



Edwin Maund
The Planning Inspectorate
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6PN

AtkinsRéalis
Nova North
11 Bressenden Place
London
SW1E 5BY

OUR REFERENCE:
M5J10.JC.D7.CL

YOUR REFERENCE:
TR010063

Date: 30 October 2024

Dear Mr Maund,

Application by Gloucestershire County Council for an Order Granting Development Consent for the M5 Junction 10 Improvements Scheme: TR010063

Submission made by the Joint Councils pursuant to Deadline 7 (D7) of the Examination of the M5 Junction 10 Improvements Scheme

This covering letter is written on behalf of Gloucestershire County Council (GCC), including GCC in its role as the Local Highway Authority, Cheltenham Borough Council (CBC) and Tewkesbury Borough Council (TBC) as Local Planning Authorities (LPAs), together the Joint Councils (20047710). The Joint Councils are the host authorities for the GCC Major Projects Team ('the Applicant') M5 Junction 10 Improvements Scheme Development Consent Order (DCO) ('the Scheme').

This letter provides a summary of the Joint Councils' D7 submissions of which further details can be found within the following documents:

- Joint Councils Written Submission of case put orally at the Hearings held the week commencing 14 October 2024 – our document reference M5J10.JC.D7HS; prepared by AtkinsRéalis on behalf of the Joint Councils, dated 30 October 2024;
- Plan in Response to Issue Specific Hearing 4 (ISH4) Action Point item 23 – our reference GCCM5J10-ATK-ECU-ZZ-GS-GI-000004; prepared by AtkinsRéalis on behalf of the Joint Councils, dated 28 October 2024.

The Joint Councils have also reviewed the submissions made by the Applicant and other Interested Parties at D5. Where a review of an D5 submission does not warrant a separate document, these are captured within this letter.

Joint Councils Written Submission of case put orally at the Hearings held the week commencing 14 October 2024

The Joint Councils' written summary of the oral submissions made during ISH4 have been set out in the titled submission (our reference: M5J10.JC.D7HS) submitted at D7. This submission also comprises the Joint Councils' response to Action Point items arising from ISH4, as well as a follow-up response to an agenda item within ISH4. The following are the Action Point items and hearing agenda items that have been followed up by the Joint Councils:

ISH4 Action Point	Action By	Joint Councils' position at D7
Action Point 10 – Confirmation re. local flood authority position regarding flood mitigation requirements at Staverton Brook	JC	Please refer to Section 2.8 of the titled submission.
Action Point 18 – Position Statement regarding ability of S106 monies to be sought for a highway scheme that has already commenced	Applicant and JC	Please refer to Section 2.8 of the titled submission.
Action Point 20 – JC to submit CIL Funding Policy agreed once relevant Joint Committee meeting has taken place 12 November 2024	JC	Please refer to Section 2.8 of the titled submission. The Joint Councils are committed to provide an update on this Action Point item the first available deadline after the Joint Committee's meeting on 12 November 2024.
Action Point 21 – Provide updated CIL funding figure secured	JC	Please refer to Section 2.8 of the titled submission.
Action Point 23 – Provide plan(s) showing location of planning applications submitted by signatures of 'Letter of in Principle Support' [REP5-031]	JC	Please refer to Section 2.8 of the titled submission and Plan in Response to ISH4 Action Point item 23.
Action Point 25 – JC LHA consideration of ability of DCO agricultural access proposal into Bruton / Counsell (and adjacent land plots) to provide safe and suitable access (including possible congestion effects on A4019)	JC	Please refer to Section 2.8 of the titled submission.
Action Point 26 – Updated position regarding Article 7	JC / Applicant	Please refer to Section 2.8 of the titled submission.
Action Point 32 – Update re. Mr Badham's property, acceptability of noise barriers and mitigation. Is the property considered as a non-	Applicant and JC	Please refer to Section 2.8 of the titled submission.

designated heritage asset. What are the implications of this?

Action Point 34 – Position regarding ability to include vegetation on acoustic barriers (both sides) within space available? Would this provision be acceptable to the LHA including maintenance etc?

Applicant and JC

Please refer to Section 2.8 of the titled submission.

ISH3 agenda item 3(iii) – The ExA will seek an explanation from the Applicant on the Active Travel Provision within the Scheme and the views of the JC on their conformity or otherwise Local Plan policy in line with NPSNN paragraph 5.211.

