

Highways Commissioning
Block 5, 6th Floor East
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22nd March 2024

M5 Junction 10 Improvements Scheme

Dear Sir / Madam,

Application by Gloucestershire County Council for an order granting Development Consent for the M5 Junction 10 Improvements Scheme

Advice following issue of decision to accept the application for examination – Planning Act (2008) as amended - Section 51

Planning Act 2008 – Section 89(3): The Infrastructure Planning (Examination Procedure) Rules 2010 – Rule 9

The DCO Application for Development Consent for the M5 Junction 10 Improvements Scheme (the Scheme) was accepted for examination on 16 January 2024. This letter comprises the Applicant's response to the Planning Inspectorate's advice under Section 51 (S51) of the Planning Act 2008 on 16 January 2024 and Rule 9 advice on 9 February 2024. Where applicable, this letter references S51 advice and observations received from the Planning Inspectorate on 23 November 2023.

The M5 Junction 10 Improvements Scheme Acceptance of Application checklist (Section 55 Checklist) issued alongside the S51 advice has also been reviewed. This response indicates where changes have been made to the DCO application documentation, where documents have been updated and providing a timeline as to when any further changes / updated documents will be submitted into the DCO process.

DCO application documentation that has been updated has been submitted in both clean and tracked copies. included with this letter.

Advice following issue of decision to accept the application for examination – Planning Act (2008) as amended - Section 51

Land Plans (Document 2.2)

PINS comments:

- *Sheet 5 Plot 5/6c & 5/6h of the land plans may benefit from an inset due to the small size and sheer volume of plots surrounding. Some of the locational descriptions of plot numbers in the Book of Reference (BoR) when crossed referenced to the Land Plans could be more accurate. For example, Sheet 5 Plot 5/6d description in the BoR reads "south of Bridge House and northeast of Laburnum" where as on the land plan it appears to be located north west of Laburnum*
- *Sheet 11, Plot 11/1b is described as 'West of Elm Tree Cottage' in the BoR, however the plot appears to be located Northwest of Elm Tree Cottage*

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- *Sheet 11, Plots 11/1d & 11/1f are described as being located 'East of Mill Cottage' in the BoR. Whereas Plot 11/1e is described as being located 'northeast of Mill Cottage'. As the plots are in the same area, they should be re-labelled with the same directional description(east).*

Applicant response: The following updates have been made to the Land plans for the S51 response submission (Application document TR010063APP/2.2). The schedule of changes to the Land Plans is provided in Application document TR010063/APP/9.23.

The Book of Reference (BoR) (Application document number TR010063/APP/4.3) has been updated. The Statement of Reasons (SoR) (Application document number TR010063/APP/4.1) [clean] and Application document TR010063/APP/4.1 [tracked], has been updated. The schedule of changes to the BoR are provided in Application document TR010063/APP/9.22 included in the S51 submission.

Biodiversity Sites and Features Plan – Part 1 – Large Scale Plan (Document 2.11)

PINS comment: Document 2.11 appears to be a merged document of the requirement of 29 (L)(i) and 29 (L)(iii) of the s55 checklist, as it combines biodiversity features (on a single sheet) and water bodies in a river basin management plan (16 sheets). The water bodies figure does not have a separate entry on the document index, and as such is it advised that this be provided as two separate documents. The water bodies shown on this plan are also not clearly labelled on each sheet, (however a figure with clear labelling is provided in 6.15 ES Appendix 8.4).

Applicant response: The Biodiversity Sites and Features Plans (application document TR010063/APP/2.11) are intended to show the local watercourses and the sites designated for nature conservation and landscape within the vicinity of the Scheme. The Plans have adopted the same 16 sheet layout as other plans submitted, such as the General Arrangement Plans (Application document TR010063/APP/2.9) and the Environmental Masterplans (Application document TR010063/APP/2.13). However, there are no nature conservation or landscape designated sites within the areas shown by these 16 sheets, and therefore no such receptors are shown. The large-scale plan was therefore included as an extra sheet to show nature conservation or landscape designated sites in the wider area around the Scheme. There is, therefore, no reason to produce the plans as separate documents.

PINS comment: The exported large scale plan has some rendering issues, where the (former) Area of Outstanding Natural Beauty (now known as National Landscape) layer has sporadic horizontal lines that are not shown in the legend. The Applicant is also advised to update the terminology used.

There is also no base map to indicate the geographical location of the identified sites/features.

