

M5 Junction 10 Improvements Scheme

Applicants Response to Issue Specific Hearing 4 (ISH4) Action Points

Rules 8 (k)

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

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

Applicants Response to Issue Specific Hearing 4 (ISH4) Actions Points

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1. Introduction

1.1. Purpose of document

- 1.1.1. The purpose of this document is to provide the Applicant's response to the Action Points raised at the Issue Specific Hearing 4 (ISH4) on Traffic and Transport, Funding and Environmental Matters held on the 15 and 16th October 2024 (EV10-002). This document should be read in conjunction with the Applicant's Written Summary of Oral Submission at ISH4 (TR010063/APP/9.83) also submitted at Deadline 7.

2. Applicant response to actions arising from the ISH4

Action	Description	Applicant Response
1	Differences in the retail park junction and on Haden Lane between the GEH figure and the figure in the model –more detailed written explanation sought.	<p>The GEH is a statistical formula used in traffic engineering, traffic forecasting, and traffic modelling to compare two sets of traffic volumes to establish whether the differences are ‘statistically’ significant. The GEH formula gets its name from its inventor Geoffrey E. Havers. Its mathematical form is similar to the chi-squared test, but it is not a true test of the statistical significance of differences between two datasets. However, it is an empirical formula that is an acceptance criterion in the Department for Transport (DfT) Transport Analysis Guidance (TAG) for analysing the validity of travel demand forecasting models.</p> <p>When assessing the validity of traffic models in the "baseline" scenario, a GEH of less than 5.0 is considered a good match between the modelled and observed hourly volumes (flows of longer or shorter durations should be converted to hourly equivalents to use these thresholds). According to TAG, 85% of the volumes in a traffic model should have a GEH less than 5.0. GEHs in the range of 5.0 to 10.0 may warrant investigation.</p> <p>Figures 2-1 to 2-6 in M5 J10 Traffic Modelling Sensitivity Test - Forecast Models (AS-078) show GEHs of less than five for most of the road network. This indicates that the differences between the sensitivity test and DCO modelled traffic forecast flows under both Scenarios P & R in 2024 are not generally statistically different and the traffic modelling underpinning the assessment of the Scheme is therefore robust. The exceptions to this are as follows:</p> <ul style="list-style-type: none"> • Hayden Road westbound between the A4019 and the B4634 – Scenario P during the AM and PM peak hours and Scenario R during the inter-peak hour • A4019 westbound between Hayden Road and the B4634 – Scenario P during the AM and PM peak hours • B4634 southbound between the A4019 and Hayden Road – Scenario P during the AM and PM peak hours

Action	Description	Applicant Response
		<p>This indicates that the choice of route that drivers take westbound from the A4019 to the B4634 is very locally sensitive to westbound delays on the A4019 approaching its junction with the B4634 – Gallagher Junction. With more or less westbound drivers heading for the B4634 choosing Hayden Road, as an alternative to staying on the A4019 between its junctions with Hayden Road and the B4634, depending on delays on the A4019 approaching the Gallagher Junction.</p> <p>The delay on the A4019 approaching the Gallagher Junction is determined by a combination of the assumed traffic speed approaching the junction and the traffic signal timings (red light stop time) at the junction. The traffic signal timings will operate on a demand dependant basis and will not therefore be fixed. The signal timings will optimise in real time in response to traffic demand to minimise overall delay at the junction. The traffic modelling used to assess the Scheme mimics this using computer simulation, optimising the timings based on forecast traffic demand. The assumed traffic speeds on the road network that are used for Scheme forecast years traffic modelling are based on best practice guidance contained in TAG.</p> <p>Whereas the traffic speed on the A4019 westbound approaching the Gallagher Junction used for the sensitivity test has been carried over from the base year sensitivity test, in which the westbound traffic speeds on the A4019 has been artificially adjusted such that the modelled base year journey times meet TAG validation criteria against observer journey times. Thus, this traffic speed is unlikely to reflect future traffic speeds under different future operating conditions due to increased traffic demand and changes to the road layout delivered by the Scheme. Consequently, the westbound traffic speed on the A4019 used for the future years traffic modelling to assess the impact of the Scheme (as reported in the Transport Assessment – REP4-021) represent a better prediction of future speeds in this location than those used for the sensitivity test. Furthermore, the signal timings at junctions on the A4019 could if necessary be adjusted in the future to achieve the desired distribution of westbound traffic between Hayden Road and the A4019.</p> <p>In summary, the following conclusions can be drawn from the sensitivity test:</p> <ul style="list-style-type: none"> Adjusting the westbound journey times on the A4019 in the base year strategic traffic model such that they better meet TAG validation criteria against observed journey times results in only very local changes in the routing of traffic on the road network, with immaterial changes elsewhere.

Action	Description	Applicant Response
		<ul style="list-style-type: none"> Local route choice for westbound drivers heading for the B4634 between the Kingsditch and Gallagher junctions (via either the A4019 or Haydens Road) is very sensitive to signal timings at the Gallagher junction in the base year and in the future forecast years. Manually applying changes in journey times to the forecast year traffic models to better match observed journey times, as reflected in the base year sensitivity test, is unlikely to accurately reflect future journey times under different future operating conditions arising from increased traffic demand in combination with changes to the road layout delivered by the Scheme. Especially as the traffic signals will operate on a demand dependant basis, which is mimicked by the future forecast year traffic modelling for the Scheme. Consequently, the westbound traffic speeds on the A4019 used for the future years traffic modelling to assess the impact of the Scheme, as reported in the Transport Assessment, are a better prediction of future speeds in this location, and thus the likely route choice for traffic, than those used for the sensitivity test.
2	Active Travel Provision and the relationship to local plan policy and NPSNN para 5.211 – Applicant will collate information into written note	Please see Appendix A for Applicant’s response to Action Point 2.
3	Note on traffic flow increases leading to Noise consequences relative to traffic figures – from Table 2-1 in AS- 080.	<p>The traffic flow headrooms on the temporary signposted diversion routes that would need to be exceeded to trigger a significant noise impact (presented in Table 2.1 Re-routing of traffic during slip road closures Technical Note - AS-080) have been derived using ‘The Calculation of Road Traffic Noise-1988’ (CRTN) Calculation methodology. This predicts the basic noise level at 10m (BNL) using the traffic flow, percentage of HDV and average speed.</p> <p>In accordance with the Design Manual for Roads and Bridges (DMRB) LA111 ‘Noise and Vibration’, the threshold for a minor, but not significant, impact is 1.0 dB above the Do Minimum levels. A moderate impact is reported when the change is 3.0 dB to 4.9 dB above the Do Minimum levels, with a major impact being 5.0 dB or above. These values are provided in Table 3.17 of DMRB LA111 'Noise and Vibration' 2020 Revision 2.</p> <p>Both moderate and major noise impacts are considered to be a significant adverse effect if there are noise sensitive receptors located within 25m of the edge of that road link, and if that impact</p>

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		<p>would occur for either 10 or more days or nights in any 15 consecutive days or nights; or a total number of days exceeding 40 in any 6 consecutive months.</p> <p>On the assumption that speed and HGV composition remain the same when the diversion routes are in place, the number of vehicles would need to increase by 25% for a 1dB increase in noise (minor impact, not significant), would need to double for a 3dB increase (moderate impact and potentially significant) and would need to more than triple (x 3.16) for a 5dB increase (major impact and potentially significant).</p>
4	Any concerns on safety, severance, congestion etc. in the event people follow the promoted signed diversion route.	<p>In considering the potential impacts of the promoted diversion route on safety, severance and congestion it is the Applicant's position that only a small proportion of drivers would follow the signed diversion routes for the following reasons:</p> <ul style="list-style-type: none"> • Many users have extensive local knowledge as a result of the existing junction having only north facing slips. • It is increasingly common for drivers to follow Satnav recommended routes rather than diversion signs. This was evident during the M25 J10 closures earlier this year where, despite an inability to force drivers to follow the diversion signs, drivers were urged to follow the promoted diversion routes due to issues experienced during the previous closure of the A3 and traffic moving to local villages. • The additional traffic congestion and delay, caused by the slip road closures, would most likely cause drivers to find alternative, less congested routes as traffic volumes achieve equilibrium across the network. <p>Furthermore, not all traffic would need to follow the diversion routes over the entire length of the signposted routes, with the ultimate destinations of the diverted traffic determining which sections of the routes are followed. It is also highly likely that there would be a suppression of demand during construction of the Scheme, where a proportion of people would choose not to make non-essential / discretionary journeys or to re-time their journeys to less busy times.</p> <p>Strategic traffic modelling undertaken to assess the impact of the temporary closures of the slip roads at M5 Junction 10 during construction of the Scheme (as reported in the Transport Assessment – REP4-021, including Appendix M – Construction Phase Figures – APP-143),</p>

Action	Description	Applicant Response
		<p>indicates that:</p> <ul style="list-style-type: none"> • Up to 50% of the traffic diverted from the closure of the M5 junction 10 southbound off-slip road would follow the signposted diversion route and use the M5 junction 11 southbound off-slip, with the proportion varying by the time of day. • Up to 30% of the traffic diverted from the closure of the M5 junction 10 northbound slip road would follow the signposted diversion route, with the proportion varying by the time of day. <p>When considering the conclusions of the traffic modelling that supports the Scheme it is evident that there would be adverse and beneficial impacts on severance, amenity, and safety. These effects that arise as a result of the changes in traffic modelled (as described above) are outlined in the submitted ES Chapter 13 (Population and Human Health) [REP3-022].</p> <p>The human health assessment within ES Chapter 13 (Population and Human Health) [REP3-022] explores the impacts of the Scheme on determinants of human health including landscape amenity; the severance/separation of communities from green/open space, healthcare, educational and community facilities; and the risk of injuries and death (safety information).</p> <p>With regards to the effects on these determinants that arise from the changes in traffic caused by the closure of both of the slip roads for example, minor adverse effects on access and severance, as well as landscape amenity, are reported at the road connecting Elmstone Hardwick with Uckington over the M5, and at Piffs Elm Road/Boddington Road, due to increases in traffic in these locations. Minor beneficial effects in terms of accessibility and reduced severance, as well as landscape character are reported along the A4019, as a result of a decrease in traffic flows along this road for the duration of the slip road closures.</p>
5	NH will check policy position regarding 'optimum solution' and PCF/DMRB design process and include in their post hearing summary.	Not for Applicant
6	Applicant and NH to have a conversation and to discuss how scheme has been progressed and whether other documents need to be shared.	The Applicant has endeavoured to develop the Scheme in partnership with National Highways and has followed an iterative process to identify an appropriate solution that seeks to adhere to the principles of minimising adverse impacts whilst meeting the project objectives, in full accordance

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		<p>with the National Highways' Project Control Framework (PCF) process and its predecessor – TD37/93 Scheme Assessment Reporting.</p> <p>TD37/93 was withdrawn in March 2020, and replaced by the National Highways PCF process during the evolution of the Scheme.</p> <p>National Highways has seen, and signed-off from a governance perspective, all the relevant documents produced in accordance with the PCF process and its predecessor (TD37/93), including:</p> <ul style="list-style-type: none"> • Technical Appraisal Report (TAR) • Staged Overview Assessment Report (SOAR), which replaces and combines the Option Assessment Report (OAR), the Technical Appraisal Report (TAR) and the Scheme Assessment Report (SAR) previously required by TD37/93. <p>The Applicant discussed the above with National Highways after ISH4 and again provided these documents for National Highways review.</p> <p>The Environmental Statement (ES) now performs the function of the previously required Route Development Report (RDR), that would have incorporated the Environmental Impact Assessment (EIA) and confirmed the preferred scheme for the Preferred Route Announcement (PRA).</p> <p>Furthermore National Highways has been party to, and commented on, all statutory, non-statutory and public consultation during evolution of the Scheme. Also, as a statutory consultee for the Joint Core Strategy (JCS), National Highways will have seen the JCS Transport Strategy Evidence Base (REP3-049), including supporting traffic modelling, and contributed to the Examination in Public (EiP) of the JCS prior to its adoption.</p> <p>The JCS process looked at a range of scenarios with different combinations of interventions which included scenarios with greater or lesser improvements for public transport and active modes of transport. These were tested through public examination. The conclusion reached was that the Scheme was in principle the one that needed to come forward (Scenario DS7), i.e. the need for south-facing slip roads at M5 Junction 10 and the West Cheltenham Link Road. Therefore, the development of the Scheme was undertaken in the context of the principle of Scheme having been</p>

