses and associated habitat is unlikely to be	These matters will be addressed in the ES. As an update, badger and otter fencing has now been included in the design along the Link Road, but further consideration will be given to these comments.	Agreed  Confirmation required from GCC to move to agreed or delete this matter.	09.09.2022

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		<p>sufficient. Mitigation may require further tweaks such as designs of structures (bridges/culverts) or landscaping (corridors that would be preferentially used by otters) or special fencing (7.7.26) 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?).</p>			
7.17.	GCC	<p>Great Crested Newt District Level Licensing (GCN DLL) should be employed if the cost is similar or less than traditional licencing. This is because GCC promotes the use of this scheme to others, and it helps to provide new habitats for GCNs in a strategic way across the county. The most important part of DLL is that it results in fewer delays to works especially if designs or proposed operations or timetables change. We are aware that GCC/Atkins are in contact with Naturespace who can advise further. They will also be able to confirm how DLL may be employed, i.e. because there is a link with consenting of some aspect</p>	<p>It is noted that we are in support of the District Level Licensing (DLL) scheme for Great Crested Newts (GCN).</p>	<p>Agreed</p> <p>Confirmation required from GCC to move to agreed or delete this matter.</p>	09.09.2022

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		of the highways scheme such as from a Local Planning Authority or other decision maker.			
7.18.	GCC	We note a Habitats Regulations Assessment (HRA) screening report is being prepared with input from Natural England and the main concern is impact on migratory fish population connected with Severn Estuary. It would be good to see early sight of a confirmed or near final version of an HRA document for the scheme.	The Habitats Regulations Assessment (HRA) was submitted along with the Preliminary Environmental Information Report (PEIR) for comment. Please see Appendix 7.13	Agreed  Confirmation required from GCC to move to agreed or delete this matter.	09.09.2022
7.19.	GCC	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?	Information on proposals to avoid fragmentation of habitats and therefore overcome barriers to wildlife movement are presented in the Biodiversity chapter of the ES.	Agreed  Confirmation required from GCC to move to agreed or delete this matter.	09.09.2022
<b>8. Road Drainage and the Water Environment</b>					
8.1.	CBC / TBC	The Joint Councils agree that the PEIR provides an appropriate assessment of the expected impacts on 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	Water quality data (for example from the Environment Agency's online water quality data archive) is not usually included in the ES. However, the ES will include a baseline water quality assessment using the National Highways (formerly Highways England) Water Risk Assessment Tool (HEWRAT), which will provide predicted	This was raised in our comments in paragraph 2.6.2 of the PEIR response. The Joint Councils will review this information when submitted.  However, it is common to summarise existing EA water quality data as part of the baseline assessment	27.09.2022

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		Framework Directive (WFD) Status is provided for WFD water bodies. A summary of water quality data from available sources and the ground investigation would be expected to be provided in the ES stage (e.g., Environment Agency monitoring data).	dissolved copper and dissolved zinc concentrations within the highway runoff. One of the inputs to the HEWRAT is the ambient background dissolved copper concentration of the watercourse receiving the highway runoff, so this data will also be reported in the ES.	and it is recommended to review this data as a summary of baseline conditions within the ES for a wider range of determinants than those included within HEWRAT.	
8.2.	CBC / TBC	Section 8.6 in the PEIR outlines that a preliminary Highways Agency Water Risk Assessment Tool (HAWRAT) assessment has been 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.	This will be included in the updated assessment using the HEWRAT.	This was raised in our comments in paragraph 2.6.3 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022
8.3.	CBC / TBC	The Joint Councils would expect the surface water quality assessment to include impacts from salt and gritting activities within the ES.	The DMRB LA 113 does not include any specific guidance for assessing the impact from salt and gritting on the water environment. Reference can be made in the ES to the potential impact salt and gritting can have on the water environment by including the following statement, but a specific assessment will not be undertaken:	This was raised in our comments in paragraph 2.6.4 of the PEIR response. The Joint Councils will review this information when submitted however, it should also be noted that any impacts should consider temporal and spatial extent of impact.	27.09.2022

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			Other than heavy metals and nutrients, the significant dissolved constituent of highway runoff in the UK is sodium chloride (NaCl), applied as de-icing salt during the 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.		
8.4.	CBC / TBC	Section 8.11 in the PEIR 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).	The Low Flows Estimation Tool will be used in the updated assessment.	This was raised in our comments in paragraph 2.6.5 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022
8.5.	CBC / TBC	Joint Councils note the use of the conservative assumption of using $0.001m^3/s$ results in a requirement to consider the receptor as soak away 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	Following the Low Flows Estimation, none of the receptors have flows equal to or less than $0.001m^3/s$ . Therefore, no requirement for a groundwater assessment.	This was raised in our comments in paragraph 2.6.6 of the PEIR response. Following the further clarification, we have no further comments to make.	27.09.2022