Applicant response: The Biodiversity Sites and Features Plan (Application document TR010063/APP/2.11) has been updated and changes made to the rendering of the green shaded area, and to the labelling of the Landscape area. The Cotswolds AONB has been amended to Cotswolds National Landscape.

A base map has also been included.

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Environmental Master Plan (Part 2) (Document 2.13)

PINS comment: The final plan in the second part of the Environmental Master Plan is the “Proposed Indicative River Chelt Link Road River Cross-Sections” and should be removed as it does not appear to be part of the correct document.

Applicant response: The Applicant considers that this figure should be included as part of the Environmental Masterplans as it provides information on Environmental mitigation.

Draft DCO (Document 3.1)

PINS comment: There appears that there may be a contradiction between the Environmental Statement (ES) and the DCO as the DCO would allow for a depth of up to 2 metres, while the ES Chapter 2, paragraph 2.5.30 states that storage for 190,298 cubic metres of floodwater storage would be provided, with permitted excavation no deeper than Piffs Elm culvert. Please ensure consistency between documents.

The Applicant is advised to explain the reason for the change between the use of square metres in the DCO and cubic metres in the ES with reference to flood storage.

Applicant response: The 190,298m³ value is a functional requirement for flood storage, and not a limit of deviation. The associated Limits of Deviation (LoD) with respect to the excavation of the flood storage area provide the necessary flexibility within the dDCO to achieve the required flood storage volume.

Separately, the Applicant has updated the dDCO to accommodate the updated land plans. The Applicant has also included an additional article 47. The Applicant has provided a reason for this change in the dDCO Table of Amendments (Application document TR010063/APP/9.21).

Environmental Statement (Document 6.1 – 6.15)

Description of the Development

PINS comment: The Inspectorate has identified inconsistencies in the way the Proposed Development has been described in the ES and other application documents. Examples include:

- *the required volume of flood storage, including the permitted maximum depth / limits of deviations for excavations (as above);*
- *the slope of the embankments; and*
- *the volume of fill required (as below).*

The above are examples only and the Applicant is advised to ensure that there is consistency in the project description for all elements across all documents, or an explanation as to why any parameters have been considered differently.

Applicant response: The Applicant considers that the inconsistencies suggested in the way the Proposed Development has been described in the ES and other application documents regarding the volume of flood storage, slope of embankments and volume of fill has been addressed in the documents submitted for the DCO application in December 2023. The Applicant has undertaken a consistency check of all DCO application documents and did not identify any material inconsistencies requiring an update.

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PINS comment: The ES does not include information about the expected number of construction workers, associated vehicle movements, or the number of parking spaces proposed as part of construction compounds (if any). The Applicant should provide this information or, if it is not yet known, confirm a worst-case scenario with an explanation as to how this has been established.

Applicant response: The assessment of construction worker and associated vehicle movements has now been undertaken following engagement with the ECI Contractor. ES Chapters 2, 5, 6, 13 and 14 have been updated to reflect this information. This information is provided in updates to the following chapters:

- ES Chapter 2: The Scheme (Application document TR010063/APP/6.2)
- ES Chapter 4: Assessment Methodology (Application document TR010063/APP/6.2)
- ES Chapter 5: Air Quality (Application document TR010063/APP/6.3)
- ES Chapter 6: Noise and Vibration (Application document TR010063/APP/6.4)
- ES Chapter 13: Population and Human Health (Application document TR010063/APP/6.13)
- ES Chapter 14: Climate (Application document TR010063/APP/6.14)

Clean and tracked version of the above documents are provided to the Planning Inspectorate in the S51 submission.

PINS comment: The quantum of excavations and import of materials, also need to be clarified as there is a discrepancy with information presented in ES Chapter 12 (Document 6.10) compared to Chapter 2. Table 12-9 appears to state that 664,873m³ of primary aggregate would be imported to site, which with the c. 200,000m³ available from the flood storage excavation as noted in paragraph 2.8.12, would lead to a total required fill volume of 864,873m³, rather than the c. 660,00m³ stated in ES Chapter 2.