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		<p>previously established by adoption of the JCS. Therefore, the Scheme alternatives reported in Chapter 3 of the ES (APP-062) were considered within the policy context of the principal elements of the Scheme having been predetermined by JCS policy.</p> <p>The transport evidence base for the JCS represents the equivalent of PCF Stage 0.</p> <p>The need for the Scheme and its principal elements were confirmed by the traffic modelling and assessment undertaken for the Housing Infrastructure Fund (HIF) application and Outline Business Case (OBC) Traffic Forecasting Report (Appendix C - Applicant Written Submissions of Oral Case for Issue Specific Hearing 1 (ISH1) - REP1-046).</p> <p>For the equivalent of the PCF Stage 1 process, a total of six options for the configuration and location of an all-movements junction were considered and evaluated against multiple criteria covering engineering, traffic impact, road safety, environmental, land-take and other relevant considerations. This included consideration of a dumb-bell arrangement, un-signalised gyratory and junctions located to the north or south of the current junction, utilising the existing bridge over the M5. Where appropriate, strategic traffic modelling was undertaken to test the alternatives considered, with the results of the traffic modelling informing the option selection process.</p> <p>This stage of work was reported in the TAR which recommended taking forward two options for PCF Stage 2.</p> <p>Following production of the TAR, an additional option was added to the two options recommended in the TAR for PCF Stage 2. These three options were subject to non-statutory public consultation and were evaluated using multiple cross-disciplinary criteria, with the evaluation taking account of feedback from the public consultation.</p> <p>The PCF Stage 2 work was reported in the SOAR, which recommended a single preferred scheme for the Preferred Route Announcement. At this stage the Scheme incorporated an un-signalised, two-lane gyratory.</p> <p>For PCF Stage 3, the traffic modelling was updated in accordance with updated TAG which resulted in significantly more traffic demand at the junction. This triggered design changes to the preferred scheme consisting of three lane approaches and a three-lane gyratory with traffic signals. The final</p>

Action	Description	Applicant Response
		<p>Scheme design was tested and refined based on the Paramics operational traffic model in combination with detailed Linsig junction traffic modelling.</p> <p>The alternatives considered, the option selection process and the evolution of the Scheme, post adoption of the JCS, are presented in Chapter 3 of the ES (APP-062).</p> <p>A timeline of key gateways in the evolution of the Scheme and statutory, non-statutory and public consultation is as follows:</p> <ul style="list-style-type: none"> • PCF Stage 1 and Stage 2 <ul style="list-style-type: none"> ○ Options identification and assessment (reported in TAR): March 2019 to September 2020 ○ Non Statutory Consultation: October to November 2020 ○ Option selection (reported in Scheme Assessment and Overview Report): December 2020 to June 2021 ○ Preferred Route Announcement: June 2021 • PCF Stage 3 <ul style="list-style-type: none"> ○ Initial preliminary design and assessment: June 2021 to November 2021 ○ Statutory Consultation: December 2021 to February 2022 ○ Finalise preliminary design and assessment (includes targeted consultations on changes): March 2022 to December 2023 ○ DCO Application Accepted – Jan 2024 <p>The Applicant would find it helpful if National Highways could provide a list identifying specifically what information it believes it has not had sight of.</p> <p>Please also refer to the following previous Applicant's responses on this matter:</p> <ul style="list-style-type: none"> • Applicant Written Submission of Oral Case for Issue Specific Hearing 1 (ISH1) (REP1-046)

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		<p>– 1.4 Need & 1.5 Alternatives)</p> <ul style="list-style-type: none"> • Applicant Written Submission of Oral Case for Issue Specific Hearing 3 (ISH3) (REP4-037 – Alternatives, Page 24) • Applicant Response to Interested Parties Deadline 4 Submissions (REP5-028 – 046-76)
7	Consider if an access can be provided to the safeguarded land in the no scheme world – plan to be provided.	Not for Applicant.
8	Consider if a commitment could be made that would facilitate that highway boundary is contiguous with the safeguarded land.	<p>The Applicant has further considered whether a greater commitment could be made regarding the precise boundaries of the adopted highway. The Applicant considers that at the current stage of detailed design it is not able to provide anything more than an indicative plan showing where there is a current intention to draw the highway boundary, but that this will always be subject to detailed design. The Applicant considers that it will be highly unlikely that GCC will continue to hold land where it is not designated as highway. Any land not ultimately required for the Scheme will likely be deposited of following Crichel Down rules. GCC may continue to hold some isolated areas of land, not as highway, where there are larger areas more remote from the main carriageway which are needed to be retained for landscaping, drainage, or other reason.</p> <p>The Applicant considers that its position is reasonable and in line with other highway DCOs which do not stipulate highway boundaries.</p> <p>It is the Applicant's position that ultimately access to the highway could be a relevant consideration in calculating quantum for compensation. However, this matter is not a subject for current examination as it will be determined by the Upper Tribunal (Land Chamber) in event of an unresolved dispute.</p>
9	Agricultural Vehicle swept path analysis for Mr Hadley's land.	Please see Appendix B for Applicant's response to Action Point 9.

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10	Confirmation re. local flood authority position regarding flood mitigation requirements at Staverton Brook.	Not for Applicant.
11	Consider wording of Requirement 8(3), 8(4) and 8(5). (re. pollution safeguards and inc. validation inclusion)	The Applicant has agreed a revision to Requirement 8 with the Environment Agency. It has updated the dDCO accordingly to reflect the agreed position between the parties, this has been submitted at Deadline 7. The final Statement of Common Ground (SoCG) which will be submitted at Deadline 10 will reflect this agreement to the wording of Requirement 8.
12	Applicant to demonstrate how activities re requirements and pre-commencement necessary would be completed by October 2025.	<p>The Applicant continues to anticipate commencing the construction phase in October 2025 and is therefore confident that relevant requirements and pre-commencement activities will have been undertaken in time (as shown in the Gantt chart response to ISH4.9 (Action Point 13)).</p> <p>The Applicant's approach is to develop the Environmental Management Plan (2nd Iteration) (EMP) as well as the following licenses/permits as indicated below :</p> <ul style="list-style-type: none"> • Preparation of a European Protected Species Licence (EPSL) for bats • Preparation of an EPSL for dormice • Preparation of a licence to allow for the closure of seven badger setts • Flood risk activity permit • Water abstraction and discharge licenses (as required) • Fish removal and waste licences (as required) <p>The Applicant intends to commence work on these activities in November 2024 so that the relevant permissions and licences are in place by to enable an October 2025 start on site. It should be noted that where necessary relevant survey works have already commenced to ensure a timely completion ahead of any application submission.</p> <p>With regard to the discharge of DCO requirements the dDCO also allows for consultation in pursuant of compliance of the requirements prior to the Order coming into force. The relevant</p>

Action	Description	Applicant Response
		<p>paragraph is found at requirement 20, page 47 of the draft DCO (REP5-003). This allows consultation to run before the Order is granted, although the Applicant notes that the SoS may grant an Order on different terms than the one requested by the Applicant. The Applicant's programme allows for consultation both before and after granting of the Order.</p> <p>Article 2(1) of the dDCO also defines terms used in the Order. These definitions include "commence" which makes clear that a number of works that would constitute a 'material operation' under the Town and Country Planning Act 1990 do not mean that the authorised development has been 'commenced'. This enables the Applicant to undertake certain preparatory works prior to the submission of relevant details for approval under the requirements, which the Applicant considers proportionate. The works that are excluded from the definition of commencement are either de minimis or have minimal potential for adverse impacts. They may in some cases need to be carried out in order to comply with the pre-commencement requirements (for example, to inform assessments and proposals required to be submitted for approval). The Applicant should be permitted to carry out low impact preparatory works following the grant of the development consent order, while it is working to discharge the pre-commencement requirements, thereby helping to minimise the construction timetable.</p> <p>These pre-commencement activities include:</p> <ul style="list-style-type: none"> • archaeological investigations. • investigations for the purpose of assessing ground conditions. • remedial work in respect of any contamination or other adverse ground conditions. • ecological surveys and pre-construction ecological mitigation works. • erection of any temporary means of enclosure. • set up works associated with construction compounds such as soil-stripping, stockpiling, and the provision of access points to construction compounds. • provision or diversion of service apparatus.

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		<ul style="list-style-type: none"> temporary display of site notices or advertisements. <p>As is outlined in the Gantt chart, provided in response to Action Point 13 below, the Applicant proposes to discharge the relevant pre-commencement requirements and activities in two stages, with the first facilitating the commencement of advance works in October 2025. To enable the October start date the Applicant has already commenced the necessary survey work and will start work on the discharge of requirements in November 2024. The discharge of requirements for the remaining works would then be completed in January 2026. The Applicant has every intention to secure land and rights through the continued progression of voluntary acquisition agreements post examination. Several key properties have already been purchased by the Applicant as they are required with the mobilisation and early phase of the Scheme. The negotiations will continue to be structured to facilitate an October 2025 start. There will however almost certainly be land and/or rights which cannot be secured voluntarily. The Applicant is confident that there would be sufficient time between the Order being confirmed and October 2025 to draw down all land and rights required to deliver the Scheme.</p> <p>Whilst it was acknowledged during ISH4 that land can theoretically be secured through compulsion within three months, the Applicant has incorporated six months into the programme to vest land through General Vesting Declarations (GVD) and take possessions through Notices to Treat and Notices of Entry.</p> <p>The draw down of land under both the voluntary agreements and the Order will be planned to ensure the land required in October 2025 for the early activity will be available. This is programmed within 4 months following confirmation of the Order with the wider land required being programmed over a 6 month period.</p>
13	Gant chart / timeline showing that full construction programme can be met including any required surveys or licences etc.	Please see Appendix C for Applicant's response to Action Point 13.
14	Evidence regarding extension of contract period from Homes England – March 2028 (3 month extension) completion date. Any subsequent	GCC has informed Homes England that it will be making a request to extend the milestone date relating to completion of the works from December 2027 to March 2028. GCC is currently in the process of compiling the formal request with supporting documentation for consideration by Homes

Action	Description	Applicant Response
	<p>update or progress with MHCLG and or HMT for an extension beyond that time.</p>	<p>England. This request is expected to be within Homes England's delegated authority for decision making and we have been advised that once received it will be considered promptly. Subject to a positive decision, and to formalise the change to the Grant Determination Agreement, a Deed of Variation will need to be prepared and entered into, and this process would be concluded as swiftly as possible thereafter.</p> <p>It is the Applicant's view that there is currently insufficient evidence to substantiate a further extension request beyond March 2028 however GCC note that mechanisms do exist within the GDA for material amendments to be considered by Homes England, MHCLG and HMT accordingly should the need arise in the future. GCC would also note that they have previously successfully secured a material amendment through this mechanism.</p>
15	<p>Written submissions regarding likelihood of hope value claim and if so, is that covered in applicant's funding statement.</p>	<p>This submission is in relation to the safeguarded land at North West Cheltenham, which is currently owned by Ms Bruton, Ms Counsel and by Carter et al (the Carter land) and which is subject to an option agreement with Bloor Homes Ltd (Bloors). It considers whether the M5 J10 Scheme removes or reduces any hope value in the safeguarded land and, if so, how far that has been taken into account in calculating and allocating funds for compensation payments in respect of the Scheme.</p> <p>This is land currently safeguarded in the JCS for longer-term development needs. It is not allocated for development at the present time but it is envisaged that it may come forward as part of a future review of the JCS. The Scheme does not change the status of the land and its implementation would not remove any hope value in the safeguarded land. Indeed, the Scheme would provide necessary highway infrastructure to allow the safeguarded land to be brought forward for residential and employment development. The Scheme therefore increases the value of the safeguarded land (betterment). In the no-scheme world the land would, therefore, have less value and no compensation allocation is required.</p> <p>Furthermore, the M5 J10 Scheme does not impede or prevent access to the land. There is, therefore, no compensation allocation required for injurious affection to the retained safeguarded land as a result of severance. The Applicant has summarised its position regarding the access throughout hearings and submissions.</p>

