

M5 Junction 10 Improvements Scheme

Statement of Common Ground West Cheltenham (Golden Valley) TR010063 - APP 8.9

Regulation 5(2)(q)

Planning Act 2008

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

Volume 8
December 2023

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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]

8.9 Statement of Common Ground West Cheltenham (Golden Valley)

Regulation Number:	Regulation 5(2)(q)
Planning Inspectorate Scheme Reference	TR010063
Application Document Reference	TR010063/APP/8.9
Author:	M5 Junction 10 Improvements Scheme Project Team

Version	Date	Status of Version
Rev 0	December 2023	DCO Application

STATEMENT OF COMMON GROUND

This Statement of Common Ground has been prepared agreed by (1) Gloucestershire County Council, (2) Cheltenham Borough Council (developer) and (3) Midland Land Portfolio (MLP).

Signed

On behalf of Gloucestershire County Council

Date:

Signed

On behalf of Cheltenham Borough Council (Developer)

Date:

Signed

On behalf of Midland Land Portfolio (MLP)

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 is 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

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

1. Introduction

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

1.2. Purpose of the report

- 1.2.1. This document is a Statement of Common Ground (SoCG) between GCC (the Applicant) and the key development partners for the West of Cheltenham allocated site - Cheltenham Borough Council (CBC) and Midland Land Portfolio (MLP) (The West Cheltenham Developers (Also known as Golden Valley). The SoCG is in relation to the M5 J10 Improvements Scheme.
- 1.2.2. The document identifies the following between the parties:
- Summary of engagement and consultation;
 - Matters which have been agreed; and
 - Matters currently outstanding (subject to negotiation or not agreed)
- 1.2.3. The matters which are referenced in this document are considered to be of material difference. Other lesser matters, such as those that concern amendments to supporting documents, will be reported on in the Consultation Report or addressed in the Environmental Statement (ES), submitted as part of the DCO.
- 1.2.4. The SoCG will continue to evolve as the application for development consent progresses through the pre-application and Examination stages.

1.3. Structure of Statements of Common Ground

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

1.4. Status of this SoCG

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

- 1.4.2. It is acknowledged that the views and opinions of both parties may change over time and as such this SoCG will continue to evolve as the application for development consent progresses through the Examination Stage.

2. Consultation

2.1. The Role of Gloucestershire County Council (the Applicant)

- 2.1.1. In this SOCG, Gloucestershire County Council (GCC) is the Applicant for Scheme and this is separate and independent from the other functions and statutory duties carried out by the Council. As Applicant, GCC are promoting and delivering the Scheme with support of the rest of the Council, other Local Planning Authorities, National Highways and Homes England. This is to be recorded in separate SOCGs with the other parties.

2.2. The Role of CBC and MLP

- 2.2.1. CBC have been engaged in their capacity as promoter/developer of the Golden Valley Development, which is separate to the role of the Council as a local planning authority.
- 2.2.2. MLP is a property development arm of Severn Trent Water and Northern Trust. MLP appointed St Modwen as development partner for the Golden Valley Development in January 2021. In October 2022 an application for outline planning permission (22/01817/OUT) was submitted St Modwen and MLP for the development outlined below:

Land to the South of Old Gloucester Road (B4634), Cheltenham, Gloucestershire

Outline planning application for residential development comprising a mixture of market and affordable housing (use class C3), which could include retirement/extra care accommodation (use class C2/C3) a flexible missed use area with a community hub (including potentially use classes E, F1 and F2) a primary school and children's nursery to include use of sports pitches to provide public recreation space, site clearance and preparation, green infrastructure, walking and cycling routes, formal and informal public open space, sports pitch provision, drainage and other associated works and infrastructure, including utilities and highways works, all matters reserved except partially for access.

The Application Site is 64 hectares. The residential component totals 1,100 homes with an illustrative accommodation mix supplied with a focus on three and four bedroom homes but ranging from one bedrooms flats to five bedroomed houses. The indicative non-residential land uses comprise 450 sqm small convenience store, 250sqm of café space and co-working office space and 300 sqm of community hub elements (parcel space, community space and bookable rooms and site offices/management).

Policy A7 expects the delivery of approximately 1,100 residential homes and 45 ha. of business development, focussed on a cyber security hub.