N/A

Please refer to Section 2.8 and Appendix A of the titled submission.

Joint Councils' comments on the D5 submissions made by the Applicant and other Interested Parties

The Joint Councils have reviewed the submissions made by the Applicant and other Interested Parties at D5 on 1 October 2024. In summary, the Joint Councils have no specific comments on the submissions made by other Interested Parties but would particularly like to highlight our comments on the following submission items made by the Applicant which are set out below.

Applicant Response to Examining Authority's Second Written Questions (ExAQ2) [REP5-027]

The Joint Councils have reviewed [REP5-027] and all other submission items from the Applicant that support their Response. The Joint Councils are broadly satisfied with the responses made by the Applicant. Where the Joint Councils have further comments on the Applicant's responses, these are provided in Table 1 of the Appendix of this letter.

Applicant Response to Interested Parties D4 Submissions [REP5-028]

The Joint Councils have reviewed [REP5-028]. The Joint Councils noted that Section 4 comprises the Applicant's Response to the following submission items made by the Joint Councils at D4:

- Cover Letter [REP4-048], which comprises the Joint Councils' comments on the D3 submissions made by the Applicant and other Interested Parties
- Joint Councils' written summary of the oral submissions made during Issue Specific Hearing 3 (ISH3) and Compulsory Acquisition Hearing 1 (CAH1) [REP4-048c]

The Joint Councils broadly agree with the responses made by the Applicant in [REP5-028]. Where the Joint Councils have further comments on the Applicant's responses, these are provided in Table 2 of the Appendix of this letter.

Environmental Statement (ES) – Appendix 10.8: Geology and soils chapter figure [REP5-007]

The Joint Councils have reviewed [REP5-007]. The only chapter update is the production of the additional figure - no changes / updates to the chapter text by the looks of it. Figure 10.3a is helpful to show the context of the scheme and surroundings with respect to BMV land and loss of BMV land through the scheme. The figure also addresses one of the Joint Councils' previous comments about the agricultural land classification associated with the Elms Park Development.

Flood Risk Impacts Technical Note [REP5-021]

The Joint Councils have reviewed [REP5-021]. The Joint Councils' flood risk specialist raised a question on the sensitivity testing during ISH4. The Joint Councils have accepted the Applicant's response during ISH4 and have no additional comment on [REP5-021]. Please refer to paragraphs 2.7.2 to 2.7.4 of the Joint Councils Written Submission of case put orally at the Hearings held the week commencing 14 October 2024 (our reference: M5J10.JC.D7HS).

Other submissions made by the Applicant at D5

The Joint Councils have no specific comments to make in response to the other submission items from the Applicant.

Joint Councils' comments on the Technical Note on re-routing of traffic during slip road closures [AS-080]

The Joint Councils have engaged with GCC's Traffic Manager with regard to [AS-080] dated 9 October 2024. GCC's Traffic Manager has reviewed the document and makes the following comments:

"This is going to be disruptive, the signage and media messaging needs to be spot on, if not then the centre of Cheltenham will become gridlocked. The A4019 area is also grim at the best of times if lights are erected, so there will be an immense amount of pressure at this location.

Not sure how this is going to be communicated to the racecourse either, as this is the main route in on race days. The racecourse will need to add additional messaging (on their sites) asking people to use alternative transport if possible, such as the train.

Messages asking people to stagger journeys etc will be useful and to avoid peak travel if possible."

Updates on the Joint Councils' Response to Consultation on Proposed Changes to the Scheme

The Joint Councils have responded to the Applicant's Change Applications Consultation on 25 October 2024. The Joint Councils look forward to our responses being considered in the Applicant's Consultation Statement to be submitted at D8 on 5 November 2024.

Following from the submission of the response, the Joint Councils would like to provide an additional comment from the County Archaeologist on Chapter 12 Cultural Heritage of the Change Application 2 Environmental Statement Addendum [AS-093]:

“No comments on addendum as no changes to Order Limits or to previously identified impacts in ES. Geophysical survey (full report yet to be produced) has just been completed over much of the Order Limits (the exception being where no physical impact is expected). It is GCC’s Archaeology Team understanding as of 29 October 2024 that Galliford Try are continuing to work with their appointed archaeological contractor to produce trial trenching proposals for discussion/ review and proceed with this programme of works once a project design has been agreed with the Joint Council’s archaeological advisors. The trenching is now likely to be in the new year, weather permitting. This trenching will ground truth the geophysical survey results and provide additional information on the likely character, extent, preservation, depth, and significance of archaeological remains within the order limits and inform mitigation proposals.”