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16	Update regarding positions regarding scheme cost and variances.	<p>The Applicant received National Highways' initial cost estimate on 8 October 2024 and met on 24 October 2024 to discuss and resolve areas of disagreement. At the meeting, the Applicant and National Highways resolved a number of queries, however, there remain two principal areas of disagreement:</p> <ul style="list-style-type: none"> • Construction preliminaries (indirect costs such as site compounds, insurance, traffic management) • Inflation. <p>Construction preliminaries</p> <p>The Applicant has developed a 'bottom up' estimate for indirect costs that considered the scheme specific circumstances including a significant proportion of bottom-up estimating (for example determining the size, layout and makeup for site compounds). As part of the check and review of the construction preliminaries, the Applicant calculated the total indirect costs (£45.8m) as a percentage of the total direct costs (£99.6m) to be 46%. The allowance is approximately twice what would be anticipated for a local highway network major project. The Applicant believes NH's database draws information from trunk road schemes featuring complex interchanges and online improvements such as smart motorways schemes which would disproportionately inflate the level of preliminary costs due to complex traffic management, limitations on working areas and elevated levels of governance and management costs.</p> <p>Inflation</p> <p>As stated in the Funding Statement Technical Note (REP4-043), the Applicant has used the BCIS General Civil Engineering Cost Index. BCIS are a recognised industry standard organisation that collates and provides a wide range of independent cost information to help organisations manage costs. Of the different indices published by BCIS, the applicant considered the General Civil Engineering Cost Index to be the one most representative to the Scheme.</p>

Action	Description	Applicant Response																																																					
		<p>The base date used for the estimate in the spend profile is Q2 2022 and inflation has been calculated using a spend profile from Q3 2022 until the end of construction. The Scheme's design has not changed since Q2 2022 in a way that would materially affect costs.</p> <p>The table below contains the BCIS May 2023 indices that were used at the time to calculate inflation, and the latest indices published by BCIS (note: historic indices may be revised by BCIS to take into account further information received). The October 2024 data is the most recent dataset and reflects not only the level of inflation that was experienced in the past but also includes updated forecasts for the future.</p> <table border="1" data-bbox="900 592 1957 1275"> <thead> <tr> <th data-bbox="900 592 1048 807">Time Period</th> <th data-bbox="1048 592 1182 807"></th> <th data-bbox="1182 592 1370 807">BCIS index (May 23)</th> <th data-bbox="1370 592 1554 807">Change in inflation with respect to baseline</th> <th data-bbox="1554 592 1778 807">BCIS index (Oct 24)</th> <th data-bbox="1778 592 1957 807">Change in inflation with respect to baseline</th> </tr> </thead> <tbody> <tr> <td data-bbox="900 807 1048 874">Baseline</td> <td data-bbox="1048 807 1182 874">Sep 22</td> <td data-bbox="1182 807 1370 874">205.6</td> <td data-bbox="1370 807 1554 874"></td> <td data-bbox="1554 807 1778 874">205.5</td> <td data-bbox="1778 807 1957 874"></td> </tr> <tr> <td data-bbox="900 874 1048 940">FY22/23</td> <td data-bbox="1048 874 1182 940">Mar 23</td> <td data-bbox="1182 874 1370 940">203.4</td> <td data-bbox="1370 874 1554 940">-1.1%</td> <td data-bbox="1554 874 1778 940">203.6</td> <td data-bbox="1778 874 1957 940">-0.9%</td> </tr> <tr> <td data-bbox="900 940 1048 1007">FY23/24</td> <td data-bbox="1048 940 1182 1007">Mar 24</td> <td data-bbox="1182 940 1370 1007">212.0</td> <td data-bbox="1370 940 1554 1007">3.1%</td> <td data-bbox="1554 940 1778 1007">209.9</td> <td data-bbox="1778 940 1957 1007">2.1%</td> </tr> <tr> <td data-bbox="900 1007 1048 1072">FY24/25</td> <td data-bbox="1048 1007 1182 1072">Mar 25</td> <td data-bbox="1182 1007 1370 1072">216.4</td> <td data-bbox="1370 1007 1554 1072">5.3%</td> <td data-bbox="1554 1007 1778 1072">211.6</td> <td data-bbox="1778 1007 1957 1072">3.0%</td> </tr> <tr> <td data-bbox="900 1072 1048 1139">FY25/26</td> <td data-bbox="1048 1072 1182 1139">Mar 26</td> <td data-bbox="1182 1072 1370 1139">220.1</td> <td data-bbox="1370 1072 1554 1139">7.1%</td> <td data-bbox="1554 1072 1778 1139">218.1</td> <td data-bbox="1778 1072 1957 1139">6.1%</td> </tr> <tr> <td data-bbox="900 1139 1048 1204">FY26/27</td> <td data-bbox="1048 1139 1182 1204">Mar 27</td> <td data-bbox="1182 1139 1370 1204">225.0</td> <td data-bbox="1370 1139 1554 1204">9.4%</td> <td data-bbox="1554 1139 1778 1204">224.4</td> <td data-bbox="1778 1139 1957 1204">9.2%</td> </tr> <tr> <td data-bbox="900 1204 1048 1275">FY27/28</td> <td data-bbox="1048 1204 1182 1275">Dec 27</td> <td data-bbox="1182 1204 1370 1275">229.2</td> <td data-bbox="1370 1204 1554 1275">11.5%</td> <td data-bbox="1554 1204 1778 1275">230.2</td> <td data-bbox="1778 1204 1957 1275">12.0%</td> </tr> </tbody> </table>						Time Period		BCIS index (May 23)	Change in inflation with respect to baseline	BCIS index (Oct 24)	Change in inflation with respect to baseline	Baseline	Sep 22	205.6		205.5		FY22/23	Mar 23	203.4	-1.1%	203.6	-0.9%	FY23/24	Mar 24	212.0	3.1%	209.9	2.1%	FY24/25	Mar 25	216.4	5.3%	211.6	3.0%	FY25/26	Mar 26	220.1	7.1%	218.1	6.1%	FY26/27	Mar 27	225.0	9.4%	224.4	9.2%	FY27/28	Dec 27	229.2	11.5%	230.2	12.0%
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Action	Description	Applicant Response
		<p>The table shows:</p> <ul style="list-style-type: none"> no significant changes to the forecast inflation profile between May 2023 and October 2024 Inflation last financial year was lower (209.9) than forecast (212.0) that depending on when the baseline cost is incurred, they need to be increased between 5.3% (start of construction) and 11.5% (end of construction) to allow for inflation It appears that an allowance of 11.5% for working in FY27/28 is compatible with the latest forecast for that financial year. <p>Comparatively, National Highways suggested at the last meeting that baseline construction costs need to be increased by between 31.5% (start of construction) and 41.7% (end of construction) for inflation. The Applicant understands National Highways inflation calculations utilise IOPI index published to Q1 2024 and forecast beyond Q2 2024 based on CPI+200basis points, but has not been able to verify these figures or National Highways calculations. The Applicant's view is that National Highways' inflation rates do not bear resemblance to published rates of inflation.</p> <p>Therefore, the Applicant considers that it's assessment and estimation of construction preliminaries and inflation is the more robust and that National Highways' has not sufficiently justified their position to indicate otherwise.</p>
17	Position statement and any agreement from the UK Infrastructure Bank that the cost discrepancy (over and-above HE monies) can be funded.	Please see the Applicant's updated funding statement (REP6-005), submitted at Deadline 6, which outlines the current position with UKIB.
18	Position statement regarding ability of S106 monies to be sought for a highway scheme that has already commenced.	Provided that the tests in Regulation 122 of the Community Infrastructure Levy Regulations 2010 are met, a section 106 planning obligation can be required in connection with a grant of planning permission. Those tests are (a) it is necessary to make the development acceptable in planning terms; (b) it is directly related to the development; and (c) it is fairly and reasonably related in scale and kind to the development.

Action	Description	Applicant Response
		<p>GCC's position is that the proposed M5 J10 works are necessary to enable the Strategic Allocations A4 and A7 to be acceptable in planning terms as well as the safeguarded land and other developments in the locality for which the Scheme provides the necessary mitigation to allow them to be consented. Such developments should, pursuant to the JCS and policy INF7, contribute towards the Scheme and discussions have taken place with developers of the Strategic Allocations on this basis. The Applicant considers that such contributions would be directly related to the developments, and they would be set at a level which are fairly and reasonably related in scale and kind.</p> <p>Contributions are capable of meeting the Regulation 122 tests where they are subject to a section 106 obligation which is entered into prior to commencement of the Scheme or, where the Scheme has been implemented but has yet to be completed. If there are elements of the Scheme which remain to be constructed when a section 106 contribution is sought towards the Scheme and/or elements of the Scheme are not yet open to the public, the Applicant is not aware of any restriction which would prevent contributions being secured. Provided the Scheme is needed to make the requisite development acceptable in planning terms, a contribution will be directly related to the development and, provided the contribution being sought is fair and reasonable in terms of scale, the Regulation 122 tests will be met.</p> <p>The Applicant considers that there would be difficulty meeting the tests where the Scheme has been completed as the test of necessity will have already been satisfied through delivery of the Scheme. It should be noted that does not prevent section 106 obligations being agreed with developers for contributions to be made towards the Scheme, but they would effectively be voluntary as they would not meet the CIL tests and therefore could not be required as part of a grant of planning permission. However, they would be lawful as having more than a trivial connection to the Scheme as per the test in <i>Tesco Ltd v Secretary of State for the Environment</i> [1995] 1 WLR 579. In order to require contributions to be made post Scheme completion, the Applicant would be reliant on new Development Plan policy or Supplemental Planning Documents put in place prior to Scheme completion.</p> <p>So far as SPD is concerned, its preparation and adoption is governed primarily by the Planning and Compulsory Purchase Act 2004 ("PCPA 2004") and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) ("the 2012 Regulations"). The 2012</p>

Action	Description	Applicant Response
		<p>Regulations require that an SPD must be in conformity with national policies. The National Planning Practice Guidance states that the role of an SPD is to build on and provide more detailed advice or guidance on policies in an adopted Local Plan. An SPD must contain a reasoned justification of the policies contained within it, must not conflict with the adopted development plan and must have regard to national policies and advice contained in guidance issued by the Secretary of State. The local planning authorities have the power under Part 2 of the PCPA 2004 to make local development documents, such as an SPD. Once adopted, an SPD will be a material consideration in decision making to which regard will have to be had when considering any planning application.</p> <p>In this case, any SPD would need to be prepared in accordance with the Joint Core Strategy 2011-2031 (adopted December 2017) and its policies, in particular, Policy INF7. It would also need to be prepared in accordance with the National Planning Policy Framework/ Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as above). It is considered by the Applicant that an SPD can provide for a mechanism to be put in place to require such contributions to be paid pursuant to a section 106 obligation in relation to Scheme dependent developments after the M5, J10 Scheme has been completed, in so far as such contributions have not already been agreed and formalised. This approach would meet the NPPF/CIL tests outlined above and they are in line with Policy INF7.</p> <p>It should be noted that whilst the absence of an SPD does not change the Applicant's approach to scheme funding, as per its Funding Statement (REP6-005), it is considered that an SPD would strengthen GCC's ability to secure contributions towards the Scheme following its completion from relevant development sites and, therefore, it will be considered further with the relevant local planning authorities.</p>
19	Updated Funding Statement including CIL position, above items (as appropriate) and Change Requests 1 and 2.	The Applicant has provided an updated Funding Statement (REP6-005) at Deadline 6.
20	JCs to submit CIL Funding Policy agreed once relevant Joint Committee meeting has taken place 12 November 2024	Not for Applicant.