Applicant response: The Applicant has made changes to ES Chapter 2 - The Scheme (TR010063/APP/6.2) to address this comment. As further explanation:

- Table 12-9 of ES Chapter 12 – Materials and Waste (Application document TR010063/APP/6.12) states 664,873m³ of primary aggregate required.
- Para 12.9.3 of ES Chapter 12 – Materials and Waste states 148,409m³ of material that could be re-used.
- The c.660,000m³ value in para in ES Chapter 2 - The Scheme represents the total fill requirement of the Scheme. It is presented as an approximate figure in Chapter 2 and is therefore considered to match the value in Table 12-9.
- The c.200,00m³ value is the total volume of fill material from the excavation of the flood storage area. This has now been amended in Chapter 2 to 150,000m³ so as to match Para 12.9.3 in Chapter 12 as the volume of excavated fill that is suitable for re-use. The c.200,000m³ value is the total quantity of excavated material, and not the quantity of excavated material that is suitable fill.

PINS comment: As set out in our earlier advice to you of the 23 November 2023, understanding the external appearance and means of landscaping remains an important issue. The Guidelines for Landscape and Visual Impact Assessment (GLVIA) suggests that for the majority of EIA development, Type 2 to 4 visualisations should be prepared i.e. wireline or photomontages. This type of visualisation has not been provided and there does not appear to be clear explanation or justification why this scheme would not warrant such

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detail to support the proposal and aid all parties with their understanding of the development. Within the ES Chapter 9 the approach taken relies upon the methodology from the DRMB

that indicates visualisation at year 1 and year 15 are expected, visualisations in line with GLVIA to the standard referred to above would provide far greater clarity for all parties.

Applicant response: Please see response to Rule 9 letter below regarding the status of photomontages / visualisations.

Assessment scope

PINS comment: ES Chapter 5 - Air Quality and ES Chapter 14 - Climate do not include an assessment of emissions from construction worker and vehicle movements. The Scoping Opinion was based on a commitment in the Scoping Report to provide such an assessment as part of the consideration of greenhouse gas (GHG) emissions. The ES should include an assessment of this matter, based on a worst case scenario if the numbers have not yet been established, or otherwise explain by reference to relevant guidance as to why significant effects are not likely to occur.

Applicant response: The assessment of construction worker and associated vehicle movements has now been undertaken following engagement with the ECI Contractor. ES Chapter 5 - Air Quality (Application document TR010063/APP/6.5 [clean] and TR010063/APP/6.5 [tracked]) and ES Chapter 14 – Climate (Application document TR010063/6.14 [clean] and TR010063/APP/6.14 [tracked]) have been updated to reflect this information.

PINS comment: ES Chapter 8 - Road Drainage and Water Environment presents an assessment of effects during the construction phase and concludes a moderate or large (significant) effect for flood risk, which it is stated could be managed through a future iteration of the Environmental Management Plan (EMP) (2nd). The assessment is based on generic impacts associated with road schemes rather than information specific to the Proposed Development

Applicant response: Further information has been included in the ES Chapter 8 (Application document TR010063/APP/6.8 [clean] and TR010063/APP/6.8 [tracked]) regarding the assessment of the construction phase. A requirement for further flood modelling will be secured through the Flood Risk Activity Permit (FRAP).

Flood Risk Assessment (Document 6.15)

PINS comment: ES Appendix 8.1A does not provide information to differentiate between land within Flood Zone 3a and 3b. The Applicant is advised to provide updated figures and text which describe the location and extent of these flood zones.

Applicant response: Flood Zone 3b is a legally defined area and location details are published by the Environment Agency. There is no Flood Zone 3b within the Scheme area. Flood Zone 3b has also not been included in the Strategic Flood Risk Assessment (SFRA). Therefore, the Applicant cannot provide the difference between land within Flood zones 3a and 3b. However, the Scheme has investigated flooding in the 4% AEP event (1 in 25 year) which was a precautionary representation of the functional floodplain during the assessment prior to August 2022. This has not been updated but remains as a proxy to flood zone 3b. This is also described in the Baseline Modelling Report (Application document TR010063/APP/9.18). The FRA has outlined the baseline flood risk for the 1 in 25-year e

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event. The FRA concludes that the Scheme is conforming with requirements of Flood Zone 3b.

PINS comment: The figures in ES Appendix 8.1B skip from 3-4 to 3-7 and 5-1 to 5-4. It does not appear that any are missing as the contents page appears to indicate that the Applicant did not use the intervening figure numbers; however, the Applicant is advised to confirm this.

Applicant response: The figures 3-5, 3-6, 5-2 and 5-3 are included within the body of Appendix 8.1. The contents page has been updated to reflect this and now references all of the figures. Please see updated FRA (Application document TR010063/APP/8.1 [clean] and TR010063/APP/8.1 [tracked]).