A collaborative masterplan is included in the outline application as a live document, and this indicates that CBC and development partners are expected to submit further applications for parcels of land within the east and south of the JCS allocation site, for potentially 1,500 additional homes, plus the cyberpark.

- 2.2.3. The West of Cheltenham Developers role in relation to the DCO process derives from their joint venture in the development of Golden Valley, a strategic development site identified at West Cheltenham in the adopted Joint Core Strategy.
- 2.2.4. The M5 Junction 10 Improvements Scheme will support the development of the Golden Valley.

2.3. Summary of Consultation

- 2.3.1. GCC has been in consultation with West of Cheltenham Developers 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 West of Cheltenham Developers 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 CBC and MLP since the Preferred Route Announcement on 16/06/2021 is set in Table 2-1.

Table 2-1 - Consultation with MLP / CBC

Date	Method	Parties concerned	Matters discussed
16/06/2021	Email	MLP	M5 Junction 10 preferred route announcement made via email.
18/06/2021	Email	MLP	Atkins PM shared the latest interim design update, layout plans, and 2D AutoCAD model files for the highway layout.
21/06/2021	Email	MLP / St Modwen	Prior to the preferred route announcement, Atkins PM shared the assumptions of the traffic model (20/04/2021). An updated traffic modelling assumption was sent (18/06/2021). MLP raised requested further details.
18/08/2021	Email	MLP / St Modwen	MLP requested a catchup to understand the latest progress on the Project.
23/08/2021	Email	Atkins / MLP / St Modwen	Atkins PM provided an update on the project, informing them that the Scheme has been classified as an NSIP and a DCO application is due to be made in late 2022.
08/09/2021	Virtual Meeting	CBC / Atkins / GCC	Atkins PM delivered presentation on latest updates to the Scheme.
16/09/2021	Email	Atkins PM / CBC	Atkins PM shared a copy of the M5 Junction 10 update presentation, and minutes of a meeting held in previous week.
16/09/2021	Email	MLP	Atkins PM shared a link containing a copy of the presentation, notes of previous meeting and latest design after a Scheme meeting held in the previous week.
20/09/2021	Email	Atkins PM / MLP	Atkins PM confirmed traffic model assumptions remain unchanged as requested in meeting. MLP asked for clarity on LinSig versions. Atkins PM provided further detail clarifying network versions.

Date	Method	Parties concerned	Matters discussed
13/10/2021	Email	Atkins Comms team / MLP	Email sent to MLP to confirm the address for USB delivery containing all consultation documents.
11/11/2021	Email	MLP	MLP confirmed address and point of contact for consultation documents.
15/02/2022	Email	CBC	Representation from CBC's development partner for the development of land at West Cheltenham (Golden Valley Development).
30/05/2022	Email	Atkins PM / MLP	Atkins PM shared a draft agenda for the upcoming MLP meeting.
15/07/2022	Email	Atkins PM / MLP	Atkins PM shared placeholder for a meeting to update on flood modelling.
05/08/2022	Email	Atkins Comms Team / CBC	Additional targeted non statutory consultation notification sent to CBC along with the proposed design changes and plans via secure FileTransfer link.
26/08/2022	Email	Atkins Comms Team / CBC	Follow up email sent to CBC as a reminder to have representations to the targeted non statutory consultation before 04/09/2022.
15/02/2023	Email	Savills on behalf of MLP & St Modwen	Email response received to further targeted consultation (Jan-Feb 2023).
02/03/2023	Meeting (Virtual)	Atkins PM team / St Modwen / Savills / WSP / GCC PM	Meeting held by Atkins PM to update on status of the Scheme. Attendees were informed of a delay to the DCO submission as Homes England treasury review of their portfolio of projects. Updates were provided on St Modwen's outline planning application submitted October 2022 (Ref: 22/01107/OUT). Targeted consultation responses were discussed.
27/05/2023	Email	Atkins PM / St Modwen	Atkins PM shared a copy of the draft SoCG and the following finalised draft DCO documents; <ul style="list-style-type: none"> • Planning Statement • Environmental Statement (Non-technical summary, chapters 1-15 and figures) • Environmental Management Plan • Transport Assessment • Register of Environmental Actions and Commitments • Environmental Masterplans • General Arrangement Drawings • Works Plans

3. Topics covered in this SoCG

3.1.1. The following table is a summary of the topics which 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 will show those matters which have been agreed, including the matter reference number, and the date and method by which it was agreed.