Action	Description	Applicant Response
21	Provide updated CIL funding figure secured.	Not for Applicant.
22	Applicant to confirm position of status within the Examination of the signatures of 'Letter of In Principle Support' [REP5-031].	<p>The signatories to the letter of in principle support are:</p> <ul style="list-style-type: none"> • NEMA Strategic Land; • Bloor Homes; • Persimmon; • HBD; • Gloucestershire County Council – Asset Management and Property Services (AMPS); and • Savills on behalf of St Modwen and Midlands Land Portfolio Limited (MLPL). <p>Set out below is a brief description of each developer along with a summary of their status within the Examination.</p> <ul style="list-style-type: none"> • NEMA Strategic Land Ltd is a key development partner for the West of Cheltenham allocated site (also known as the Golden Valley Development). NEMA Strategic Land Ltd is in active pre-application discussions with Cheltenham Borough Council in relation to the potential of bringing forward a mixed-use development. NEMA Strategic Land Ltd is not noted in the Book of Reference and is therefore not an affected person. Separately, it has not submitted a relevant representation and therefore the Applicant suggests that it is neither classed as an interested party. • Bloor Homes Limited and Persimmon Homes Limited are house-building developers. The developers are in a joint venture in relation to the Elms Park development at the North West Cheltenham allocated site. The developers are interested parties and made a joint relevant representation on 22 March 2024 [RR-006]. Bloor Homes also hold land purchase options relating to the development of the safeguarded site adjacent to Junction 10, which is identified in the adopted Joint Core Strategy. Bloor Homes submitted a relevant representation in this respect on 22 March 2024 [RR-005].

Action	Description	Applicant Response
		<ul style="list-style-type: none"> • Gloucestershire County Council – AMPS are GCC’s Asset Management and Property Services department. AMPS combines a full estates and buildings function for the Council and in the context of this dDCO Examination represent GCC as landowner. • HBD is a key development partner of Cheltenham Borough Council for the West of Cheltenham (Golden Valley) Development. HBD submitted a written response to ExQ2 at Deadline 5 [REP5-034]. HBD is not noted in the Book of Reference and is therefore not an affected person. Separately, it has not submitted a relevant representation and therefore the Applicant suggests that it is neither classed as an interested party. • MLPL is a property development arm of Severn Trent Water and Northern Trust. MLPL appointed St Modwen as development partner for the West of Cheltenham (Golden Valley) Development in January 2021. MLPL and St Modwen are interested parties, and a joint relevant representation was submitted on their behalf by Savills on 22 March 2024 [REP-034]. A written response to ExQ2 was submitted by MLPL and St Modwen at Deadline 5 [REP5-040]. <p>The Applicant would note that some of the above parties are neither affected persons nor interested parties. However, the Applicant would suggest that this does not have an effect on the salience of the letter nor the Examining Authority’s ability to take its content into account. It remains in the Examining Authority’s discretion to accept any written representations, responses to questions or further information into examination.</p>
23	Provide plan(s) showing location of planning applications submitted by signatures of ‘Letter of In Principle Support’ [REP5-031].	Not for Applicant.
24	Updated information regarding agricultural access into Brunton / Counsell Land (inc. consideration of access into land via straight continuation of proposed signal spur.).	Please see Appendix D for plans of Agricultural access into the Bruton and Counsell land.

Action	Description	Applicant Response
25	JC LHA consideration of ability of DCO agricultural access proposal into Brunton / Counsell (and adjacent land plots) to provide safe and suitable access (including possible congestion effects on A4019).	Not for Applicant.
26	Updated position regarding Article 7.	The Applicant has agreed with the Joint Council's to remove Article 7(2) and 7(3) from its dDCO. The Applicant has updated the dDCO, submitted at Deadline 7, to reflect this amendment. The Applicant's Explanatory Memorandum will be updated to reflect this change by Deadline 10.
27	Applicant to consider St Modwen issues and provide an update regarding Article 7 (as per REP1-064).	<p>The Applicant is not aware that this consideration remains an extant issue for this Interested Party. The Applicant met with the Interested Party 2nd July 2024 where it was discussed that St Modwen would review and revise their SANG requirements. The Applicant is seeking clarification direct and will update the SoCG accordingly.</p> <p>The Applicant understands that St Modwen's position raised in REP1-064 is essentially that the Scheme would overlap with its proposed development resulting in a "loss" of 0.67ha of SANG land. It should be noted that the "loss" is not a real loss of actual SANG land but a "loss" of an area which St Modwen are proposing for SANG as part of their planning application. St Modwen raise at paragraph 1.16 of REP1-064 that "the Biodiversity Chapter (7) for the DCO application explicitly notes (para 7.6.12) the following: "one of the objectives of the scheme is to unlock the proposed housing developments in the area by providing the necessary highways infrastructure". In this light, this would appear to conflict directly with the scheme, as reducing the area of SANG as a result of the works would be likely, in fact, to do the opposite for the West Cheltenham site".</p> <p>The Applicant does not agree that due to a discrete overlap the Scheme could be said not to be "unlocking" housing. The Scheme "unlocks" housing due to the additional capacity it provides on the local and strategic road network.</p> <p>The Applicant considers that the Scheme will be a material planning consideration in any future grant of the development site, and therefore the Applicant would expect that the local planning authority would ensure that there is no overlap in the planning permissions upon its grant.</p>

Action	Description	Applicant Response
		<p>The Applicant appreciates that due to the Scheme's proposed design that St Modwen may have to make amendments to the design of its as of yet unconsented planning permission. The Applicant considers that whilst every effort has been made to limit the number of instances where developers might need to make such amendments to their proposed schemes and so ensure that the Applicant's Scheme and developers proposed schemes align seamlessly, in some instances such overlap has been unavoidable and reflects the complex and shifting nature of the locality being subject to such a number of planning permissions.</p> <p>The need for the Scheme has been demonstrated separately.</p>
28	Set out current position / differences re. DCO Articles 11, 15, 18, 20 and deemed consent concerning SRN.	Discussions regarding the deemed consent provisions are progressing positively between the Applicant and NH and we expect the issue to be resolved by Deadline 9. A further update will be provided by the Applicant at that deadline.
29	Updated positions regarding need for bond and funding (inc. ability of HIF monies to include a Step-In right for NH)	Discussions regarding the deemed consent provisions are progressing positively between the Applicant and NH and we expect the issue to be resolved by Deadline 9. A further update will be provided by the Applicant at that deadline.
30	Update regarding funding and progress regarding implementation / development of the noise mitigation traffic calming scheme on Stoke Road.	<p>The Stoke Orchard Scheme traffic calming is being funded separately by GCC from GCC capital funding associated with a wider HIF programme of works.</p> <p>Stoke Orchard traffic calming is currently in its detail design phase, which is planned to be completed by December 2024. GCC then intend to use their Highways Framework Contractor to construct the scheme starting March / April 2025.</p> <p>GCC has been in regular liaison with the Stoke Orchard Parish Council since the "options identification" phase to develop a scheme that is supported by the Parish Council and local community. The Preliminary design (completed in Jun 2024) was fully supported by the Parish Council and therefore allowed GCC to progress into detail design phase. Recently, the project team held an information event on 7 September 2024, to provide the local community with an update of the scheme.</p>

Action	Description	Applicant Response
31	Provide NEMA appended plan and clarification of date / typos. Doc Ref: REP5-027-page 14.	Please see Appendix E for copy of the GCC correspondence requested.
32	Update re. Mr Badham's property, acceptability of noise barriers and mitigation. Is the property considered as a non-designated heritage asset. What are the implications of this?	<p>Noise barrier location and extent</p> <p>The noise barrier outside of Mr Badham's property is shown on the Environmental Masterplan (Sheet 13 of 16) (REP4-010). It is shown on the plan as a purple line located in the verge between the service road and the cycleway/footway.</p> <p>The assessment of noise reported in ES Chapter 6 (Noise and Vibration) (AS-014) predicts a decrease in noise at Mr Badham's property. This is a result of the realignment of the A4019 further away from the property than it is currently. The realignment of the A4019 to the south means that the eastbound carriageway is further away from the property. In addition, the widening of the A4019 results in the westbound carriageway being even further away. As a result, a minor to moderate decrease in noise at this property is predicted, even without the noise barrier, in the opening year. With the noise barrier in place, as provided with the Scheme, there is a moderate to major decrease in noise in the short term and a minor to moderate decrease in the long term at Mr Badham's property and sections of the garden.</p> <p>With regard to the design of the noise barrier, the presence of vegetative solutions will not affect the assumed benefit as provided in ES Chapter 6. Noise barriers are designed so that the sound through a barrier is negligible compared with the sound going over the top of it.</p> <p>With regards to the length of the noise barrier and the mitigation provided, a 20m extension eastwards of the noise barrier at this location has been investigated. This was raised by Mr Badham, as there was a concern regarding the current extent not covering the entire of the wider garden of Elton Lawn. The Applicant would note that the noise barriers proposed in Uckington, have been designed to mitigate noise impacts to NIA3949, in addition to the re-alignment of the A4019 to the south (through Uckington). NIA3949 covers the section of the A4019 from 1 Tewkesbury Road to the west through to the property Cherry Orchard in the east. The properties of Post Box Cottage, Landean and Elton Lawn fall outside of the NIA, and have benefited as a result of the noise barrier and the re-alignment of the A4019. The Applicant does not consider it necessary</p>

Action	Description	Applicant Response
		<p>to provide enhancement to Elton Lawn by extending a noise barrier which is currently predicted to achieve its purpose in mitigating impacts to the NIA.</p> <p>Non-designated heritage asset</p> <p>Regarding the designation of the property as a non-designated heritage asset, the Applicant can confirm that neither Mr Badhams property or adjacent properties are listed on the Historic Environment Record (HER), or on local heritage listings held by Cheltenham Borough Council or Tewkesbury Borough Council. The baseline assessments undertaken by the Applicant did not identify any heritage records for buildings in this location that would have resulted in these buildings being included in the ES.</p> <p>Under the methodology applied for the heritage assessment in the ES, it is not the role of the Applicant to assess heritage significance of buildings that are not included in the HER or local heritage listings or otherwise suggested as historically significant based on map regression analysis or other research done for the desk-based studies. It is the responsibility of the Local Planning Authority to identify and assess the historic significance of buildings within their jurisdiction.</p> <p>Subsequent to the ISH4 hearing, the Joint Councils confirmed that the Conservation Officer for Tewkesbury Borough Council (TBC) has stated that Elton Lawns (along with Landean and Post Box Cottage) are categorised by TBC as non-designated heritage assets on the basis that they meet some of the criteria listed on TBC's supplementary planning document adopted in February 2022 entitled 'Local Heritage List Selection Criteria for Tewkesbury Borough'. The Conservation Officer also confirmed that none of these properties are listed as non-designated heritage assets on the Historic Environment Record or local heritage listings.</p> <p>Subsequent to further information being provided to the Applicant by TBC, the Applicant will review the assessment presented in ES Chapter 11 (Cultural Heritage) [APP-070], and provide an updated assessment, as appropriate, at Deadline 9 subject to the timely receipt of the necessary information.</p>

Action	Description	Applicant Response
		<p>Visual impact</p> <p>The presence of the noise barriers is included in the assessment of visual impact of the Scheme on local properties.</p>
33	No Action number 33	
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?	<p>REAC item LV6 [REP4-018] sets out that 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. As detailed in paragraph 9.15.9 of ES Chapter 9 (LVIA) the design (as determined at detailed design stage) may include simple timber boards, living woven planting, green wall systems or a painted design to provide as much additional amenity value as possible, and that consultation would be undertaken with directly affected receptors and maintenance teams to identify the most appropriate design for each noise barrier.</p> <p>ISH4.26 (Action Point 34) relates to the ability for vegetation to be included on both sides of the acoustic barriers (noise barriers) within the space available, and therefore on the opportunities for vegetation to be included in design options consulted on in REAC item LV6. The Applicant notes that consultation will cover more options than just vegetation.</p> <p>Regarding space for vegetation, the Applicant confirms that space is available along the majority of both sides of each of the noise barriers in the preliminary design. There are exceptions where space constraints would preclude the inclusion of vegetation along a part of a particular noise barrier. These are set out below. The locations where the Applicant considers that there are space constraints in the preliminary design that would preclude vegetation planting are set out below:</p> <ul style="list-style-type: none"> • There are constraints along the very eastern end of the noise barrier in Uckington (east of the Green)(ref. M2b in Table 6-13 of ES Chapter 6 (Noise and Vibration) [AS-014]), on the side facing the A4019. Space is available to plant vegetation along the entire length of the noise barrier facing the houses. The constraints described apply to <20m of this 150m long barrier.