Updated Funding Statement

The Joint Councils are aware that the Applicant is required to submit an updated Funding Statement [REP6-005] at D6 on 28 October 2024. The Joint Councils would like to reserve the right to review and comment on the submission at subsequent deadlines. For the Joint Councils’ position on the Joint Core Strategy (JCS), CIL funding and section 106 contributions towards the Scheme, please refer to the Joint Councils’ Planning Statement [REP4-048b] and the Joint Councils’ Letter dated 2 October 2024 outlining In Principle Support for the Scheme [AS-081].

Statement of Common Ground (SoCG) with the Applicant

The Applicant’s SoCG Joint Councils [REP4-022] submitted at D4 reflects the latest position of the SoCG between the Joint Councils and the Applicant. A meeting between the Joint Councils and the Applicant to discuss updates to the SoCG has been scheduled for early November. The Joint Councils would like to reiterate their position in support of the Scheme in principle and will continue the discussions of outstanding matters with the Applicant during the Examination to work towards agreement wherever possible.

Documents submitted by the Joint Councils at D7

In summary, please find below a list of documents which form the Joint Councils’ submission for D7 of the Examination of the Scheme:

- Joint Councils Written Submission of case put orally at the Hearings held the week commencing 14 October 2024 – our document reference M5J10.JC.D7HS; prepared by AtkinsRéalis on behalf of the Joint Councils, dated 30 October 2024;
- Plan in Response to Issue Specific Hearing 4 (ISH4) Action Point item 23 – our reference GCCM5J10-ATK-ECU-ZZ-GS-GI-000004; prepared by AtkinsRéalis on behalf of the Joint Councils, dated 28 October 2024; and
- This Covering Letter for the submission, which includes the Joint Councils’ comments on the D5 submissions made by the Applicant and other Interested Parties.

If you require any further information, please do not hesitate to get in contact via the M5 J10 Joint Councils project team: M5J10JointCouncils@atkinsrealis.com

Yours sincerely,



Lewis Oliver

Associate Planner for and on behalf of The Joint Councils

APPENDIX

Appendix: Joint Councils comments on the D5 submissions made by the Applicant and other Interested Parties

Table 1 – Joint Councils’ comments on the Applicant’s Response to ExAQ2 [REP5-027]

