

# M5 Junction 10 Improvements Scheme

**Applicant Response to Relevant Representations  
RR-005, RR-006, RR-007 and RR-034**

**TR010063 – APP 9.33**

Rule 8(1) (b)

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Infrastructure Planning (Examination Procedure) Rules 2010

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# Infrastructure Planning Planning Act 2008

## The Infrastructure Planning (Examination Procedure) Rules 2010

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

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#### Applicant Response to Relevant Representations RR-005, RR-006, RR-007 and RR-034

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# 1. Introduction

- 1.1.1. The Development Consent Order (DCO) application for the M5 junction 10 scheme was submitted on 19 December 2023 and accepted for examination on 16 January 2024.
- 1.1.2. The purpose of this document is to set out Gloucestershire County Council's combined response to the broader themes raised by those Interested Parties associated with the Strategic Allocations and the Safeguarded land (RR-005, RR-006, RR-007 and RR-034). A separate response is provided in the document (APP/TR010063/9.28) submitted at Deadline 1 to all the Relevant Representation (RR) from interested parties submitted to the Planning Inspectorate.
- 1.1.3. The Applicant understands that within the above-named relevant representations the associated Interested Parties are not necessarily opposed in principle to the Scheme and a number have expressed acknowledgement that the Scheme is a key piece of infrastructure for the area. However, due to the thematic nature of the Relevant Representations received from the aforementioned Interested Parties the Applicant has made the decision to respond to all representations received from developers associated with the Strategic Allocations in one combined response. The Applicant's response is high level, seeking to address the principles of the broader themes and does not seek to address specific comments at this stage, as these will be explored in more detail through the SoCG process and any resultant Written Representations.

## 2. RR-005 – Bloor Homes; RR-006 – Bloor Homes Limited and Persimmon Homes Limited; RR-007 – Cheltenham Borough Council; RR-034 – St Modwen and Midlands Land Portfolio Ltd

Relevant Representation Theme	Applicants Response
<b>Regional and Local Planning Policy Support for the Scheme</b>	<p>Further to the queries raised regarding the regional and local policy support for the Scheme the Applicant outlines below the current policy position in support of its proposals:</p> <p>Joint Core Strategy:</p> <p>As outlined in the Planning Statement [APP-135], significant population and household growth is expected to take place in the Gloucestershire area over the next 10-15 years in line with the Joint Core Strategy’s (JCS) Vision that “As a result of a strong commitment to the housing and employment needs of the existing and growing population, all residents and businesses will benefit from the improved infrastructure, which will include roads, public transport and services, and community facilities.”</p> <p>The JCS, adopted in December 2017, was an iterative process, with assessment of the transport impacts and resultant mitigation developed throughout its Examination. The transport evidence base for the JCS shows five iterations of transport impacts, mitigation and analysis up to October 2016. In response to the Inspector’s Interim Report on the re-submission of the Joint Core Strategy (July 2016) Highways Modelling (Autumn 2016), the fifth iteration (Do Something 5 - DS5) outlined details of a revised mitigation package that represented a departure from DS3a with a focus on road building (including major link roads) and the upgrade of high frequency public transport bus corridors. It also included a number of schemes which are not JCS dependant, but due to changes in scheme status they were included as it was assumed that the impact of the schemes would be significant on the transport network (JCS Transport Evidence Base – May 2017). They included:</p> <ul style="list-style-type: none"> <li>• M5 J10 – Full Movements (including upgrading of existing slips and junction on the A4019 corridor to Coombe Hill)</li> <li>• A417 Missing Link</li> </ul>