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		0.001m3/s is retained, a judgement should be made regarding the requirement for a groundwater assessment.			
8.6.	CBC / TBC	The Joint Councils note that at the time of writing of the PEIR, site-specific groundwater conditions were not available such that an informed assessment of impact to groundwater levels and flow could be completed. It is expected that a detailed impact assessment will be included in the ES.	A detailed impact assessment will be included at the next stage of assessment and site-specific ground investigation data will be included to support that.	This was raised in our comments in paragraph 2.6.7 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022
8.7.	CBC / TBC	Regarding the potential impacts on flood risk, the Joint Councils note in paragraph 8.6.2 of the PEIR 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.  Paragraph 8.6.30 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, businesses) and what the extent is of changes to flood depths/area of	The effects of changing discharge outfall locations has been considered as part of the design development.  Without mitigation the Scheme would impact on the farmland east of the 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 (FRA) and PEIR and include data on the impacts should no mitigation be implemented (flood culverts, bridge, flood storage and compensatory floodplain).	This was raised in our comments in paragraph 2.6.9 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022

Matters Reference Number	Parties Concerned	Position of Interested Party	Applicant Response	Joint Council Comment	Date
		<p>these receptors within the ES.</p> <p>9/3/22 - further clarification provided by consultee - Without mitigation the scheme will displace flood water and impact on its "neighbours". Which neighbours are these (farmland, individual dwellings, businesses?) and what is the extent of changes to flood depths / area of these receptors?</p>			
8.8.	CBC / TBC	<p>Paragraph 8.6.31 in the PEIR 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.</p> <p>9/3/22 - further clarification provide by consultee - Compensatory storage - volumes and locations identified but 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? Can it be stated that compensatory storage areas will be fully free draining and discharge all temporarily stored water without</p>	<p>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 reprovision of floodplain on a level for level basis as the Junction does not displace water on</p>	<p>This was raised in our comments in paragraph 2.6.10 of the PEIR response. The Joint Councils support this change and that this future assessment and consultation with the Environment Agency will determine the final extent and design of the mitigation required.</p>	27.09.2022

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		<p>notable residual standing water? Noted that Appendix 8.1 FRA states level for level not required in agreement with EA so perhaps this can be signposted in the chapter text.</p>	<p>a level for level basis - it is hydraulically disconnected from the River Chelt. We can signpost that level for level is not required in agreement with the Environmental Assessment (EA) as already stated in the FRA.</p> <p>The compensatory floodplain by the 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.</p>		
8.9.	CBC / TBC	<p>The PEIR recognises the necessity of a Right to Flood agreement outlined in section 8.7. 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.</p>	<p>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. this is described in Para 8.7.15. The temporary construction phase needs to be understood by the contractor to minimize risk during the build stage. The Buildability Report provides some further information on how this Scheme might be constructed.</p>	<p>This was raised in our comments in paragraph 2.6.11 of the PEIR response. The Joint Councils support this change.</p>	27.09.2022



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8.10.	CBC / TBC	<p>Section 8.8 outlines the residual impacts on flood risk. The Joint Councils have noted some inconsistency between table 8.12 and paragraph text in the assessment and so would expect clarification of this assessment.</p> <p>9/3/22 - further clarification provided by consultee - Paragraph 8.8.19 states that the worst-case adverse residual impact on flood receptors is Negligible resulting in Slight or Neutral significance. However, Table 8-12 shows Moderate Adverse significance for Elmstone Business Park. How is this reconciled?</p>	<p>The PEIR 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 will support the Flood Risk Assessment (FRA) and ES and the assertion that the worst-case adverse residual magnitude of impact on all off-site built flood receptors during operation is Negligible, resulting in a Slight or Neutral significance of effect. The intention is that impacts on undeveloped land classified as being moderate or larger will be addressed with through Right to Flood agreements.</p>	<p>This was raised in our comments in paragraph 2.6.12 of the PEIR response. The Joint Councils will review this information when submitted.</p>	27.09.2022
8.11.	CBC / TBC	<p>The Joint Councils acknowledge this is a preliminary FRA and would expect more details included in the updated FRA 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)</p>	<p>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 FRA and PEIR and incorporate the July 2021 climate change guidance, as well as more information on the displacement of</p>	<p>This was raised in our comments in paragraph 2.6.14 of the PEIR response. The Joint Councils will review this information when submitted.</p>	27.09.2022

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		climate change allowances applied to the modelling.	floodwater and compensatory storage/floodplain. Such information will be included in the next version of the FRA report.		
8.12.	CBC / TBC	The Joint Councils would also 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.	The project has engaged an All Reservoir Panel Engineer to advise the preliminary design with regards to the large flood storage area and raising of road embankments. It is believed that the slip road and A4019 improvements at Junction 10 do come under the remit of the Reservoirs Act 1975.	This was raised in our comments in paragraph 2.6.14 of the PEIR response. The applicant's response is noted, and we have no further comments to make	27.09.2022
8.13.	CBC / TBC	Table 8.1 in the PEIR 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 WFD as one of the EU Directives referred to is the WFD and is therefore, key to permitting.	These matters will be addressed in the ES, where a connection will be made between the Environmental Permitting Regulations (2016) and Water Framework Directive (WFD) as one of the EU Directives.	This was raised in our comments in paragraph 2.6.17 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022
8.14.	CBC / TBC	The PEIR 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 EIA as their location/extent is not finalised. The Joint Councils would expect that these are assessed along with the necessary agricultural surveys/sampling in	The impacts on attenuation basins, flood compensation areas and temporary land take contained within the final design fix will be considered in the ES.	This was raised in our comments in paragraph 2.8.4 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022