ExAQ2 No.	Question	Joint Councils’ Comment on the Applicant’s Response
Q1.0.4	<p>Equalities Act</p> <p>In response to Q1.0.10 the Applicant reiterates that a pack of information was provided to occupiers of the Traveller site and a cover letter was provided in 6 different languages which provided contact details.</p> <p>(i) Did either the Traveller Liaison Support Officer or the Friends, Families and Travellers Charity advise that engagement in writing was the most appropriate approach to engage constructively with the residents?</p> <p>(ii) Did the Applicant visit the site in order to seek to create a constructive approach which facilitated consultation without relying on written communication?</p> <p>(iii) Was the Applicant advised not to visit the site, or undertake a review that indicated it was not safe to do so?"</p>	<p>It would appear that in general terms the Applicant has tried to follow the correct procedures, including liaison with GCC's Traveller Liaison Support Officer, to determine the best approach to engage with, and make the occupants of the traveller site aware of the proposals and consultation process. The key question appears to be whether the decision made by the Applicant, having considered the safety advice given by GCC not to attend the site without police support on the basis of a previous incident, potential escalation and risk to safety, and then not to attend with police support was the correct one. Were the police consulted about whether visiting the site with police support in light of the associated risks would be the right thing to do for all parties (Applicant, police, travellers) in this instance? If the police advised against visiting the site even with their support then the Applicant could do no more. If the police weren't consulted or the Applicant declined the opportunity to visit the site with the offer of police support, it becomes a question of whether this was the appropriate thing to do when weighing up the benefits and alternative options for issuing the consultation pack, against the obvious risks to personal safety (bearing in mind what the Applicant will likely have encountered during previous experiences with the traveller site and/or in similar situations elsewhere, and previous decisions made when assessed against the specific risks identified).</p>
Q6.0.5	<p>Article 7 Planning Permission</p> <p>(i) Can each party provide their preferred wording for this Article, if there is not resolution to the disagreement referenced in the response to FWQs?</p> <p>(ii) Can the Applicant provide reference to a precedent which has been agreed by the SoS?</p>	<p>Please refer to paragraphs 2.5.2, 2.5.3 and 2.8.14 of the Joint Councils Written Submission of case put orally at the Hearings held the week commencing 14 October 2024 (our reference: M5J10.JC.D7HS). The Joint Councils have agreed with the Applicant’s legal teams that Articles 7(2) and 7(3) will be deleted from the dDCO.</p>
Q6.0.8	<p>Article 41 Defence to Proceedings in respect of Statutory Nuisance</p> <p>The Joint Councils sought amendments to this article such that the defence should only arise for the construction period.</p> <p>(i) Can the Applicant provide greater clarity and any legal justification for the defence continuing for any subsequent maintenance period or during the operation of the development?</p>	<p>The Joint Councils have agreed with the Applicant’s legal teams that the wordings of Article 41 drafted by the Applicant will remain.</p>
Q11.0.1	<p>Acoustic Barriers</p> <p>(i) Can the Applicant confirm their position with respect to the D3 request from the JC that LV6 of the REAC be modified to explicitly include the objective of implementing a vegetated solution for the barriers?</p> <p>(ii) In the event this is not included it would appear that the Landscape and Visual Impact Assessment Chapter should be updated to assess the impacts of a non-vegetated design solution. If the Applicant does not agree that this is the case, please explain the reasons why this would not be appropriate?</p> <p>(iii) It would appear there is very limited space to allow planting on both sides of the barriers along the A4019. Can GCC confirm as Highway authority they agree to landscape planting to screen the fences within the highway, and that appropriate space is available for maintenance?</p>	<p>For sub-question (iv), with regards to noise, the barriers will provide a benefit for noise sensitive receptors in a Noise Important Area. The barriers do not require vegetation for the acoustic performance, however, the acoustic performance will not be compromised through adding vegetation to improve visual impacts.</p>

ExAQ2 No.	Question	Joint Councils' Comment on the Applicant's Response
	(iv) Can the Applicant point out how the effect on residential properties has been assessed where barriers are proposed and the significance or otherwise of the effect created upon these residential properties and the balance to be struck between any visual harm and acoustic benefit.	
Q12.0.1	Stoke Orchard – Construction Stage Noise Impacts Please can the Applicant confirm that in the absence of secured mitigation the proposal would comply with the requirements of the Noise Policy Statement for England (March 2010)?	Stoke Orchard is more than 300m from works and no construction noise impacts are therefore anticipated. The Applicant has considered the following operational noise mitigation: <ul style="list-style-type: none"> Noise barriers - unfortunately this is not effective, since there is driveway access to properties along Stoke Road. Quiet road surface - unfortunately this is not effective, since the speed along Stoke Road is below 75 km/h where engine noise dominates and a quiet road surface mitigating tyre/road noise is not effective. Noise insulation – Stoke Orchard is beyond 300m from the physical works of the Scheme and therefore not eligible for noise insulation under the Noise Insulation (Amendment) Regulations 1988. The Joint Councils' opinion is that this shows the Applicant has considered acoustic measures to avoid, mitigate and minimise noise as far as reasonably practicable in accordance with the aim of the Noise Policy Statement in this situation. It is now also understood that the separate speed calming Scheme is being considered as part of mitigation for the M5 Junction 10 Scheme, which will likely remove the significant effects at Stoke Orchard.

Table 2 – Joint Councils' Comments on the Applicant Response to Interested Parties D4 Submissions [REP5-028]