Action	Description	Applicant Response
		<ul style="list-style-type: none"> • There are constraints for the entire length (95m) of the noise barrier in Uckington (west of the Green)(ref M2a) on the side facing the A4019. Space is available to plant vegetation along the entire length of the noise barrier facing the houses. • For the 350m long noise barrier between the West Cheltenham Fire Station and the Civil Service Sports Ground (ref M3) there is space for planting along the side of the barrier facing the A4019, except for a section of <20m where there is no space for planting on either side. • For the barriers (ref M1 (a 160m long barrier separating Cooks Lane and the adjacent layby from the A4019) and M4 (a 95m long barrier between Barn Farm and the northbound M5 carriageway)) there is no space available for planting on the side of the barrier facing the houses. There is space for planting on the side facing the A4019 and the motorway (respectively) for both barriers. <p>The Applicant considers that the principal way these space constraints could be overcome is through the micrositing of the noise barriers at the detailed design stage. By micrositing the Applicant means minor changes to the horizontal situation of the noise barriers within a proposed highway verge to provide additional space for planting. For example for the noise barrier ref. M3 the micrositing of the barrier further away from the service road would allow space for planting along the entire length of the barrier facing the housing (apart from the <20m section highlighted above). Such micrositing changes would not change the conclusions of the noise assessment reported in ES Chapter 6 (Noise and Vibration) [AS-014].</p>
35	Provide omitted plan from REP5-033.	Not for Applicant.

Appendices



Appendix A. Response to Action Point 2: Active Travel Policy Position

Action Point 2: Active Travel Provision and the relationship to local plan policy and NPSNN paragraph 5.211

In order to set the context for the consideration of local plan policy it should be noted that paragraph 5.211 of the National Policy Statement for National Networks (NPSNN) (2014) states that:

“5.211 The Examining Authority and the Secretary of State should give due consideration to impacts on local transport networks and policies set out in local plans, for example, policies on demand management being undertaken at the local level.”

The local policy framework against which the Scheme’s active travel provision should be considered is outlined as follows:

- Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011 – 2031 (December 2017)
- Gloucestershire Local Transport Plan (Revised March 2021)
- Joint Core Strategy Infrastructure Delivery Plan (August 2014)
- Central Severn Vale Local Cycling and Walking Infrastructure Plan (December 2019)
- The Cheltenham Plan (July 2020)
- Tewkesbury Borough Plan 2011 to 2031 (June 2022)
- Golden Valley Development Supplementary Planning Document (July 2020)

Gloucester, Cheltenham and Tewkesbury Joint Core Strategy 2011 - 2031

Policy SD4(v): Design Requirements

“New development should be designed to contribute to safe communities including reducing the risk of fire, conflicts between traffic and cyclists or pedestrians, and the likelihood and fear of crime.”

The Scheme design includes an active travel corridor along the length of the Link Road and the A4019 (within the extents of the Scheme). This will provide traffic free space for cyclists and pedestrians with the objective of reducing car journeys through the Scheme and thereby reducing noise and air quality impacts, as well as conflicts between traffic and cyclists or pedestrians.

Policy SD4(vii): Design Requirements

“New development should be designed to integrate, where appropriate, with existing development, and prioritise movement by sustainable transport modes, both through the application of legible connections to the wider movement network, and assessment of the hierarchy of transport modes set out in Table SD4a below. It should:

- *Be well integrated with the movement network within and beyond the development itself*
- *Provide safe and legible connections to the existing walking, cycling and public transport networks;*
- *Ensure accessibility to local services for pedestrians and cyclists and those using public transport*
- *Ensure links to green infrastructure;*
- *Incorporate, where feasible, facilities for charging plug-in and other ultra-low emission vehicles;*

- *Be fully consistent with guidance, including that relating to parking provision, set out in the Manual for Gloucestershire Streets and other relevant guidance documents in force at the time.”*

The scheme will include a segregated cycleway (3m width) and footway (2m width) on the northern side of the A4019 which, with the exception of a short section of shared use path through Uckington, will extend from the junction of the A4019 with Stanboro Lane in the west through to the Gallagher junction at the eastern end of the Scheme. This active travel corridor will provide connectivity for pedestrians and cyclists between north-west Cheltenham and the junction of the A4019 and Stanboro Lane (west of M5 Junction 10). It will tie into an existing shared use path at the eastern end of the Scheme, and an existing footway at the western end. This will provide safe and legible connections into the existing walking cycling and public transport networks, providing improved links throughout the Scheme’s extents.

Bus gates have also been included in the preliminary design at the Site Access A and Site Access B junctions eastbound from the A4019. In addition, a bus lane and a bus gate have been included on the A4019 eastbound, between Site Access A and the Gallagher junction, and eastbound into the Gallagher junction, respectively. Taxis and cycles will also be able to use the bus lane. This will ensure accessibility to local services for pedestrians and cyclists and those using public transport.

Policy INF1: Transport Network

- “1. *Developers should provide safe and accessible connections to the transport network to enable travel choice for residents and commuters. All proposals should ensure that:*
 - Safe and efficient access to the highway network is provided for all transport modes;*
 - Connections are provided, where appropriate, to existing walking, cycling and passenger transport networks and should be designed to encourage maximum potential use;*
 - All opportunities are identified and taken, where appropriate, to extend and / or modify existing walking, cycling and public transport networks and links, to ensure that credible travel choices are provided by sustainable modes.*
2. *Planning permission will be granted only where the impact of development is not considered to be severe. Where severe impacts that are attributable to the development are considered likely, including as a consequence of cumulative impacts, they must be mitigated to the satisfaction of the Local Planning Authority in consultation with the Highway Authorities and in line with the Local Transport Plan*
3. *Developers will be required to assess the impact of proposals on the transport network through a Transport Assessment. The assessment will demonstrate the impact, including cumulative impacts, of the prospective development on:*
 - Congestion on the transport network;*
 - Travel safety within the zone of influence of the development;*
 - Noise and / or atmospheric pollution within the zone of influence of the development;*
4. *Where appropriate the Local Planning Authority may require applications to be accompanied by a Travel Plan that has full regard to the criteria set out in the NPPF.”*

As outlined above, opportunities for connections to existing walking, cycling and passenger transport networks have been provided throughout the Scheme extents, where appropriate, and within the context of the wider Scheme objectives. Outside of the Scheme extents it should be noted that in facilitating the Strategic Allocations A4 and A7 the Scheme also facilitates the active travel provision that will be brought forward by those sites, and which is evidenced in the live planning applications for the proposed residential development as well as the Golden Valley SPD.

INF3: Green Infrastructure

- “1. The green infrastructure network of local and strategic importance will be conserved and enhanced, in order to deliver a series of multifunctional, linked green corridors across the JCS area by:
 - i. Improving the quantity and / or quality of assets;*
 - ii. Improving linkages between assets in a manner appropriate to the scale of development, and*
 - iii. Designing improvements in a way that supports the cohesive management of green infrastructure;**
- 2. Development proposals should consider and contribute positively towards green infrastructure, including the wider landscape context and strategic corridors between major assets and populations. Where new residential development will create, or add to, a need for publicly accessible green space or outdoor space for sports and recreation, this will be fully met in accordance with Policy INF4. Development at Strategic Allocations will be required to deliver connectivity through the site, linking urban areas with the wider rural hinterland*
- 3. Existing green infrastructure will be protected in a manner that reflects its contribution to ecosystem services (including biodiversity, landscape / townscape quality, the historic environment, public access, recreation and play) and the connectivity of the green infrastructure network. Development proposals that will have an impact on woodlands, hedges and trees will need to include a justification for why this impact cannot be avoided and should incorporate measures acceptable to the Local Planning Authority to mitigate the loss. Mitigation should be provided on-site or, where this is not possible, in the immediate environs of the site*
- 4. Where assets are created, retained or replaced within a scheme, they should be properly integrated into the design and contribute to local character and distinctiveness. Proposals should also make provisions for future maintenance of green infrastructure.”*

In providing an active travel corridor along the length of the Link Road and the A4019 (within the extents of the Scheme) the Scheme also facilitates the Strategic Allocations A4 and A7 to deliver connectivity through their sites, whilst linking with both urban and rural areas.

INF4: Social and Community Infrastructure:

- “1. Proposals to develop land or buildings currently or previously in use as a community facility will demonstrate, including evidence of engagement with relevant local community groups and partner organisations, why the facility is no longer required and, as appropriate, how, when and where suitable local replacement facilities will be*

provided. Provision of replacement facilities will have regard to the locational and other relevant elements of this policy

- 2. Where new residential development will create, or add to, a need for community facilities, it will be fully met as on-site provision and / or as a contribution to facilities or services off-site. New or refurbished provision will be of an appropriate type, standard and size. From an early stage, developers will be expected to engage with the relevant local authorities and infrastructure providers and, as appropriate, relevant local community groups where they exist, to ensure that new provision meets the needs of the community that it will serve and is fit for purpose*
- 3. Social and community infrastructure should be centrally located to the population it serves and be easily accessible on foot and by bicycle. It should be located so as to have the potential to be well-served by public transport. Developers should aim to provide flexible, multifunctional facilities within mixed-use developments, creating shared space which maximises benefits to the community and minimises land-take. In the case of open space, 'easily accessible' means it is located within reasonable walking distance of the development it serves. New facilities should be accessible to all members of the community, and be planned and phased in parallel with new development."*

In providing an active travel corridor along the length of the Link Road and the A4019 (within the extents of the Scheme), along with the provision of a bus lane and bus gates along the A4019 and to serve Strategic Allocation A4, the Scheme also enables the social and community infrastructure proposed through the Strategic Allocations A4 and A7 to be easily accessible on foot and by bicycle and well-served by public transport.