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		these areas and that the ES will include this data.			
8.15.	CBC / TBC	The Joint Councils would expect to see further details of the extent of surface water run-off to be contaminated (e.g., with hydrocarbons) and how will this be mitigated in the ES. Natural storage solutions in terms of swales would be preferred and welcomed, over and above hard landscaped proposals.	As stated in the guidance (LA 113) the HEWRAT is used to predict whether the risk to the water environment from road runoff is acceptable. The concentrations of soluble pollutants and sediment bound pollutants (which includes hydrocarbons) is calculated within the HEWRAT and the results presented in the ES 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 will provide information on the proposed mitigation, and this will be summarised in the ES.	This was raised in our comments in paragraph 2.8.5 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022
8.16.	CBC / TBC	The Joint Councils would expect to see more details regarding the reasons for screening out water bodies identified in Table 3.1 in the update to the WFD assessment.	Text that was included as a footnote to the table will be included within the main text. This is: These water bodies fall within the area of the red line boundary where	This was raised in our comments in paragraph 2.6.19 of The Joint Councils will review this information when submitted. We would	27.09.2022

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			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.	rely on the response of the EA, who are the appropriate authority on this matter	
8.17.	GCC	The Road Drainage and the Water Environment chapter (Chapter 8) of the PEIR 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 elsewhere if appropriate mitigating steps are not taken.	Flood risk both to and from the Scheme is described in the Flood Risk Assessment (FRA) report, along with the embedded mitigation that controls that impact.	Agreed  Confirmation required from GCC to move to agreed or delete this matter.	09.09.2022
9. Landscape and Visual					
9.1.	CBC / TBC	The Joint Councils note on the landscape design plans (Appendix 2.2) that no tree planting along the southern verge of the 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	There are 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 design was to retain this openness. Planting around the attenuation basin close to the fire station would restrict close proximity views for residential properties. However, we have noted these concerns and further consideration will be given to the landscape design here.	This was raised in our comments in paragraph 2.7.6 of the PEIR response. The Joint Councils will review this information when submitted. We would note this scheme provides an opportunity to improve the existing landscaping in the area and provide further mitigation, which is not only beneficial for the amenity of the area but could help	27.09.2022

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		PEIR suggests effects will not be significant long term, however, this assumes that successful tree planting would be provided and maintained along this southern verge.		improve air quality and biodiversity further.	
9.2.	CBC / TBC	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.	The current design requires the majority of the trees to be removed. We are happy to discuss this with you and any mitigation measures.	This was raised in our comments in paragraph 2.5.9 of the PEIR response. The applicant's response is noted. We would welcome discussion over appropriate mitigation measures, with our aspiration being to provide an improvement to the landscaping framework of the area.	27.09.2022
9.3.	CBC / TBC	Paragraph 7.12.10 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 upon. This plan should be submitted with the ES as part of the DCO application.	This will be considered within the draft Construction Environmental Management Plan (CEMP) which will form part of the DCO application.	This was raised in our comments in paragraph 2.5.16 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022
9.4.	CBC / TBC	The Joint Councils would expect the ES to assess and determine the benefit and/or efficiency of mitigation options. The Joint Councils would also expect the ES	The mitigation section of the Noise and Vibration chapter of the ES will include further detail.	This was raised in our comments in paragraph 2.4.7 of the PEIR response. The Joint Councils will	27.09.2022

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		to include non-acoustic environmental factors (such as material selection, visual impacts, spatial constraints) that have been considered for the design of noise barriers and/or noise bunds.		review this information when submitted.	
9.5.	CBC / TBC	It is noted in the Landscape and visual chapter of the PEIR 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 ES. The Biodiversity ES 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.	We can confirm that the M5 J10 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 ES chapter will refer to the results of the arboricultural survey to confirm whether any additional ancient or veteran trees are recorded within the study area.	This was raised in our comments in paragraph 2.5.8 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022
9.6.	GCC	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 ES. Enriched	Further detail will be included in the ES.	Agreed Confirmation required from GCC to move to agreed or delete this matter.	09.09.2022

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		topsoil should not be imported but on-site supplies moved to areas that will mainly 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). This appears to be the case with a reference at 7.6.17.			
9.7.	GCC	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 GCC and Ringway over the coming years so it would be useful if some investigation into what might be possible within the scope of these highway improvements is carried out.	We note this comment and are investigating options for inclusion in our design.	Agreed  Confirmation required from GCC to move to agreed or delete this matter.	09.09.2022
9.8.	GCC	Lighting impact on potential bat and other nocturnal wildlife needs to be	Design of lighting proposals has considered the environmental and	Agreed	09.09.2022