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	<p>The DS6 scenario tested the revised land use scenario, this included the West Cheltenham allocation and a minimum upgrade to allow full movements at M5 J10 and was in line with the proposals included in the JCS Proposed Main Modifications document (February 2017). Critical to the scenario was the access arrangements into the West Cheltenham Strategic Site. Within this scenario these are provided via Junction 10 of the M5 and a new distributor road linking into the site from the motorway. The motorway junction improvement comprised a minimum upgrade to allow full movements, with additional capacity provided on the slip roads. The infrastructure included in this scenario did not mitigate the impacts of the scale of development.</p> <p>DS7 included an ‘All Movements’ junction improvements including complementary measures to the M5 mainline. This included a high-capacity upgrade of M5 J10, including three lane motorway off slips; a three circulatory lane, grade separated roundabout with the A4019; and a new signal controlled junction immediately east of the M5 to accommodate the associated West of Cheltenham development access road. There would also be new signals on the A4019 westbound entry to the new grade separated motorway junction.</p> <p>DS7 concluded that the M5 J10 Improvements Scheme was required to enable all of the strategic allocations within the JCS. This is further outlined in paragraph 4.1.12 of the JCS which states that “the upgrading of Junction 10 to an all movements junction will support the economy of the JCS area and that of wider Gloucestershire. It would support accelerated growth of the economy, enabling land to be delivered for mixed use including high value employment.</p> <p>JCS Policies SA1 (7) and (8) provide further policy support for the Scheme in relation to the Strategic Allocations as they require developers to engage with the relevant infrastructure regulators to “ensure the implementation of the Infrastructure Delivery Plan and the provision of any other necessary infrastructure in accordance with Policies INF6 and INF7” and that the “transport strategy to support the delivery of the Strategic Allocations should align with and where appropriate contribute to the wider transport strategy contained within the Local Transport Plan” respectively.</p> <p>Infrastructure Delivery Plan:</p> <p>The JCS Infrastructure Delivery Plan (IDP) (2014) provides a high-level view of infrastructure requirements based on population forecasts between 2011 and 2031. An addendum to the IDP was published in 2017 and includes updated assessments using benchmark standards and relevant evidence baseline studies including the results of the JCS transport mitigation scenario</p>

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	<p>'DS7'. The IDP Addendum 2017 identifies projects that support JCS-wide growth within Table 3.1 – Strategic Infrastructure Schemes including a:</p> <p>“High capacity upgrade of M5 J10 junction providing an ‘All Movements’ junction including three lanes on slip roads and circulatory lanes on the roundabout to accommodate the associated Cyber Park access road / A4019 junction (Scheme ref 28). This will be a high capacity signal controlled junction, with a separate left turn slip road from M5J10 northbound off-slip onto Cyber Park link road (southbound). New signals on A4019 westbound entry to upgrade motorway junction.”</p> <p>Gloucestershire Local Transport Plan:</p> <p>Paragraph 4.2.31 of the Gloucestershire Local Transport Plan (2020-2041) (LTP) (Revised March 2021) outlines that the Central Severn Vale Strategic Vision to 2031 will require improvements to M5 Junction 10 and 11 to maintain the safe operation of the highway. These improvements will also support the delivery of the North West and West Cheltenham strategic allocations, addressing existing traffic congestion issues on the A40 and A4019 corridors.</p> <p>Table CPS1(a) Central Severn Vale – Highway Priorities up to 2031 of the LTP also identifies an “M5 Junction 10 ‘All movements’ access and link road to West Cheltenham as a priority highway scheme, with LTP Table (d) – Strategic Schemes also identifying the same as a Strategic Scheme for the delivery of the LTP.</p> <p>Golden Valley Supplementary Planning Document:</p> <p>The purpose of the SPD is to provide further guidance and details relating to the interpretation of policies set out in the relevant Development Plans. In this case, the JCS. This SPD supplements a number of JCS policies, but in particular Policy A7 West Cheltenham. When considering JCS Site Allocation A7 specifically Paragraph 1.1.6 of the Golden Valley Supplementary Planning Document (SPD) (July 2020) states that “Connectivity is key for The Golden Valley Development to maximise its potential, ensuring both direct access to the motorway and the effectiveness of the local highway network” and that the M5 J10 Scheme will “support JCS strategic allocations at North West and West Cheltenham.”</p>