PINS comment: The Flood Risk Assessment (FRA) refers to several other reports including a Scheme Modelling Report and three Atkins reports that have information to support the sequential/exception test, which have not been provided. The Applicant is advised to submit these.

Applicant response: The requested reports have been submitted in the S51 submission and now form part of the DCO application. These are detailed below. The FRA has been updated to refer to these documents where required (see Application document TR010063/APP/8.1 [clean] and TR001063/APP/8.1 [tracked]):

- Baseline Flood Modelling Report (Application document TR010063/APP/9.18)
- Scheme Flood Modelling (Application document TR010063/APP/9.19)
- Flood Risk Impacts at B4634 Old Gloucester Road (Technical Note) (Application document TR010063/9.20).

PINS comment: ES Appendix 8.1 FRA suggests that further modelling of construction phase effects on flood risk may be required at a later stage (for the River Chelt and Leigh Brook), as secured in the Register of Environmental Actions and Commitments (REAC). The FRA also suggests that further assessment of the proposed haul routes may be required. It is unclear how such assessment is secured, as whilst reference is made to other consenting processes (e.g. for environmental permits), it is not categorically stated that this would be used. The Applicant is advised to explain whether the additional modelling and/ or assessment described is required to inform the assessment of construction phase flood risk effects in the ES to support the identification of any further mitigation required.

Applicant response: The FRA has been updated See Application document TR010063/APP/8.1 (clean) and TR010063/APP/8.1 (tracked). The FRAP will secure the further modelling if it is identified as being required.

PINS comment: The FRA states that construction compounds would be located outside of Flood Zone 3 or would require temporary platforms and compensatory storage. This matter is not referenced in ES Chapter 8. The REAC (WE15) states that compounds within the floodplain would be minimised and does not reference compensatory storage (other than the permanent areas in Work Nos. 3, 5 and 7). The Applicant is advised to explain how the siting of construction compounds has been assessed in the ES and whether there is a requirement for compensatory storage on a temporary basis during construction (and if so, whether provision has been made for this within the dDCO).

Applicant response: Further information in relation to modelling of flood risk, including construction compounds, has been provided within an update to Chapter 8 of the ES. Please

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see revised ES Chapter 8: Road Drainage and the Water Environment (Application document TR010063/APP/6.6 [clean] and TR010063/APP/6.6 [tracked]).

ES Appendix 7.3 Bat Survey Part 1 of 2 (Document 6.15)

PINS comment: There is no list / mention of appendices in the contents page. It is recommended that the appendices are listed for information to be easily located.

Applicant response: The contents page has been updated to include list of appendices. Please see Appendix 7.3 of Application document TR010063/APP/6.15.

Consultees identified on a precautionary basis

PINS comment: As detailed in the Section 55 checklist there are several potentially relevant bodies which, on the basis of the information provided by the Applicant, do not appear to have been consulted at the pre-application stage. These are:

- Wales and West Utilities Ltd
- GTC Pipelines Limited
- Mua Electricity Limited
- Optimal Power Networks Limited
- Malvern Hills District Council
- Wychavon District Council

Given the individual circumstances of this case, and taking a precautionary approach to ensure that all persons potentially affected by, or potentially likely to have an interest in, the application are given the opportunity to participate fully in the examination of the application, the Planning Inspectorate suggests that the Applicant may wish to include the above bodies amongst those on whom they serve notice of the accepted application under s56(2)(a) of the PA2008; unless there is a specific justification why this is not necessary.

Applicant response: Appendix K to the Consultation Report has been updated and submitted with the S51 response to include the utilities companies Wales and West Utilities Ltd, GTC Pipelines Limited, Mua Electricity Limited, and Optimal Power Networks Limited. Please see Appendix K of Application document TR010063/APP/5.2 [clean] and TR010063/APP/5.2 [tracked]).

Malvern Hill District Council and Wychavon District Council have now merged. The Applicant can confirm they been consulted previously as shown in Application document TR010063/APP/5.2. They remain as two separate local authorities in Appendix K (Application document TR010063/APP/5.2 [clean] and TR010063/APP/5.2 ([tracked])).

The Infrastructure Planning (Examination Procedure) Rules 2010 – Rule 9 Procedural Decision following issue of Acceptance decision

Set out below is the Applicant's response to the Rule 9 procedural advice on 9 February 2024.