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		<p>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 ES showing predicted lux levels as contours on a drawing and/or 3D indicative visualisation diagrams. Generally, we should be aiming at not much 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 DCO 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</p>	<p>ecological impacts and as noted, the colour temperature output has been tuned to be as compatible as reasonably practicable. Additionally, luminaires have been selected which have zero upward light when mounted at the required tilt angles. Once highway alignments have been finalised, we will prepare a plot of Isolux contours which can be shared and used to identify any areas of particular concern.</p>	<p>Confirmation required from GCC to move to agreed or delete this matter.</p>	



Matters Reference Number	Parties Concerned	Position of Interested Party	Applicant Response	Joint Council Comment	Date
		exceed 3,000K in colour 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 at 7.6.20 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.			
10. Geology and Soils					
10.1.	GCC	Paragraph 12.3.5 – the proposed review of the ‘South West Aggregates Working Party Annual Report: 2018’ needs updating to: ‘South West Aggregates Working Party - Annual Report 2020’	The most up to date version of documents will be reviewed for the ES.	The response provided is considered wholly reasonable and GCC M&W Policy officers have no further comments to make at this time.	09.09.2022
11. Cultural Heritage					
11.1.	CBC/TBC	It is noted that consultation with the Gloucestershire Council archaeological advisor is ongoing and has informed the production of the assessment within the PEIR, including surveys undertaken to date. This is welcomed by the Joint Councils and the continuation of this consultation is recommended.	Consultation with the county Archaeological Advisor is ongoing. Consultation with Tewkesbury Borough Council (TBC) and Cheltenham Borough Council (CBC) Conservation Officers will be included in the Environmental Statement (ES) assessment.	This was raised in our comments in paragraph 2.9.7 of the PEIR response. The Joint Councils will review this information when submitted. We welcome the collaboration between officers	27.09.2022

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		<p>Consultation with the Conservation Officer sat TBC and CBC is also recommended to inform proposals for mitigation of temporary and permanent impacts on the setting of Listed Buildings within the Boroughs.</p>			
11.2.	CBC / TBC	<p>The Joint Councils welcome the proposed approach of developing a robust programme of archaeological investigation and recording following an AMP prepared in consultation with the local authority's archaeological advisor, to mitigate the impacts on buried archaeological remains. The awareness that any such AMP should also take into account cumulative effects resulting from adjacent developments impacting on wider archaeological remains, such as the housing allocation site at Fiddlers Green (OUA07) and at North West Cheltenham as part of the Tewkesbury Borough JCS (reported within paragraphs 11.10.3 and 11.10.4 of the PEIR), 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</p>	<p>Cumulative impacts on cultural heritage will be addressed in the ES and will be considered in the development of the ES.</p>	<p>This was raised in our comments in paragraph 2.9.6 of the PEIR response. The Joint Councils will review this information when submitted.</p>	27.09.2022

Matters Reference Number	Parties Concerned	Position of Interested Party	Applicant Response	Joint Council Comment	Date
		<p>account in developing the proposed AMP. The Joint Councils also agree with the proposals for permanent impacts on the setting of heritage assets to be mitigated through design and landscaping and temporary impacts on the setting of heritage assets during construction to be mitigated through the CEMP.</p>			
11.3.	CBC / TBC	<p>The Joint Councils note that there are no heritage assets located within Cheltenham Borough that would be affected by the proposed works. 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 ES. It is noted that a geophysical survey has informed the assessment within the PEIR and there is a recommendation for an Archaeological Management Plan (AMP) to be developed. The PEIR states that the AMP will be developed in consultation with the Gloucestershire Council archaeological advisor and Historic England and the Joint Councils welcome this approach.</p>	<p>These matters will be addressed in the ES.</p>	<p>This was raised in our comments in paragraph 2.9.4 of the PEIR response. The Joint Councils will review this information when submitted.</p>	27.09.2022

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11.4.	CBC / TBC	The Joint Councils note that the assessment of landscape character does not include any reference to the tranquillity of the landscape and suggest it this should be undertaken and included in the ES to understand the current situation and how the Scheme may affect this.	Tranquillity of the area will be considered within the landscape character section of the LVIA.	This was raised in our comments in paragraph 2.7.4 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022
<b>12. Materials and Waste</b>					
12.1.	CBC / TBC	The PEIR provides no mention of historical GI 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 ES as to whether the planning portal was reviewed to identify any GI reports on, or in close 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.	It is acknowledged that historical ground investigation (GI) data may be available through the planning portal. A search of this information will be undertaken, and the details reported in the ES, together with the findings of the Scheme specific ground investigation.  We will also be speaking with the relevant Environmental Health Officers.	This was raised in our comments in paragraph 2.8.7 of the PEIR response. The Joint Councils will review this information when submitted. We welcome discussions with our officers.	27.09.2022
12.2.	CBC / TBC	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 ES. This is the	We will include the EU List of Waste and its transposition into UK law within the planning policy section of the ES.	This was raised in our comments in paragraph 2.10.3 of the PEIR response. The Joint	27.09.2022