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

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

Matter Reference number	Position	Parties Concerned	Date and method of agreement
1. Principle of Development			
1.1	CBC - Our plans for the Golden Valley Development form part of a broader masterplan that will see the delivery of 2,500 new homes and 2m sqft of commercial space. Subject to future Local Plan iterations, this number may increase. The proposed M5 J10 works will help to facilitate the Golden Valley Development, and we are supportive of the principle of the designs presented for J10. We understand that these will increase capacity at both J10 and alleviate delays at J11. Both points are welcomed in the context of the delivery of the strategically important growth that is planned at Golden Valley.	CBC	15/02/2022 – Statutory Consultation response
1.2	CBC - Notwithstanding this, we assume that GCC and National Highways are aware of the Connecting Cheltenham Strategy, which is designed to reduce car dependence across Cheltenham. We therefore equally welcome the inclusion of high-quality cycle connections in the designs. These will ensure that future residents, employees and visitors to this key development area will be able to travel by this important mode of transport.	CBC	15/02/2022 – Statutory Consultation response
2. Statutory Consultation			

Matter Reference number	Position	Parties Concerned	Date and method of agreement
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		

Matter Reference number	Position	Parties Concerned	Date and method of agreement
14. Climate			
15. Assessment of Cumulative Effects			
16. Engineering Design			
17. Draft Development Consent Order			
18. Land			
19. Environmental Management Plan			
20. Construction Traffic Management Plan			

5. Matters Outstanding

5.1. Principal matters outstanding

5.1.1. There are currently no principal matters outstanding between Applicant, and MLP.

5.2. Matters outstanding

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

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

Matter Reference Number	Position of interested party	Response	Date of the last position
1. Principle of Development			
2. Consultation			
2.1.	CBC - We await a final position on the proposed Infrastructure Recovery Strategy (IRS), consulted on in March 2021. The IRS proposes a mechanism to recover the costs of the proposed M5 J10 works from developments that in some way benefit from those works. Cheltenham Borough Council as landowner and developer raised a number of concerns about the mechanism proposed. It would be very helpful to get clarity on the future of the proposal set out in the IRS.		CBC 15/02/2022
2.2.	CBC - The timing of the works is obviously an important factor. The consultation pack predicts that the works will be completed by 2025. We would be grateful if you could keep us informed of progress against this timeline, and any changes to it.		CBC 15/02/2022

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. Minerals and Waste			
13. Population and Human Health			
14. Climate			

15. Assessment of Cumulative Effects			
16. Engineering Design			
16.1.	CBC - There are perhaps two further areas that could enhance active/sustainable travel provision. One further enhancement would be the to provide the cycle lanes that are planned adjacent to the A4019 and West Cheltenham Link Road connected by a similar facility adjacent to B4634 to ensure a more interconnected network for cyclists.		CBC 15/02/2022
16.2.	CBC - A second enhancement would be the provision of bus lanes/priority at J10 to improve public transport to/from and across J10. It is not clear if bus priority has been included in the modelling works that have been undertaken and if so the construction cost implications for this have been taken into account when reaching the designs that are currently being consulted upon. We would have thought that in the context of the wider aim of decarbonising transport that such a measure is future proofed, if not provided at this stage due to cost. We would respectfully request that all technical and financial evidence related to bus priority be shared at the DCO. We consider it essential that this nationally significant piece of infrastructure not only caters for current planned growth and travel patterns, but subsequent Local Plans and expected changes in travel behaviours; the use of buses being a key component of the Connecting Cheltenham Strategy.		CBC 15/02/2022
16.3.	As you are aware, in October 2022 Savills submitted an outline planning application (EIA development) to Tewkesbury Borough Council (Ref: 22/01107/OUT)		MLP & St Modwen 15/02/2023