PINS comment: The ExA therefore requests the Applicant to provide the following information:

1. The updated Transport Assessment (TA) information as set out in the s51 advice.

Applicant response: Please see the following documents:



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- Updated Transport Assessment (Application document TR010063/APP/7.5 [clean] and TR010063/APP/7.5 [tracked])
- Transport Assessment Supplementary Report (Application document TR010063/APP/9.17)

PINS comment (23 November 2023): Furthermore, it is understood that the traffic modelling uses the Gloucestershire Countywide Traffic Model (GCTM) Version 2.3 (SATURN) and that this has a base year of 2015 (which was updated in June 2019). It is recommended that the validity of all of the traffic modelling is assessed using present day observations (including traffic surveys etc.). This is considered to be particularly important given that the model base year is prior to Covid-19.

PINS comment (23 November 2023): It would also be helpful for the Transport Assessment to include current year / 2023 assessments so that the future road operation can be considered against current operational performance.

Applicant response: The supplementary report (TR010063/APP/9.17), submitted alongside the updated TA, provides the results of the traffic modelling work undertaken to address the ExA's comments regarding the potential impact of the COVID-19 on the validity of the current forecast models.

The work reported in the supplementary report includes the development of two 2023 forecast models, namely 'with' and 'without' COVID-19 adjustments and their comparisons against 2023 observed data, which include journey time and traffic counts data obtained from Gloucestershire County Council (GCC), National Highways (NH) and Department for Transport (DfT).

The results of this work show that both the 2023 models, with and without COVID-19 adjustment factors, correlate with observed traffic data within acceptable TAG validation tolerances. This demonstrates that the differences in the modelled traffic demand between the two models fall within the range of acceptable validation tolerances for strategic traffic models.

Interrogation of the two models shows that the modelled traffic flows on the road network are consistently higher for the without COVID adjustment model compared to the with COVID adjustment model, but in both cases the variation from the 2023 observed data is within acceptable validation tolerances. This confirms that the traffic model is performing as expected in response to changes in traffic demand. It also indicates that, overall, the with COVID-19 adjustment model compares marginally better with observed traffic flow data. |

The findings of the supplementary report demonstrate that the 2015 base used in the traffic modelling submitted for the DCO application remains valid and is fit for purpose in assessing the Scheme.

2. *The updated Flood Risk Assessment (FRA) information as set out in the s51 advice.*

Applicant response: Please see updated Flood Risk Assessment (Application document TR010069/APP/8.1 [clean] and TR010063/APP/8.1 [tracked]) and supporting documents Baseline Flood Modelling Report (Application document TR010063/APP/9.18), Scheme Flood Modelling (Application document TR010063/APP/9.19) and Flood Risk Impacts at

B4634 Old Gloucester Road (Technical Note) (Application document TR010063/9.20). This collectively addresses the S51 advice relating the FRA received on 23 November 2023 and 16 February 2024, and the Rule 9 procedural decision on 9 February 2024.

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PINS comment: In addition, the ExA also request the following:

- *a plan on an OS base showing the green belt boundary, overlaid by the DCO works plans, and including the local authority boundaries.*

Applicant response: The Applicant has submitted the requested plan showing the green belt boundary overlain by the Scheme design as part of the S51 submission. Please see Application document TR010063/APP/9.15.

- *PINS comment: a Road Safety Audit (Stage 1/2). It is suggested that an appropriate Road Safety Audit is undertaken and submitted to assist in the assessment of the road safety aspects of the proposals having regard to the relevant requirements of the National Planning Policy Statement for National Networks (ref: Section 4.60 – 4.66).*

Applicant response: The Applicant has submitted a Road Safety Audit (Stage 1/ 2) as part of the S51 submission. Please see Application document TR010063/APP/9.16.

- *PINS comment: landscape and visual photomontages from key viewpoints preferably agreed with the Local Planning Authorities clearly showing the scheme including the link road, the A4019 and the M5 junction at year 1 and year 15. These should be undertaken in accordance with the advice of the Landscape Institute. These should enable the ExA and IPs to understand the visual effects of the Proposed Development from within the scheme as well as viewing the scheme from further afield.*

Applicant response: The Applicant has sought agreement with the LPAs on the proposed viewpoint for the visual photomontages. The proposal is to create verified view imagery for each of these six locations for year 1 and year 15, 10 images in total. These will be accurately matched and presented as Type 4 AVRs following the latest guidelines offered by the Landscape Institute (Sept 2019). Once they are prepared, the visual photomontages will be submitted to the Examination at an appropriate deadline.