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		key document that implements waste coding and also takes precedence in some cases on hazardous waste thresholds and therefore, is recommended to be included.		Councils will review this information when submitted.	
12.3.	CBC / TBC	Section 12.7.2 in the PEIR outlines an assumption the waste will all be primarily aggregate. 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 ES.	Section 12.7 is the Potential Impacts and as such looks at the worst case scenario of the project before mitigation, hence it refers to materials only being from primary sources. Section 12.9 refers to the actual project impacts, after mitigation, highlighting that at minimum 22% will be from recycled sources. The principal contractor would be expected to source as much as possible from recycled aggregate.	This was raised in our comments in paragraph 2.10.4 of the PEIR response. The applicant's response is noted, and this point is now agreed.	27.09.2022
12.4.	CBC / TBC	The Joint Councils note in paragraph 12.7.6 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.	This section of the Materials and Waste chapter will be amended to show waste will be generated and managed, not disposed, to follow the waste hierarchy.	This was raised in our comments in paragraph 2.10.5 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022
12.5.	CBC / TBC	The Joint Councils welcome the mitigation measures outlined in section 12.8 of the PEIR however, further details and measures should be included in the ES. For example, paragraph 12.8.6 could	Further and more detailed mitigation will be included in the ES, once the design is more developed and a principal contractor is appointed to	This was raised in our comments in paragraph 2.10.6 of the PEIR response. The Joint	27.09.2022

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		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.	advise on specific mitigation measures.	Councils will review this information when submitted.	
12.6.	GCC	Paragraph 12.3.5 – the proposed review of the ‘Environment Agency, Waste Data Interrogator, 2019’ needs updating to: ‘2020 Waste Data Interrogator’;	The most up to date version of documents will be reviewed for the ES.	The response provided is considered wholly reasonable and GCC M&W Policy officers have no further comments to make at this time.	09.09.2022
12.7.	GCC	Paragraph 12.3.5 – the proposed review of the ‘Environment Agency, Remaining Landfill Capacity, 2020’ needs updating to: ‘Remaining Landfill Capacity 2021’	The most up to date version of documents will be reviewed for the ES.	The response provided is considered wholly reasonable and GCC M&W Policy officers have no further comments to make at this time.	09.09.2022
<b>13. Population and Human Health</b>					
13.1.	CBC / TBC	The Joint Councils note that Chapter 4 of the PEIR refers to a Health Impact Assessment and Equalities Impact Assessment	A separate Equality Impact Assessment (EqIA) is being produced for the Scheme and will be referred to in the Population and	This was raised in our comments in paragraph 2.11.6 of the PEIR response. The Joint	27.09.2022

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		<p>which will be prepared separately and, as such, it is expected that the population and human health ES chapter will need to both reflect and inform these reports.</p>	<p>Human Health (P&amp;HH) chapter. The requirement to produce a separate Health Impact Assessment (HIA) has been reviewed and it has been concluded that such a document is not required for the Scheme.</p> <p>Instead of a separate HIA, the human health section of the P&amp;HH chapter will be expanded to:</p> <ul style="list-style-type: none"> <li>describe health characteristics in greater detail, including consideration of mental health data;</li> <li>use data analysis to identify and include relevant vulnerable groups within the health baseline; and</li> <li>strengthen approach to consultation and engagement process and outcomes.</li> </ul> <p>Summary tables will be included to provide greater clarity in expressing the outcomes of the assessment, and to better connect health outcomes with impacts</p>	<p>Councils will review this information when submitted.</p>	
13.2.	CBC / TBC	<p>The Joint Councils suggest that the ES considers 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 PEIR, such</p>	<p>The baseline data will be verified and updated as appropriate within the ES. This will include 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 P&amp;HH chapter</p>	<p>This was raised in our comments in paragraph 2.11.3 of the PEIR response. The applicant's response is noted, The Joint Councils will review this information when submitted.</p>	27.09.2022

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		as 'access to private property and housing', 'active travel', 'work and training', and 'landscape and visual amenity', noting that physical impacts/ effects from the Scheme will also potentially affect health.	will be expanded, allowing (within its methodology) for the fuller consideration of health priorities and wider health determinants, as expressed within the Joint Strategic Needs Assessment (JSNA) (due to the objectives led approach to HIA).		
13.3.	CBC / TBC	The Joint Councils would also expect the ES to consider the distribution of effects within the 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 to the baseline conditions and any effects arising from the Scheme.	The Design Manual for Roads and Bridges LA 112 methodology will be followed in further developing the baseline information for the ES. The baseline data will be verified and updated as appropriate within the ES. This will include review of availability of Census 2021 data; ward boundaries and proportionate review of health statistics. It should also be noted that a separate EqIA will be produced, and that the human health section of the P&HH chapter will be 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 (JSNA) (due to the objectives led approach to HIA).	This was raised in our comments in paragraph 2.11.4 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022



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13.4.	CBC / TBC	The Joint Councils would also expect the ES 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.	The Human Health element of the ES will be 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 - no methodology is provided for this aspect of the chapter. Further detail will be added to explain health outcomes and consideration will be given to potential measures that could address identified negative health outcomes.	This was raised in our comments in paragraph 2.11.5 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022
13.5.	GCC	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 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.	Bus priority measures are being considered as we develop and refine our design. More information will be provided as we have more detail.	See earlier Highway Development Management (HDM) comment at 1.3	09.09.2022  Awaiting response
13.6.	GCC	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	Bus priority measures are being considered as we develop and refine our design. More information will be provided as we have more detail. The project management	See earlier Highway Development Management (HDM) comment at 1.3	09.09.2022  Awaiting response