Policy SA1: Strategic Allocations Policy

- "1. New development will be provided within Strategic Allocations in order to deliver the scale and distribution of development set out in Policies SP1 and SP2*
- 2. The Strategic Allocations are listed in Table SA1 and delineated on Plans A1-A7 below and are marked on the policies map. The red lines on Plans A1–A7 mark the boundaries of the allocations and are separately and collectively part of this policy*
- 3. Each Strategic Allocation is supported by site specific policies A1-A7 below to provide further detailed guidance on the development of these sites. These site policies also form part of this policy*
- 4. Development proposals should enable a comprehensive scheme to be delivered across the developable area within each Strategic Allocation. Developers must ensure that the sites provide an appropriate scale and mix of uses, in suitable locations, to create sustainable developments that support and complement the role of existing settlements and communities*
- 5. Proposals must be accompanied by a comprehensive masterplan for the entire Strategic Allocation. This should demonstrate how new development will integrate with and complement its surroundings in an appropriate manner, in accordance with Policy SD4. The JCS authorities will be flexible in considering different approaches to achieving a comprehensive masterplan providing that proposals still take fully into account the*

development and infrastructure needs of the wider allocation and demonstrate that it would not prejudice the sustainable delivery of the entire allocation

6. *Strategic Allocations should seek in all cases to retain and enhance areas of local green space within the boundary of the allocation, which meet the criteria in the NPPF and relevant national guidance whilst delivering the scale and distribution of development required by this policy. This is in addition to the requirements of Policy INF3*
7. *Infrastructure should be planned and provided comprehensively across the site taking into account the needs of the whole Strategic Allocation. Developers must engage with the relevant infrastructure regulators and providers to ensure the implementation of the Infrastructure Delivery Plan and the provision of any other necessary infrastructure in accordance with Policies INF6 and INF7*
8. *The transport strategy to support the delivery of Strategic Allocations should align with and where appropriate contribute to the wider transport strategy contained within the Local Transport Plan, including priority transport corridors and junctions. The development of Strategic Allocations must encourage the use of walking, cycling and the use of public transport and ensure that transport demands arising from the development can be effectively mitigated in accordance with Policy INF1.”*

Through the provision of an active travel corridor along the length of the Link Road and the A4019 (within the extents of the Scheme), along with the provision of a bus lane and bus gates along the A4019 and to serve Strategic Allocation A4, the Scheme contributes towards the Strategic Allocations A4 and A7 ability to encourage the use of walking, cycling and the use of public transport, ensuring that transport demands arising from the developments can be effectively mitigated.

A4 – North West Cheltenham

“The Strategic Allocation identified at North West Cheltenham (as shown on Policies map Plan A4) will be expected to deliver:

- (xiv) *Safe, easy and convenient pedestrian and cycle links within the site and to key centres, providing segregated links where practical;”*

As detailed above the scheme will include a segregated cycleway (3m width) and footway (2m width) on the northern side of the A4019 which, with the exception of a short section of shared use path through Uckington, will extend from the junction of the A4019 with Stanboro Lane in the west through to the Gallagher junction at the eastern end of the Scheme. This active travel corridor will provide connectivity for pedestrians and cyclists between north-west Cheltenham and the junction of the A4019 and Stanboro Lane (west of M5 Junction 10). It will tie into an existing shared use path at the eastern end of the Scheme, and an existing footway at the western end. This will provide safe and legible connections into the existing walking cycling and public transport networks, providing improved links throughout the Scheme’s extents.

A7 – West Cheltenham

“The Strategic Allocation identified at West Cheltenham (as shown on Policies map Plan A7) will be expected to deliver:

- viii. *Safe, easy and convenient pedestrian and cycle links within the site, to key centres and with neighbouring existing development and the wider green infrastructure network;”*

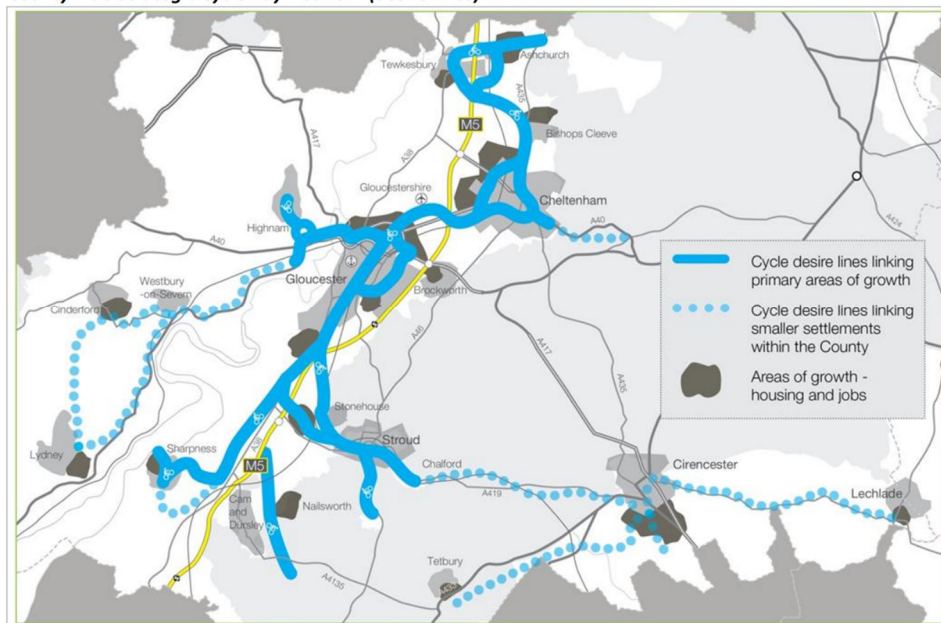
In providing an active travel corridor along the length of the Link Road and the A4019 (within the extents of the Scheme), along with the provision of a bus lane along the A4019, the Scheme facilitates access for Strategic Allocation A7 to provide pedestrian and cycle links to key centres and the wider green infrastructure network.

Gloucestershire Local Transport Plan

Gloucestershire's Cycle Network

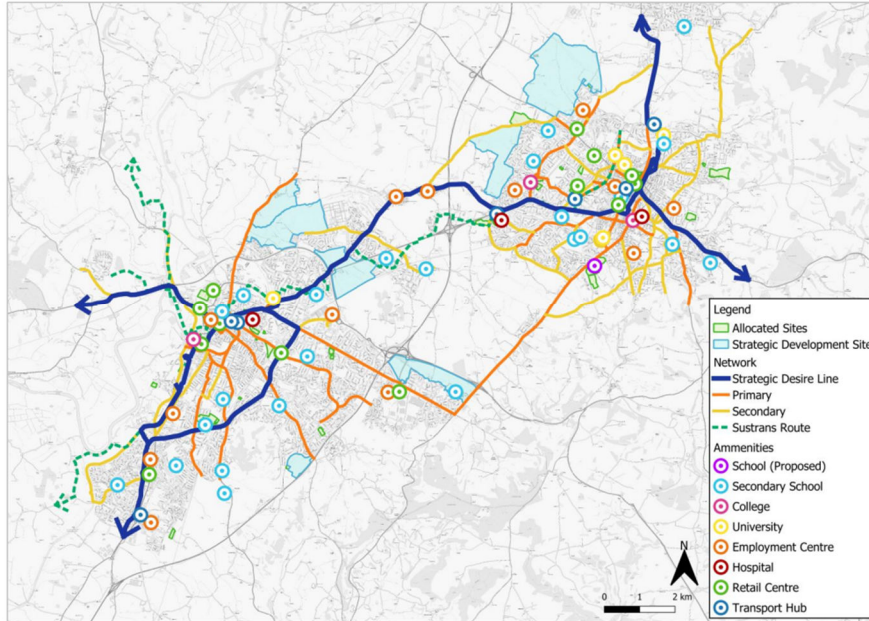
“3.3.6 Figure PD2 (C) shows the proposed strategic cycle desire lines across the county. The aim is to link the main urban settlements and areas growth through a combination of quiet ways and dedicated cycle facilities. Investment in cycle facilities will be targeted at these desire lines, as opportunities arise.”

Figure PD2 (C) – Countywide Strategic Cycleway Network (desire lines)



“3.3.7 In addition to connecting the strategic county cycleway desire lines, the LCWIP illustrated in Figure PD2 (D), has developed cycle network maps for Cheltenham and Gloucester that set out the strategic desire lines as well as the primary and secondary cycle network (see Figure PD2 (D)). This is the starting point of a rolling programme of cycle route assessments for the county.”

Figure PD2 (D) – LCWIP Cycle Network Map for Cheltenham & Gloucester



“Policy LTP PD 2.1 – Gloucestershire’s Cycle Network

GCC will deliver a high quality coherent, direct, safe, comfortable and attractive cycle network by improving cycle routes and reinforcing quiet highway connectivity.

GCC will do this by implementing the following policy proposals:

- Promote Gloucestershire’s cycle network through Thinktravel.
- Work with delivery partners, other agencies, and community stakeholders to identify and address barriers (physical and psychological) to cycling and make cycling a more inclusive activity for all.
- Improve cycle links between and within settlements throughout Gloucestershire.
- Focus investment in cycling in more developed areas and especially where new development is planned where the propensity is greatest.
- Recognise the role and function of the existing quiet lane network and seek to expand this where possible to provide safe cycle linkages.
- Ensure developers assess the needs of all pedestrians and cyclists within their development design and any improvements associated with the development, schools and supported with cycle parking/storage.
- Ensure all cycle infrastructure will meet approved design standards; for example Manual for Streets (MfS), LCWIP and DfT cycle design guidance LTN1/20 and best practice, as well as addressing the needs of those with mobility impairments.
- Ensure cycle routes are safe and form a continuous accessible network accessing town centres, residential areas, employment areas, and routes to schools.
- Ensure all schemes on the local highway network will be subject to appropriate context reports and audits (including the Countywide Cycleway, LCWIPs, green infrastructure pledge, road safety, non-motorised users, walking, cycling and quality audits, Building with Nature standards) before design approval.
- Support the development and promotion of the leisure cycle network, Public Rights of Way network and Other Routes with Public Access in order to encourage greater use,

linking both communities and leisure attractions, including findings from the latest National Cycle Network Review.

- *Work in partnership with communities in identifying local transport needs and solutions (such as through Parish and Neighbourhood Plans, Travel Plans, JCS, health & wellbeing strategies and plans).*
- *Work with District Councils to ensure that new development is well connected to the existing transport network and walk, cycle and mobility friendly.*
- *Ensure development sites connect to the strategic and LCWIP desire lines.*
- *Developers are required to make an assessment needs of all pedestrian/mobility user/cyclist in line government Road User Hierarchy within and associated with their development, to substantially improve the County's cycle network and meet improved design standards and audits; for example MfGS, LCWIP and other Context Reports and emerging DfT cycle design guidance and best practice, as well as addressing the needs of those with mobility impairments.*
- *Under the Highways Act 1980, any developer or scheme promoter, that delivers highway infrastructure to be adopted by GCC, must fully comply with the Council's Enhanced Materials and Commuted Sum Policy (MfGS), whereby appropriate materials are specified and the full costs of implementation and future maintenance are factored in to the scheme budget, to limit the long term burden on pedestrian highway asset. Enhanced Materials and Commuted Sum Policy (MfGS), whereby appropriate materials are specified and the full costs of implementation and future maintenance are factored in to the scheme budget, to limit the long term burden on pedestrian highway asset. •All overarching and mode policies will take this policy into account.*
- *All overarching and mode policies will take this policy into account."*

In considering figures PD2 (C) and PD2 (D) above the strategic desire lines, as well as the primary and secondary cycle network, are largely absent from the Scheme Corridor with the exception of the primary route to the east of the Scheme extents on the A4019 and the secondary route that runs along the B4634 Old Gloucester Road. Notwithstanding the above it should be noted that both the primary and secondary routes are closely linked with Strategic Allocations A4 and A7 respectively. As is evidenced in the live planning application for Strategic Allocation A4 cycle provision is proposed to the east of the Scheme's extent, along the primary route both providing for and connecting into the LCWIP desire lines. When considering Strategic Allocation A7 the Golden Valley Development Supplementary Planning Document also shows pedestrian / cycle provision running both north east and south west from the site, along the B4634.