- *PINS comment: Outline Management Plans.*

Applicant response: The following Annexes to the 1st iteration Environmental Management Plan (fiEMP) (Application document TR010063/APP/7.3) are submitted to the Examination with this S51 submission as requested. These are:

- EMP Annex B.1 Materials Management Plan (1st iteration) (Application document TR010063/APP/9.1)
- EMP Annex B.2 Soil Handling Management Plan (1st iteration) (Application document TR010063/APP/9.2)
- EMP Annex B.3 Noise and Vibration Management Plan (1st iteration) (Application document TR010063/APP/9.3)
- EMP Annex B.4 Air Quality Management Plan (1st iteration) (Application document TR010063/APP/9.4)
- EMP Annex B.5 Landscape and Ecology Management Plan (1st iteration) (Application document TR010063/APP/9.5)
- EMP Annex B.6 Emergency Preparedness and Response Plan (1st iteration) (Application document TR010063/APP/9.6)
- EMP Annex B.7 Pollution Prevention and Control Management Plan (1st iteration) (Application document TR010063/APP/9.7)

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- EMP Annex B.8 Archaeological Management Plan (1st iteration) (Application document TR010063/APP/9.8)
- EMP Annex B.11 Traffic Management Plan (Application document TR010063/APP/9.11)
- EMP Annex B.12 Site Waste Management Plan (1st iteration) (Application document TR010063/APP/9.12)
- EMP Annex B.13 Public Rights of Way Management Plan (1st iteration) (Application document TR010063/APP/9.13)
- EMPS Annex B.14 Emergency Vehicle Movement Management Plan (1st iteration) (Application document TR010063/APP/9.14)
- EMP Annex B.15 Community Engagement Plan (1st iteration) (Application document TR010063/APP/9.15)
- EMP Annex B.16 Carbon Management Plan (1st iteration) (Application document TR010063/APP/9.16)

The EMP and REAC have also been updated to reflect the additional of the Annexes to the EMP (1st iteration). Please see updated Application documents:

- Register of Environmental Actions and Commitments (REAC) Application document TR010063/APP/7.4 [clean] and TR010063/APP/7.4 [tracked].
- First Iteration Environmental Management Plan (fiEMP) Application document TR010063/7.2 [clean] and TR010063/7.2 [tracked].

The Applicant is not submitting the following Annexes recommended by the Planning Inspectorate due to the need for further contractor involvement in the preparation of this Annexes to the EMP. The requirement for a Nuisance Management Plan is superseded by the Statement of Statutory Nuisance which is DCO Application document TR010063/APP/6.16.

- Operational Unexploded Ordnance Emergency Response Plan
- Severe Weather Plan

PINS comment: A draft of any legal agreements envisaged to secure mitigation.

Applicant response: Regarding draft legal agreements envisaged to secure any mitigation, there are currently no draft legal agreements. The Applicant will keep the Planning Inspectorate up to date on the progress of any such agreements during the examination process.

The timeline set out below provides the Planning Inspectorate an indication of when the outstanding documents to address S51 advice and Rule 9 letter will be submitted into the examination process.

- Homes England Funding Letter – in advance of Preliminary Meeting.
- Operational Unexploded Ordnance Emergency Response Plan – in advance of Preliminary Meeting.
- Severe Weather Plan - in advance of Preliminary Meeting.

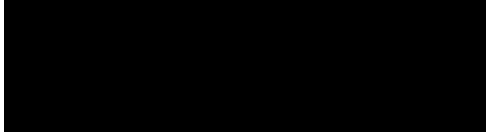
Regarding the request by the Planning Inspectorate in their S51 advice on 23 November 2023, the Applicant notes the request in relation to the Funding Statement and will be liaising with Homes England with a view to agreeing what further information can be provided on funding milestones. This will be provided to the Planning Inspectorate at the earliest opportunity.

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I trust this information provides a satisfactory response to, and addresses the matters raised by the Inspectorate in its S51 advice (on 23 November 2023 and 16 January 2024) and Rule

9 letter (on February 2024) and is sufficient to support the Planning Inspectorate in progressing with the Pre-examination stage of the DCO and the forthcoming Examination.

Yours faithfully,



Chris Beattie
Highways and Infrastructure
Gloucestershire County Council