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		part of Design Fix 3. Given there is a clear policy requirement to consider non-car modes, and that GCC has declared a Climate Emergency, the Scheme should be considering bus priority measures. We would welcome discussions between Stagecoach, the applicant and the Highway Authority (HA) to determine the requirements for bus priority as part of the Scheme. Again, it is expected that details and justification of this would be provided as the Scheme moves towards Design Fix 3.	team are in regular discussions with Stagecoach and the development control team at GCC to ensure the design meets as much of the requirements for retaining current services and future proposals as possible.		
13.7.	GCC	Given the deprivation and health profile of these communities, 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.	Noted. The Human Health element of the ES will be developed further, in accordance with LA 112. DMRB LA112 does not require significance to be assigned to human health outcomes - no methodology is provided for this aspect of the chapter. Detail will be added to explain health outcomes and consideration will be given to potential measures that could address identified negative health outcomes. Separately, an HIA is to be undertaken and findings of that process will be used as a reference point for the ES.	We would like to see this change to the sentence below "Detail will be added to explain health outcomes and consideration will be given to potential measures that could address identified negative, and amplify potential positive, health outcomes.	09.09.2022

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13.8.	GCC	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 study these potential effects during the next stage of the EIA and to undertake mitigations along sensitive areas.	Noted. The Human Health element of the ES will be developed further, in accordance with LA 112. DMRB LA112 does not require significance to be assigned to human health outcomes - no methodology is provided for this aspect of the chapter. Consideration will be given to potential measures that could address identified negative health outcomes.	As above.	09.09.2022
13.9.	GCC	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 other mitigations identified via these conversations.	Noted. The Human Health element of the ES will be developed further, in accordance with LA 112. DMRB LA112 does not require significance to be assigned to human health outcomes - no methodology is provided for this aspect of the chapter. Consideration will be given to potential measures that could address identified negative health outcomes.  The consultee suggestions regarding mitigation will be given due consideration, in relation to the effects that may be identified.	As above.	09.09.2022
13.10.	GCC	The potential benefits to communities living close to existing 'rat runs' through Hesters Way could be offset by the development	The Population & Human Health (P&HH) assessment draws on the findings of the noise and air quality assessments (amongst others).	As above.	09.09.2022

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		of new rat runs during the construction period and beyond. An assessment of when and where these could 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>Both of these develop modelling that in turn is rooted in traffic modelling for the Scheme - this traffic modelling will explore the likely dispersion of traffic across the network under different scenarios and should identify potential changes to 'rat runs' as part of the process of developing an understanding of the 'affected route network' (which may extend beyond the scheme boundaries), allowing for the resultant impacts on traffic flows, air quality and noise climate to be quantified in accordance with the recognised DMRB methodologies.</p> <p>The P&amp;HH assessment will follow the LA112 methodology to take account of these technical assessments and highlight them as appropriate within the ES.</p> <p>The consultee hypotheses regarding potential rat runs will be given due consideration in relation to the effects that may be identified.</p>		
14. Climate					
14.1.	CBC / TBC	The Joint Councils note that the Scheme will contribute 114,207 tCO2e net emissions towards the Carbon Budgets as far as 2037 and	Further details on significance will be provided within the ES. It should be noted that significance is determined primarily through	This was raised in our comments in paragraph 2.12.3 of the PEIR response. The Joint	27.09.2022

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		that it is identified that the Scheme will not therefore have a significant effect on climate. The Joint Councils would expect to see more details on how 'significant' is defined in the ES.	whether the Scheme will materially impact the ability for the UK to meet its carbon reduction targets. GCC will continue to work with project stakeholders, including National Highways, to ensure our approach is consistent with other schemes and relevant legislation.	Councils will review this information when submitted.	
14.2.	CBC / TBC	The Joint Councils welcome the mitigation measures outlined in the PEIR. However, they would expect to see further specific mitigation measures implemented as part of the Scheme.	Specific mitigation measures included as part of the Scheme will be outlined in the ES. Minimising Greenhouse Gas (GHG) emissions through design is a core principle of PAS2080:2016 and evidence of this will be provided within the ES. 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.	This was raised in our comments in paragraph 2.12.4 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022
14.3.	CBC / TBC	The Joint Councils note that no land use change assessment has been undertaken in the PEIR due to data not being available. However, they would welcome this being included in the ES.	This data is expected be available during the assessment undertaken for the ES, with Land Use change included.	This was raised in our comments in paragraph 2.12.5 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022
	CBC / TBC	CBC and TBC declared a climate emergency in July 2019 and October 2019 respectively. CBC are currently working on a climate change pathway which is expected to go to Council for approval in	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	This was raised in our comments in paragraph 2.12.6 of the PEIR response. The Joint	27.09.2022