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	<p>The SPD included the preparation of a development capacity study, informed by the strategic masterplanning work undertaken for the SPD, which highlighted that the allocated site is likely to present the opportunity for a housing capacity of 2,370 dwellings. This assessment supplements rather than updates the provisions of the adopted policy in the JCS, which allowed for:</p> <ul style="list-style-type: none"> <li>• Approximately 1,100 new homes;</li> <li>• Approximately 45 hectares of B-class led employment land to be focussed upon a cyber security hub and other high technology and high ‘Gross Value Added’ generating development and ancillary employment uses;</li> <li>• All development should be employment led, delivery of housing must be in tandem with employment development;</li> </ul> <p>Notwithstanding the above it is also of note that Para 1.1.11 of the SPD states that “As well as providing supplementary guidance to help co-ordinate new development within the allocated site, this SPD also looks beyond the current plan period towards further phases of growth.” Something that the M5 J10 Improvements Scheme looks to facilitate when considering its 2042 design year.</p> <p>The Cheltenham Plan:</p> <p>The Cheltenham Plan (Adopted July 2020) highlights the distribution of key employment sites to the West of Cheltenham. Paragraph 3.9 of the Plan states that “Whilst J10 is still constrained through being two-way rather than four-way, sites to the west of Cheltenham would stand to benefit further should investment be forthcoming to facilitate an all-movements junction in future...The economic strategy as set out in this Plan will support that activity. Upgrading the junction will provide significant economic growth opportunities by unlocking the potential of additional land.” This further emphasises the policy support for the Scheme and the potential for the Scheme to unlock further development opportunities.</p> <p>The Tewkesbury Plan:</p> <p>Paragraph 10.2 of the Tewkesbury Plan (Adopted June 2022) states that “The Gloucestershire Local Transport Plan (LTP), prepared by Gloucestershire County Council provides the overarching strategic context for transport in the area. The LTP contains the strategy, policies and investment priorities for transport and needs to be read along the Local Plan to get the full picture on transport policy.” This reiterates the policy support for the Scheme within the LTP and emphasises the need to consider the Scheme in the context of a plan period that looks beyond that of the JCS.</p>



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	<p>Strategic and Local Plan:</p> <p>Whilst the Strategic and Local Plan is in its early stages of development the Issues and Options Consultation (January to March 2024) would suggest that of the 6 Scenarios proposed only Scenario 2 (Urban Extensions) would appear to meet the housing and employment needs identified. This would include safeguarded land from the JCS as a consideration for the future development strategy and its potential allocation. This demonstrates the direction of travel of local policy and highlights the importance of the safeguarded land or equivalent in policy considerations beyond the current plan period of the JCS.</p> <p>The Applicant considers that the policy context outlined above demonstrates the regional and policy support for the Scheme that is required to unlock all of the strategic allocations within the JCS. This is further emphasised by the policy requirement to ensure the implementation of the IDP and alignment with the transport strategy within the LTP. When considering the status of the SPD and the need for the Scheme to look beyond the current plan period to its design year (2042) it is the Applicant's position that it would be reasonable to take account of the updated housing and employment forecasts that supplement the JCS, as well as the potential for safeguarded land at North West Cheltenham to come forward post 2031.</p>
<p><b>Scheme Objectives</b></p>	<p>With specific reference to the Scheme Objectives the Applicant would note that, as was concluded in DS7 of the JCS, an all movements junction improvement at M5 J10 will contribute to the unlocking of all of the Strategic Allocations, however, when considering the three Scheme elements as a whole the Scheme's objectives reflect the more specific geographical location of its elements and the development which they facilitate. Taking each objective in turn their association with the Scheme elements can be summarised as follows:</p> <p><i>Support economic growth and facilitate growth in jobs and housing by providing improved transport network connections in west and north-west Cheltenham.</i></p> <p>The Scheme facilitates the development of allocated sites A4 and A7 that provide both housing and employment growth through the provision of improved transport network connections and a capacity that is able to absorb the additional traffic associated with the development sites.</p>