In facilitating the development of Strategic Allocations A4 and A7, as well as providing an active travel corridor along the length of the Link Road and the A4019 (within the extents of the Scheme) the Scheme improves cycle links both within and between existing settlements and proposed development. In combination with the cycle provision proposed by the Strategic Allocations the Scheme ensures that proposed cycle routes are safe and help to form a continuous accessible network accessing town centres, residential areas, employment areas, and routes to schools, facilitating connections into the strategic and LCWIP desire lines.

JCS Infrastructure Delivery Plan

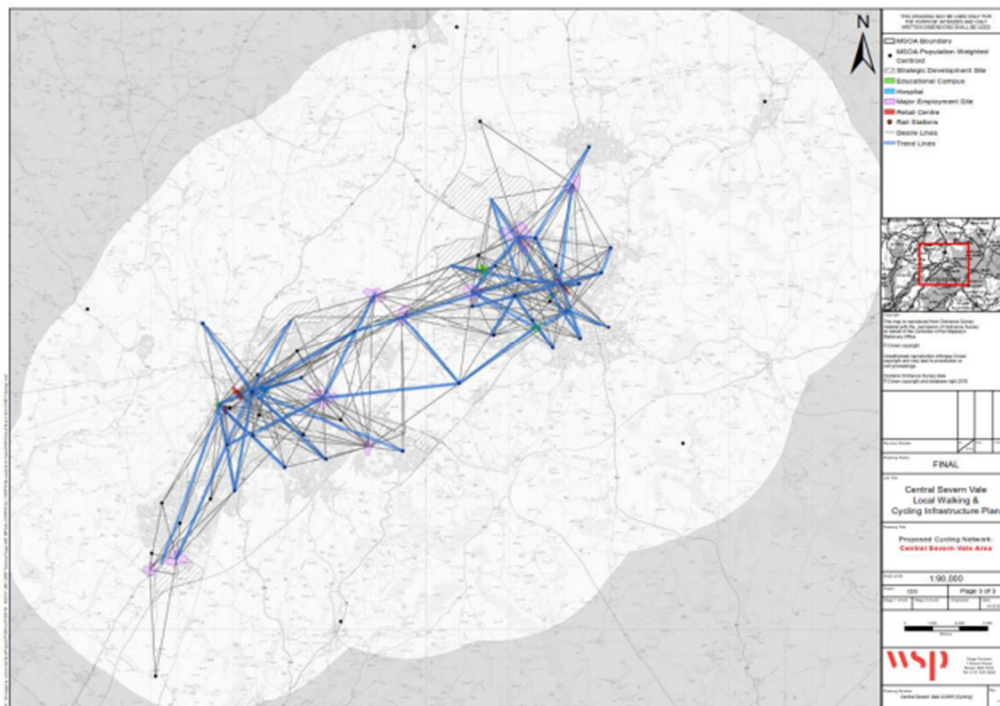
“4.9.6.1 The North West Cheltenham strategic location for development would benefit from, and could help facilitate the delivery of two strategic cycle routes identified within the Central Severn Vale Transport Study (CSVTS) preferred strategy:

- Tewkesbury to North West Cheltenham – this would broadly follow the route of the A4019 Tewkesbury Road past the site.
- Bishops’s Cleeve to North West Cheltenham – one alignment option would be for this route to pass directly through the site.”

In facilitating the development of Strategic Allocation A4 the Scheme enables the provision of the strategic cycle routes identified within the Central Severn Vale Transport Study (CSVTS) preferred strategy.

Central Severn Vale Local Cycling and Walking Infrastructure Plan

Figure 34 – Plan showing trend lines, rationalising the desire line network.



As outlined above and shown in Figure 34 of the Central Severn Vale Local Cycling and Walking Infrastructure Plan the strategic desire lines, as well as the primary and secondary cycle network, are largely absent from the Scheme Corridor with the exception of the primary route to the east of the Scheme extents on the A4019 and the secondary route that runs along the B4634 Old Gloucester Road. Notwithstanding the above in facilitating Strategic Allocations A4 and A7 the Scheme enables the provision of connections into the strategic and LCWIP desire lines through the development of those sites and their active travel provision.

The Cheltenham Plan

Vision Theme A Objectives

- “g) Design places, with a focus on connectivity, that are accessible to all and where barriers to walking and cycling are removed so that active travel and public transport are the default choices;*
- h) Improve health outcomes by promoting and prioritising active travel;”*

Vision Theme C Objectives

- “e) Improve pedestrian and cycle connectivity and permeability throughout the town by creating a network of convenient routes which include multifunctional green spaces that link with the wider countryside, attractive and safe streets and spaces, and measures which reduce the visual and environmental impact of vehicular traffic;”*

“15.19 In line with JCS Policies SD4 and INF1, any new development, including for car parking, will require suitable access and parking for cycles in order to promote a shift to more sustainable modes of transport.”

In providing an active travel corridor along the length of the Link Road and the A4019 (within the extents of the Scheme), along with the provision of a bus lane and bus gates along the A4019 and to serve Strategic Allocation A4, the Scheme improves and facilitates connectivity for walking and cycling routes through both the Scheme active travel provision and the active travel provision of the Strategic Allocations that are unblocked by the Scheme.

Tewkesbury Borough Plan

Policy TRAC2 Cycle Network & Infrastructure

“Cycle infrastructure should be a fundamental consideration in a design-led process for new major development and proposals will be expected to demonstrate this proportionate to the scale of development, including through any Design and Access Statements. This includes contributing towards the objectives of this policy.

The protection and enhancement of the cycle network, infrastructure and facilities across the Borough will be sought through the following measures:

- Safeguarding, developing and promoting a borough-wide network of safe and convenient cycle routes, segregated from motorised traffic where this does not detract from the pedestrian environment and where it confers an advantage to the cyclist in terms of journey directness and cycle trip experience.*
- Promoting and providing safe, well-lit cycle parking, storage, changing facilities and e-bike charging infrastructure at public transport nodes, schools, community facilities, and employment centres; and requiring new development to provide cycle facilities on site where appropriate.*
- Requiring the needs of cyclists to be met in the design of new highway and traffic management schemes.”*

In providing an active travel corridor along the length of the Link Road and the A4019 (within the extents of the Scheme). The scheme will include a segregated cycleway (3m width) and footway (2m width) on the northern side of the A4019 which, with the exception of a short section of

shared use path through Uckington, will extend from the junction of the A4019 with Stanboro Lane in the west through to the Gallagher junction at the eastern end of the Scheme. This active travel corridor will provide connectivity for pedestrians and cyclists between north-west Cheltenham and the junction of the A4019 and Stanboro Lane (west of M5 Junction 10). It will tie into an existing shared use path at the eastern end of the Scheme, and an existing footway at the western end. This will provide safe and legible connections into the existing walking cycling and public transport networks, providing improved links throughout the Scheme's extents. This ensures that the needs of cyclists are met within the Scheme design.

Golden Valley Supplementary Planning Document

"D2. Deliver new direct pedestrian and cycle connections to existing communities and facilities

- *The site sits at the apex of a corridor exhibiting the highest propensity for cycle use in the county, in terms of commuter trips and economic benefits, including the B4063 as a key cycling corridor to Gloucester. The site must capitalise upon this opportunity.*
- *New pedestrian and cycle connections will be created with existing routes and paths in neighbouring communities. These walking and cycling routes will be direct, safe, well lit, comfortable and attractive. This will help to ensure new development at The Golden Valley Development is fully integrated with its surroundings. The West Cheltenham Cycle and Walking improvement scheme should be referenced in making proposals to improve these more strategic connections.*
- *The following opportunities exist for the establishment of new pedestrian and cycle connections along the existing Golden Valley Development boundary which will ensure good linkages are established with Coronation Square, Springbank Community Centre, All Saints Academy, Gloucester College Hester's Way community centre, Cheltenham Station and Cheltenham town centre and other important local facilities and locations:*
 - *In the vicinity of Meadow Close, towards the southern end of Fiddler's Green Lane;*
 - *On the east-west axis of Niven Courtyard;*
 - *At the existing agricultural access point opposite Lazenby Court;*
 - *At the junction with Telstar Way;*
 - *South of Beverley Croft;*
 - *At the existing stile off Beverley Croft;*
 - *At Springbank Road open space;*
 - *Adjacent to the Terry Ashdown Allotments off Henley Road;*
 - *Opposite Gloucester Road to link with the existing foot and cycle path;*
 - *At the northern bend in Henley Road, either side of the pylons;*
 - *Off Hope Orchard;*
 - *Off Harry Yates Way at Wheatlands Drive; and*
 - *At Pilgrove Way open space.*
- *Other points of pedestrian and cycle connections will be provided around the remainder of the site perimeter to take account of Public Rights of Way, footpaths and other desire lines.*
- *The site will have both commuter and leisure trails for cycling. Routes adjacent to main streets will have segregated walking and cycling infrastructure. A high quality of pedestrian / cycle infrastructure will be targeted. Where possible, this should meet or exceed optimum design guidance.*

- *Routes will need to accommodate provision for electric bikes (or low carbon alternatives), subject to legislation and these modes will need to be a key consideration within the design.*
- *The site will facilitate improved connections to Springbank and Hester's Way, Hayden Hill, Cheltenham Station and the town centre beyond, in accordance with the Connecting Cheltenham strategy. A continuous and high quality off-carriageway link to Cheltenham Rail Station will be provided linking to the site from the southern access and via Telstar Way and the A40. Signage and road marking improvements for cyclists will be considered within existing residential areas to further encourage and facilitate sustainable travel via direct routes.*
- *Fiddler's Green Lane will provide dedicated cycle connections towards Arle Court roundabout, the park and ride and areas to the south of the site, further strengthening the connections to the surrounding area.*
- *Opportunities to deliver a continuous cycle path and onward connection from Gloucester, through Cyber Central UK and Cheltenham and up to Bishops Cleeve should be explored. Potential links to Boddington bridleway 25 Should also be explored."*

In providing an active travel corridor along the length of the Link Road and the A4019 (within the extents of the Scheme) the Scheme provides access for Strategic Allocation A7 onto pedestrian and cycle connections to key centres and the wider infrastructure network. Moreover, in unlocking the Strategic Allocation the Scheme also facilitates the provision of the proposed active travel provision outlined within the Golden Valley Development SPD.