Response Reference	Applicant's Response at D5 (verbatim)	Joint Councils' Comments on the Applicant's Response at D7
Joint Councils' Comments on the Applicant Response to ExAQ1 [REP3-043]		
048-07	ExAQ1 Q1.0.10 Equalities Act Please refer to the Applicant's response to ExQ2 1.0.4(iii) (TR010063/APP/9.77). The Applicant was advised by GCC's Traveller Liaison Support Officer not to visit site without police support due to history of the site and serious incident that occurred a few years previous. Having received this advice, the Applicant considered that visiting site with police support would not result in constructive engagement and therefore a decision was taken to rely on the information pack served.	Refer to the Joint Councils' comment on the Applicant's response to ExAQ2 Q1.0.4 in Table 1 of this Appendix.
048-12	ExAQ1 Q10.0.4 Best and Most Versatile Agricultural Land A figure has been submitted at Deadline 5 as part of an update to Appendix 10.8 [TR010063 APP 6.15] showing the location of the best and most versatile (BMV) agricultural land in the area surrounding the Scheme. As also identified by the Joint Councils, this figure highlights that BMV cannot be avoided by any of the Link Road corridor options.	It is a good figure that shows the context of the Scheme and surroundings with respect to BMV land and loss of BMV land through the Scheme. Ultimately, as the other comments say the BMV land cannot be avoided so either loss of BMV land or cancel the Scheme. Refer to page 4 of this letter for the Joint Councils' comment on the updated ES Appendix 10.8.
Joint Councils' Comments on the Applicant's Response on D2 Submissions [REP3-044]		
048-23	Paragraph 4.3.2 of the Water Framework Directive (WFD) Compliance Assessment [REP3-028] The Applicant proposes an update to the WFD assessment to add clarity to the text in this statement. The text will be updated from ' <i>Preliminary design calculations estimated the stream power to be approximately 40 Wm-2 based on the 50% (1 in 2 year) annual exceedance probability (AEP) and 90 Wm-2 for the 1% (1 in 100 year) plus climate change AEP. Although this alone may not necessitate the requirement for bank protection, information gathered from field surveys has shown the watercourse to</i>	The Joint Councils' water specialist disagrees that Brooks would classify the stream power of River Chelt as high to very high, although the point that it exceeds 35W/m2 is accepted. The deleted text is appropriate, and the remainder of the paragraph now reads well.

Response Reference	Applicant's Response at D5 (verbatim)	Joint Councils' Comments on the Applicant's Response at D7
	<p><i>be eroding both laterally and vertically meaning the river is a likely to be a high energy system and the need for bank protection is likely, along all or part of the river banks through the structure.'</i></p> <p>To an updated paragraph as follows:</p> <p><i>'Preliminary design calculations estimated the stream power to be approximately 40 Wm-2 based on the 50% (1 in 2 year) annual exceedance probability (AEP) and 90 Wm-2 for the 1% (1 in 100 year) plus climate change AEP. Based on Brookes (1986) this suggests the watercourse is high to very high energy with the potential to cause local to widespread erosion. Although this alone may not necessitate the requirement for bank protection, information gathered from field surveys has shown the watercourse to be eroding both laterally and vertically meaning the need for bank protection is likely, along all or part of the river banks through the structure.'</i></p> <p>Brookes, A (1986) River Channel Adjustments downstream from channelization works in England and Wales., Earth Surface Processes and Landforms., Volume 12., 337-351</p> <p>Brookes, A (1987) The distribution and management of channelized streams in Denmark., Regulated Rivers., 1, 3-16</p> <p>The Applicant will make this change in the final submission of the WFD assessment prior to the end of examination.</p>	<p>Ongoing engagement is noted. The Applicant should do everything possible to find a mutually acceptable solution that minimises impacts on the businesses.</p>
Joint Councils' Written Submission of case put orally at the Hearings held the week commencing 12 August 2024 [REP4-048c]		
048c-030	<p>ISH3 agenda item Landscape (i) – para 2.6.5</p> <p>The Applicant confirms that as per item LV6 of the REAC [REP4- 018], the Applicant will consult with the LPA and directly affected receptors on options for the final design of noise barriers so that they provide visual amenity and/or biodiversity values as well as noise abatement.</p> <p>With regards to the achievement of a vegetated design for the noise barriers, the Applicant has confirmed with the Joint Councils (item 9.5 of SoCG ref REP1-034) that there is room for at least climbing plants at the noise barrier locations, in some areas there may be room for narrow hedging for example</p> <p>This does not mean that a vegetated design is the intended final design for the noise barriers. It may be that a simple timber board or artwork is chosen rather than planting.</p> <p>The visual impact assessment of the noise barriers, as presented in ES Chapter 9 (Landscape and Visual) [REP1-016] has assumed a 2m high non-specific material barrier design for the noise barriers (paragraph 9.15.9). The final design for the noise barriers will be determined through consultation with the LPA and directly affected receptors.</p>	<p>The Joint Councils understand the Applicant's response and position in this regard, i.e. that the final design may not be a vegetative solution and will be determined through consultation, where there will be opportunity for Interested Parties to express their views on an acceptable solution.</p>
048c-033	<p>ISH3 agenda item Landscape (i) – para 2.6.8</p> <p>The Applicant disagrees on the suggestion from the Joint Councils that there is ambiguity.</p> <p>In summary:</p> <p>ES Chapter 9 [REP1-016] assumes a 2m high non-specific material barrier design for the noise barriers (paragraph 9.15.9).</p> <p>SoCG item 9.5 [REP1-034] has confirmed there is room for climbing plants at the noise barrier locations.</p> <p>REAC item LV6 [REP4-018] states that the LPA and affected receptors will be consulted on the final design of the noise barrier.</p>	<p>The Joint Councils understand the Applicant's response and position in this regard, i.e. that the final design may not be a vegetative solution and will be determined through consultation, where there will be opportunity for Interested Parties to express their views on an acceptable solution.</p>