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	<p><i>Enhance the transport network in the west and north-west of Cheltenham area with the resilience to meet current and future needs.</i></p> <p>Through providing enough capacity to absorb the additional traffic associated with sites A4, A7 and the potential safeguarded land / future development sites the Scheme enhances the transport network for both the current and what is considered reasonable future identifiable needs given the need for the Scheme to look beyond the current JCS plan period (2031) to its design year (2042).</p> <p><i>Improve the connectivity between the Strategic Road Network (SRN) and the local transport network in west and north-west Cheltenham.</i></p> <p>The provision of an all-movements junction, the widening of the A4019 and the provision of the West Cheltenham link road improve connectivity across the County, allowing traffic to join and leave the M5 at Junction 10, in both a northerly and southerly direction, connecting the West Cheltenham development site with the SRN and mitigating the dual impacts on the A4019 of the all movements junction and the development of the North West Cheltenham site. This will in turn reduce the level of traffic travelling through already congested local roads around Cheltenham to and from Junction 11 in order to access the southbound M5 or the local area around Junction 10 when travelling north on the M5.</p> <p><i>Deliver a package of measures which is in keeping with the local environment, establishes biodiversity net gain and meets climate change requirements.</i></p> <p>The submitted Environmental Statement establishes that the impacts of the Scheme on the surrounding Environment fall within acceptable levels and that targets associated with BNG can be met.</p> <p><i>Provide safe access to services for the local community, including for users of sustainable transport modes within and to west and north-west Cheltenham.</i></p> <p>The provision of a bus lane, new and improved routes for pedestrians, cyclists and equestrians and the improvement of crossing facilities will ensure the Scheme provides safe access to services for the local community, including for users of sustainable transport modes.</p>

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	<p>In light of the policy support outlined above, when considering the Scheme’s design year of 2042 and the likelihood of future development coming forward, it is the Applicant’s position that the capacity study published as part of the Golden Valley SPD is a material consideration in the Scheme’s design development as well as the Examination of the DCO application as it supplements the information that informed the JCS at the time of its adoption.</p> <p>With regard to the Safeguarded land at North West Cheltenham, it should be noted that this was included in the Scheme’s assessment and design development as the most reasonable proxy to ensure that the Scheme was able to future proof the road networks’ resilience. This is in the context of the Scheme’s 2042 design year looking beyond the plan term of the JCS and that the nature of its safeguarding through the JCS suggesting that it was the most likely site to come forward in this time period. Whilst the Applicant recognises the uncertainty surrounding the Safeguarded land being brought forward and its inclusion within the Scheme assessment would have no bearing on the Scheme design other than to demonstrate that the design that unlocks Site Allocations A4 and A7 is also capable of accommodating the traffic associated with the Safeguarded land or any other equivalent development sites that come forward in relative proximity to the junction. Moreover, the Scheme has taken a deliberate stance against predetermining the release of the Safeguarded land through the absence of an access provision that has been afforded the Strategic Allocations.</p> <p>In relation to the Safeguarded land at West Cheltenham it is considered that the complications associated with the relocation of the Hayden Sewerage Works makes the site less likely to come forward by the Scheme’s design year of 2042, therefore it was discounted on that basis.</p>
<b>Need for the Scheme</b>	<p>As has been outlined above in relation to the policy support for the Scheme the need for the M5 J10 improvements was established through JCS DS7, JCS Policy SA1 and the associated policy documents, namely the IDP, the LTP and the Golden Valley SPD.</p> <p>The creation of an all movements junction at M5 J10 will result in induced traffic onto the A4019 in both directions i.e. from the junction into Cheltenham and from the Cheltenham to the SRN. The need for widening of the A4019 is intrinsically linked to the all movements junction as the improvements that are required are over and above those proposed by the developers for Strategic Allocation A4 in order to accommodate the increased throughput of traffic in both directions along the A4019.</p>