	<p>and Cheltenham Borough Council (Ref 22/01817/OUT) in respect of land to the West of Cheltenham, on behalf of MLPL and St. Modwen (the “Applicants”). A copy of our red line plan is shown below.</p> <p>The extract below from the Targeted Consultation Layout Plan shows the locations of the proposed changes which are in proximity to the outline planning application site. These changes relate to extensions to the red line boundary for the M5 Junction 10 Improvements Scheme to accommodate utility diversions and to allow for working space. As you will note, these proposed changes are close to, or overlap, the outline planning application red line boundary.</p> <p>While the outline planning application and the M5 Junction 10 Improvements Scheme are independent developments, it is important that, where there is an interface between them, the implications are carefully considered and appropriately coordinated between the interested parties.</p>		
16.4.	<p>In respect of the pending outline application at West Cheltenham, the key interface between the two schemes is at Old Gloucester Road. It is currently envisaged that the 4-arm junction at the south end of the new West Cheltenham Link Road with Old Gloucester Road will eventually become the primary access to the West Cheltenham development. In the interim period, the outline planning application is proposing an interim access from Old Gloucester to facilitate the early phases of the development. This access will be downgraded or stopped up at the point the primary access is delivered.</p>		MLP & St Modwen 15/02/2023
16.5.	<p>In respect of the proposed overhead line diversions, we note that some lines proposed for diversion as part of the Improvements Scheme could be within,</p>		MLP & St Modwen 15/02/2023

	or overlap, the West Cheltenham emerging diversionary works package. This will depend on timing, and so continued communication and coordination will be necessary.		
16.6.	<p>Utilities</p> <p>In respect of the proposed overhead line diversions, we note that some lines proposed for diversion as part of the Improvements Scheme could be within, or overlap, the West Cheltenham emerging diversionary works package. This will depend on timing, and so continued communication and coordination will be necessary.</p>		MLP & St Modwen 15/02/2023
16.7.	<p>The following comments have also been made in respect of the emerging West Cheltenham proposals for underground diversion routes:</p> <ul style="list-style-type: none"> • The 11 kV underground diversion route will run across change areas 15 and 20. We therefore understand that there is potential for third party consent requirements (if land is transferred out of the development) for the underground easement to cross land, and a crossing agreement may be required, should the cable route cross any existing utilities or new services. • The 11kV proposed underground cable route and termination pole (change number 20) is proposed to be located within this extended area. • The 11 kV cable route will pass underneath the new access road therefore cable lay / ducting / other services in the road will need to be considered (Change 15). • An 11 kV underground cable route for a subsequent phase will pass through Change number 20 land), as currently drafted. 		MLP & St Modwen 15/02/2023

16.8	Clarification is also requested as to whether the reference to the “WPD Diversion (Change 20)” are offsite Overhead diversions.		
16.9	Open Space Following a review, it is noted that some of the junction works will encroach into the area we have identified for open space – see graphic below (yellow hatching being the open space area). Clarification is sought in respect of the reference to “works”, and whether this would ultimately become open space again, or if it would permanently be some form of hardstanding or similar.		MLP & St Modwen 15/02/2023
16.10.	Ground Conditions The proposed extended boundary of the M5 Junction 10 scheme encroaches onto the north of the site. The boundary changes in this area appear to relate to land required for utility diversion works and for working areas associated with construction of the highway access. Our technical consultant has advised that, on the assumption that these proposed works within the site boundary are carried out in accordance with a CEMP for the Scheme, then they have no concerns from a land contamination/ground conditions perspective.		MLP & St Modwen 15/02/2023
16.11.	Drainage On the assumption that the revision to the red line boundary for location 20 (utilities diversion) of the Targeted Consultation Layout Plan is to underground the overhead cable, shown as the purple dashed line within the Layout Plan, then this will impact on the proposed flood storage areas, as shown by the extract below. Further engagement is necessary to better understand the proposals and implications.		MLP & St Modwen 15/02/2023

17. Draft Development Consent Order			
18. Land			
19. Environmental Management Plan			

Appendices



Appendix A.

- A.1.1. There are some matters which the position of CBC / MLP is pending upon publication of the full suite of DCO application documents.
- A.1.2. The Applicant will continue to review matters with the interested parties during the examination of the DCO application and discussions will be aided by the interested parties 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 & MLP

Ref	Matter	Position	Date of the latest position

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