Response Reference	Applicant's Response at D5 (verbatim)	Joint Councils' Comments on the Applicant's Response at D7
	<p>The Applicant's position therefore is that the preliminary design for the noise barriers is a 2m high structure with no material or finish specified. The details of the material to be used and the finish, will be determined at final design following consultation with the LPA and affected receptors.</p>	
048c-070	<p>Joint Councils follow-up response on ISH3 agenda item 4(ii) – para 2.8.14</p> <p>Appendix L of the Traffic Forecasting Report (REP4-020) contains the following output plots from the strategic modelling for Scenario Q (scenario with JCS dependant development but without the Scheme) in 2042:</p> <ul style="list-style-type: none"> • Traffic flow differences - Scenario Q vs Scenario P and Scenario R vs Scenario Q, for both AM and PM peak period. • Vehicle delay differences - Scenario Q vs Scenario P and Scenario R vs Scenario Q, for both AM and PM peak period. • Demand over capacity ratios (V/C) - Scenario Q. <p>Appendix L has been resubmitted at Deadline 5 with demand over capacity ratio (V/C) plots from the Strategic modelling for Scenario Q in 2027 during both the AM and PM peak periods added.</p> <p>Plans showing the connected and wider cycle network to support the WCHAR report has been submitted at Deadline 5 (TR010063/APP/9.80).</p>	<p>Further comments from the Joint Councils and ongoing discussion with the Applicant are taking place.</p>
048c-071	<p>Joint Councils follow-up response on ISH3 agenda item 4(ii) – para 2.8.15</p> <p>In response to National Highways concerns regarding validation of journey times in the base year strategic traffic model, the Applicant has undertaken a sensitivity test with relevant parameters adjusted such that the two westbound journey time routes in the base year model of concern meet the TAG validation criteria at segment level whilst maintaining TAG validation compliance for all other aspects of the model.</p> <p>The results of this sensitivity test are reported in a Technical Note submitted at Deadline 5 (TR010063/APP/9.79).</p> <p>A comparison of the outputs from the 'sensitivity test' base year model with the DCO base year model shows minimal differences between them. This demonstrates that the modelled routing or assignment of traffic across the road network is reliable and the model outputs are not materially affected by whether the modelled westbound journey time along the A4019 meets the TAG validation criteria in comparison to observed journey times. Therefore, the strategic traffic modelling used to assess the Scheme is both robust and fit for purpose.</p>	<p>Further comments from the Joint Councils and ongoing discussion with the Applicant are taking place. The Joint Councils noted the Applicant's submission of the Sensitivity Tests Technical Note [AS-078].</p>
048c-072	<p>Joint Councils follow-up response on ISH3 agenda item 4(ii) – para 2.8.16</p> <p>The Applicant continues to maintain that it is not necessary to produce a separate transport chapter within the ES. It was not requested as part of the Scoping Opinion (August 2021). Please see Applicant response to the Joint Councils submission at Deadline 2 (REP3-044) references 39.22 to 39.27, for the Applicant's position on this.</p>	<p>The additional reports and technical notes provided by the Applicant in August and September 2024 are the information required that would otherwise be found within a separate transport chapter. These are as follows:</p> <ul style="list-style-type: none"> • 9.74 Need for Scheme Technical Note [REP4-042] • 9.65 Cumulative Effects Technical Note [REP4-034] • 9.53 Multimodal Study [REP3-053] • 9.52 West Cheltenham Link Road Route Corridor Assessment [REP3-052] <p>The Joint Councils have no further comments.</p>