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	<p>When considering the West Cheltenham Link Road it is evident that it cannot be developed without the M5 J10 junction improvements and that both the Scheme objectives and the policy objectives outlined in the IDP, LTP and SPD cannot be met without the provision of both the link road and the all movements junction.</p> <p>As noted above Scheme Objectives 1, 2 and 3 all require improvements to the road network in both North West and West Cheltenham and to this end the Scheme cannot be considered as its component parts but as the Scheme as a whole. The Scheme seeks to unlock all dependent development at A4 and A7, as well as any other development sites facilitated by the design capacity, and the cumulative traffic generated as a result of that development cannot be brought forward in its entirety without the Scheme in situ, given the relatively lower total deadweight within the existing network capacity.</p>
<p><b>Alternatives to the Scheme</b></p>	<p>As been outlined above in relation to the policy support and need for the JCS transport evidence base outputs concluded that the Scheme is required to enable the full buildout of the JCS allocations. In this regard the Scheme seeks to unlock all dependent development at A4 and A7, as well as any other development sites facilitated by its design capacity. The cumulative traffic generated as a result of that development cannot be brought forward in its entirety without the Scheme in situ when considering the total deadweight within the existing network capacity.</p> <p>For North West Cheltenham, firstly the Applicant would draw the ExA’s attention to its response to the Rule 9 letter in relation to the clarification of the role of GCC in the DCO Examination (AS-055). In view of the Applicant’s response, it is important to distinguish between GCC as Applicant and GCC as County Highway Authority. On that basis the Applicant is unable to speak for the County Highway Authority in relation to the interested parties’ interpretation of the Highways Development Management consultation response [see RR-006 Appendix 4], however, the Applicant’s own view is that the consultation response also seeks S106 contributions to the M5 Junction 10 Improvement and that this supports the Applicant’s position that the Scheme is required in order to unlock the full build out of Strategic Allocation A4. This was also supported through the Grampian position taken by National Highways in their consultation response, which limits build out of the Elms Park development to 1,000 dwellings subject to the construction of the M5 J10 Improvements Scheme or an alternative scheme that provides equal or greater benefit. Notwithstanding the above it is acknowledged that it is for the developer of the Elms Park planning application to demonstrate its acceptability through the planning application process.</p> <p>With regard to the Safeguarded land, it should be noted that the options appraisal did consider any impacts on route alignments that could sterilise the safeguarded site, however, whilst the Scheme design can demonstrate the ability to absorb a greater</p>

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	capacity the design relates to the unlocking of Strategic Allocations A4 and A7 and the options appraisals associated with their facilitation.
<b>Access Provision</b>	<p>The Applicant has an established set of principles setting out the basis for addressing access arrangements for land adjacent to the Scheme in respect of any future development. Where there is a clear and active planning status of a development then the Applicant has sought, where it is feasible, to provide an access that might be able to be utilised by that development, thus enabling a co-ordinated design to be developed and avoiding the need for subsequent additional works to the proposed scheme. Where a proposed development or land has no planning status then the Applicant has sought to provide an access on equivalent terms that is currently secured. In some instances, this has resulted in an improvement over the existing situation in terms of both safety and the ease of access.</p> <p>As has been outlined above the Scheme has taken a deliberate stance against predetermining the release of the Safeguarded land at North West Cheltenham. Whilst the proposed design results in adequate capacity and would allow any future developer to tie into the Local Road Network (LRN) through the creation of an approved access the Scheme stops short of the provision of an access that has been afforded the Strategic Allocations, in accordance with policy SD5 of the JCS.</p>
<b>Funding</b>	The Applicant notes the matters raised regarding the developer contributions and the overall funding of the Scheme. Given the recent closure of the Junction 10 specific engagement with developers, highways and planning authorities on developer contributions and the need to consider the feedback received, which is ongoing, it is felt that it would be premature to provide a response on these matters at this time. It is proposed that further engagement with the relevant developers is undertaken in the coming weeks in order to further develop the contributions methodology with the aim being that an agreement can be reached on a more up to date position.

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