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		<p>February 2022.CBC has set an ambitious target of being net zero as an organisation and Borough by 2030, and TBC has also committed to achieving carbon neutrality in Council services by 2030. Therefore, the Joint Councils would expect the Scheme to consider carbon 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.</p>	<p>carbon emissions when compared to a 'with development, but without scheme' scenario.</p> <p>The ES will include as assessment of greenhouse gas emissions from the construction and the operation of the Scheme.</p>	<p>Councils will review this information when submitted.</p>	
14.4.	CBC / TBC	<p>The review has found extensive reference to operational impacts of climate change to the Scheme and mitigation of those impacts. However, in sections 14-15, the operational impact of wildfires, both to road furniture/equipment and landscaping and 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</p>	<p>Assessment of wildfire impacts will be included within the ES: 'Hotter drier summers could more regularly create wildfire conditions affecting landscaping and other scheme assets e.g., roadside furniture. Emergency responses and more regular preventative maintenance may cause traffic disruption.'</p> <p>Impacts on electrical equipment are already considered and the section will be expanded in the ES to specifically mention humidity:</p>	<p>This was raised in our comments in paragraph 2.12.8 of the PEIR response. The Joint Councils will review this information when submitted.</p>	27.09.2022

Matters Reference Number	Parties Concerned	Position of Interested Party	Applicant Response	Joint Council Comment	Date
		to increased corrosion rates, to be included in the ES.	'Changes in humidity may affect reliability of electrical equipment (higher humidity increases condensation which can lead to corrosion, e.g. rust, causing short circuits, premature deterioration of performance, overheating or even electrical fires.'  Roadside furniture will be designed to be in accordance with the Specification for Highways Works and the appropriate British Standards.		
<b>15. Assessment of Cumulative Effects</b>					
15.1.	GCC	In the Cumulative Effects chapter of the forthcoming ES, intra-scheme topics that ought to be covered include Safe Lighting/Biodiversity/Landscape, Highway Drainage/Biodiversity and Visual Impact & Landscape Character/Biodiversity	The methodology for the Cumulative Effects Assessment (CEA) includes a process for the identification of intra-Scheme cross-topic cumulative effects. This will explore effects on a receptor-centric basis, drawing on the outputs of the topic assessments. It is not appropriate to pre-empt what the combinations of cross-topic cumulative effects may be prior to this detail being available; however, the comment is noted and if these interrelationships emerge as relevant to the CEA then they will be duly written into the ES.	Agreed  Confirmation required from GCC to move to agreed or delete this matter.	09.09.2022



Matters Reference Number	Parties Concerned	Position of Interested Party	Applicant Response	Joint Council Comment	Date
15.2.	GCC	<p>There is a need to consider other development which may have a cumulative impact with the proposed Scheme. Part of this process will be to consider Reasonably Foreseeable Future Projects including major planning applications in the vicinity of the Scheme, registered Transport and Works Act order, development plan projects amongst others.</p> <p>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 EIA. Further consultation will take place at that stage to provide a shortlisting process. We would welcome further opportunity to comment on this as the EIA is developed. A key consideration of this will be to consider how the traffic flows from these proposals have been considered in the 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.</p>	<p>This forms part of the CEA that will be reported in the ES.</p> <p>This forms part of the CEA that will be reported in the ES. The Reasonably Foreseeable Future Projects (RFFP) long-list has been produced and a short-listing process is underway. In addition to this, the CEA team is liaising with the traffic modelling team to confirm the way in which the detail of RFFPs 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 the noise and air quality modelling and assessment work).</p> <p>Relevant technical stakeholders will be engaged in a process of validating the RFFP shortlist, the scope of which will include the traffic modelling.</p>	See earlier Highway Development Management (HDM) comment at 1.3	<p>09.09.2022</p> <p>Awaiting response</p>



Matters Reference Number	Parties Concerned	Position of Interested Party	Applicant Response	Joint Council Comment	Date
16. Engineering Design					
16.1.	GCC	Policy PD1.3 – Bus Priority which seeks to manage and develop bus priority to facilitate the free movement of buses along congested routes.	Provision for buses is being reviewed and design changes, if required, will be incorporated into the design.	See earlier Highway Development Management (HDM) comment at 1.3	09.09.2022 Awaiting response
16.2.	GCC	Policy PD2.1 – Gloucestershire’s Cycle Network which seeks to deliver high quality, coherent, direct, safe, comfortable and attractive cycle networks.	The Scheme includes provision for active travel within the scheme boundary whilst connecting into existing active travel infrastructure. Developers and local planning authorities are anticipated to continue to develop complimentary facilities and provision beyond the scheme boundary.	See earlier Highway Development Management (HDM) comment at 1.3	09.09.2022 Awaiting response
16.3.	GCC	At this stage, the submitted scheme drawings do not provide any details of the proposed signing or lining of the road scheme. As above, it is expected that Design Fix 3 will provide this further information to inform the assessment. However, at this stage we have several comments on the Scheme as proposed which will need to be included within this Design Fix 3	Draft signage and lining will be included in the preliminary designs as part of the submission of the DCO application.	See earlier Highway Development Management (HDM) comment at 1.3	09.09.2022 Awaiting response
16.4.	GCC	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 use of non-car modes. Again, further points of clarification will be	We note the provision of a dedicated cycle path on the northern side of the A4019 is supported. Further detail on proposed bus stops and cycle lanes will be provided at the next stage of design.	See earlier Highway Development Management (HDM) comment at 1.3	09.09.2022 Awaiting response

Matters Reference Number	Parties Concerned	Position of Interested Party	Applicant Response	Joint Council Comment	Date
		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.	At the eastbound Elms Park bus stop near Homecroft Drive it is envisaged that this would include a bus stop bypass layout with 2.5m wide island and mini zebra crossing of the cycle track to maintain segregation.		
16.5.	GCC	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 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.	<p>We are currently assessing the viability of proposed signal heads as part of the on-going preliminary design. Possible improvement options include adding supplementary signal heads. Swept path analysis has been undertaken at junctions and access roads and these plans can be provided on request after the next stage of design is completed. At the A4019/The Green/Access road junction, large vehicles including a 7.5t box van and refuse vehicle have been assessed and these can perform the likely turning movements with some limited over-run into opposing lanes in places.</p> <p>'Keep Clear' markings will also be 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</p>	See earlier Highway Development Management (HDM) comment at 1.3	09.09.2022  Awaiting response

Matters Reference Number	Parties Concerned	Position of Interested Party	Applicant Response	Joint Council Comment	Date
			<p>and sufficient for a standard car to enter. Access to the service road could be temporarily obstructed if a large vehicle pulled up to the stop line either from The Green or from the western service road and if this corresponded with a time when other vehicles were trying to gain access to The Green/eastern service road from the A4019. However, this has been considered to be low frequency given the relatively low flows on The Green and even lower flows on the service roads.</p> <p>The installation of a traffic signals ahead warning sign to diag 543 with arrow on the service roads could also be considered at detailed design.</p> <p>The design at this location comprises a non-typical layout based on the need to minimize 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.</p>		

Matters Reference Number	Parties Concerned	Position of Interested Party	Applicant Response	Joint Council Comment	Date
16.6.	GCC	Is it sufficient to have same colour lines as a segregated barrier at the motorway junction?	We are not clear on the comment, however, if it refers to the method for segregating cyclists and pedestrians through the junction then this level of detail will be worked up at the next stage of design. It is likely that the segregation will be some form of kerb or separation strip and not just coloured lines.	Officers content with response  Confirmation required from GCC to move to agreed or delete this matter.	22.09.2022
16.9.	GCC	From a Public Rights of Way (PROW) 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.	We currently have plans to link the bridleway in the comment (AUC1) to the north of the A4019 with the new cycling and walking provisions included within the scheme. 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. We are continuing to look into options at the west end and further links between (AUC1) and Withybridge lane, options around this link include the provision of a grade separated underpass or an at-grade equestrian crossing facility. We are looking to open further discussions with GCC PROW and then wider stakeholders such as the British Horse Society to determine	Agreed  Confirmation required from GCC to move to agreed or delete this matter.	09.09.2022

Matters Reference Number	Parties Concerned	Position of Interested Party	Applicant Response	Joint Council Comment	Date
			to the most suitable facility in this location.		
17. Draft Development Consent Order					
17.1.	GCC	This is not an exhaustive list of the policies contained within the LTP, and as per the requirements of the NPS it is expected that the applicant fully outlines how the Scheme fully aligns with the policies within the LTP.	The DCO application will contain further details on alignment with national and local polices.	See earlier Highway Development Management (HDM) comment at 1.3	09.09.2022  Awaiting response
18. Land					
18.1.	GCC	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 (GFRS) to understand their requirements for access. With the 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 (TRO) will be required to restrict vehicles heading east on the A4019 using this section of highway to turn right or complete U-turn movements.	We will continue to liaise with GFRS to ensure their requirements are met. The design currently proposes use of Wig Wags (as current situation) to allow emergency exit onto the A4019. We note your comment on the Traffic Regulation Order.	See earlier Highway Development Management (HDM) comment at 1.3	09.09.2022  Awaiting response

Matters Reference Number	Parties Concerned	Position of Interested Party	Applicant Response	Joint Council Comment	Date
19. Environmental Management Plan					
19.1.	CBC / TBC	The proposal for a monitoring plan is welcomed. This should be committed to within the ES, 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.	These matters will be addressed in the ES. Any monitoring required for European Protected Species will also be agreed with Natural England as part of the licensing process.	This was raised in our comments in paragraph 2.5.17 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022
20. Construction Traffic Management Plan					
20.1.	CBC / TBC	The Joint Councils note that construction traffic was not considered in the PEIR, 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 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 DMRB LA 105 guidance.	The methodology in LA105 will be applied to updated construction information for the ES.	This was raised in our comments in paragraph 2.3.7 of the PEIR response. The Joint Councils will review this information when submitted.	27.09.2022

# Appendices



## Appendix A. Matters to be determined

- A.1.1. There are some matters which the position of the Joint Councils 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 the Joint Councils during the examination of the DCO application and discussions will be aided by the Joint Councils 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 Joint Councils

Ref	Matter	Position	Date of the latest position



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