Conclusion

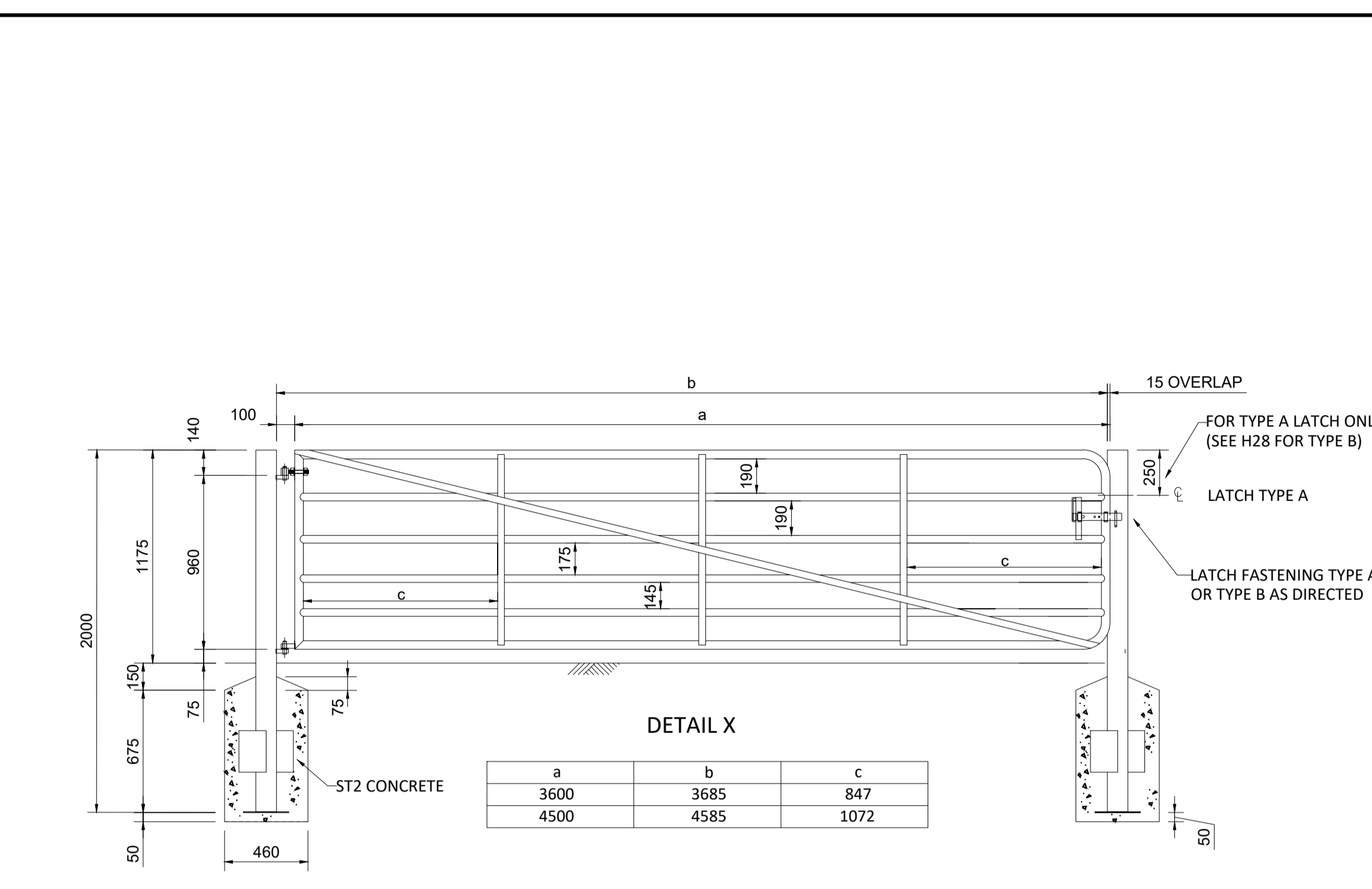
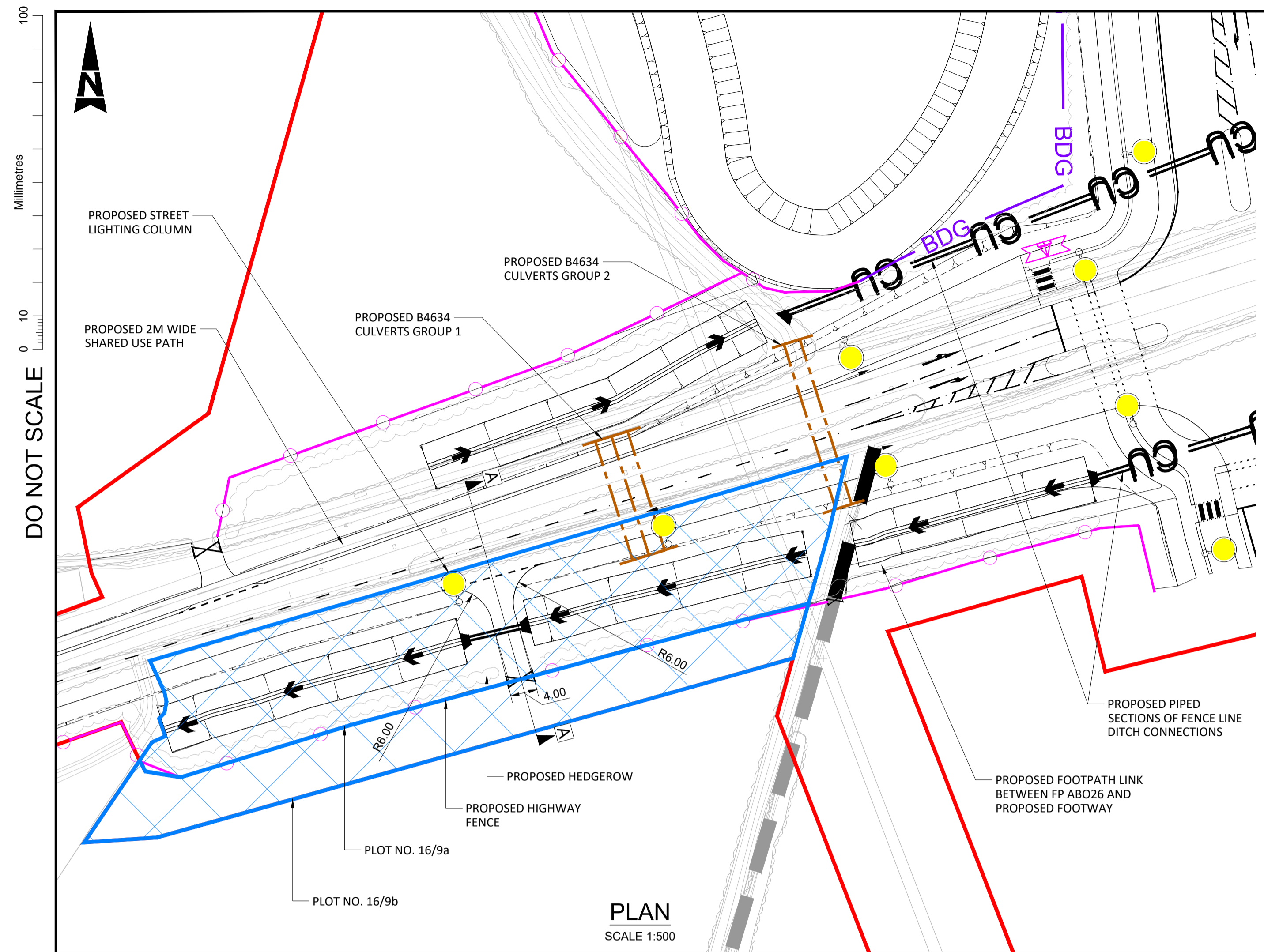
Overall, in considering the Scheme's proposed active travel provision and its compliance with Local Plan policy it is the Applicant's position that the Scheme adheres to all relevant policies, when considering the extents of the Scheme. Furthermore, when considering the objectives of the Scheme and its intent to unlock Strategic Allocations A4 and A7 the Scheme is also considered to facilitate the wide active travel provision associated with the Strategic Allocation sites through enabling the sites to come forward for development and compliant with the relevant Local Plan policies relating to those sites.

In achieving the Scheme objective to unlock and facilitate the Strategic Allocations adopted by the Joint Core Strategy the Scheme delivers essential transport infrastructure that could not be delivered by the relevant allocated sites in isolation. Whilst it is not the purpose of the Scheme to deliver all the transport infrastructure required to mitigate the impacts of the individual development sites it does provide the necessary infrastructure and linkages to enable these sites to come forward and to provide their own infrastructure, where it would be reasonable to expect that this would be delivered by the individual developments themselves.

When considered as a combined package of works the active travel provision across the M5 J10 Improvements Scheme and Strategic Allocations A4 and A7 ensure that pedestrian, cycling and public transport links are improved across the area, helping to form a continuous and accessible network accessing town centres, residential areas, employment areas, and routes to schools, facilitating connections into the strategic and LCWIP desire lines.

In complying with local plan policy relating to active travel provision and contributing to a beneficial impact on the local transport networks the Scheme also satisfies the paragraph 5.211 of the NPSNN (2014).

Appendix B. Response to Action Point 9: Agricultural Vehicle swept path analysis for Mr Hadley's land



NOTE: DIMENSIONS SHOWN ARE IN MILLIMETRES

NOTES:

- ALL DIMENSIONS ARE IN METRES UNLESS OTHERWISE STATED.
- THIS DRAWING IS BASED ON PRELIMINARY DESIGN AND ALL DETAILS WILL BE SUBJECT TO DETAILED DESIGN AT A LATER STAGE.

SAFETY, HEALTH AND ENVIRONMENTAL INFORMATION

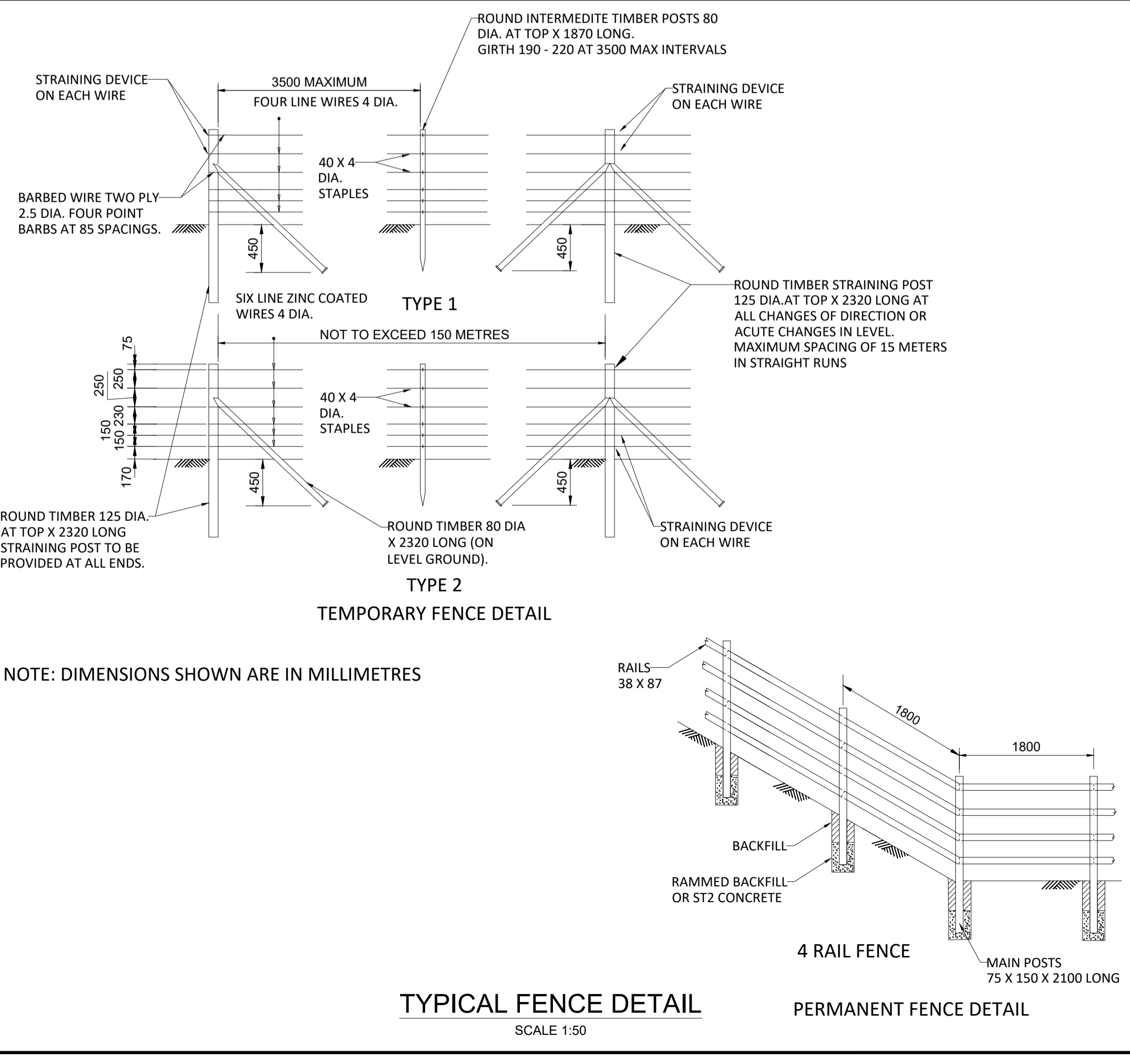
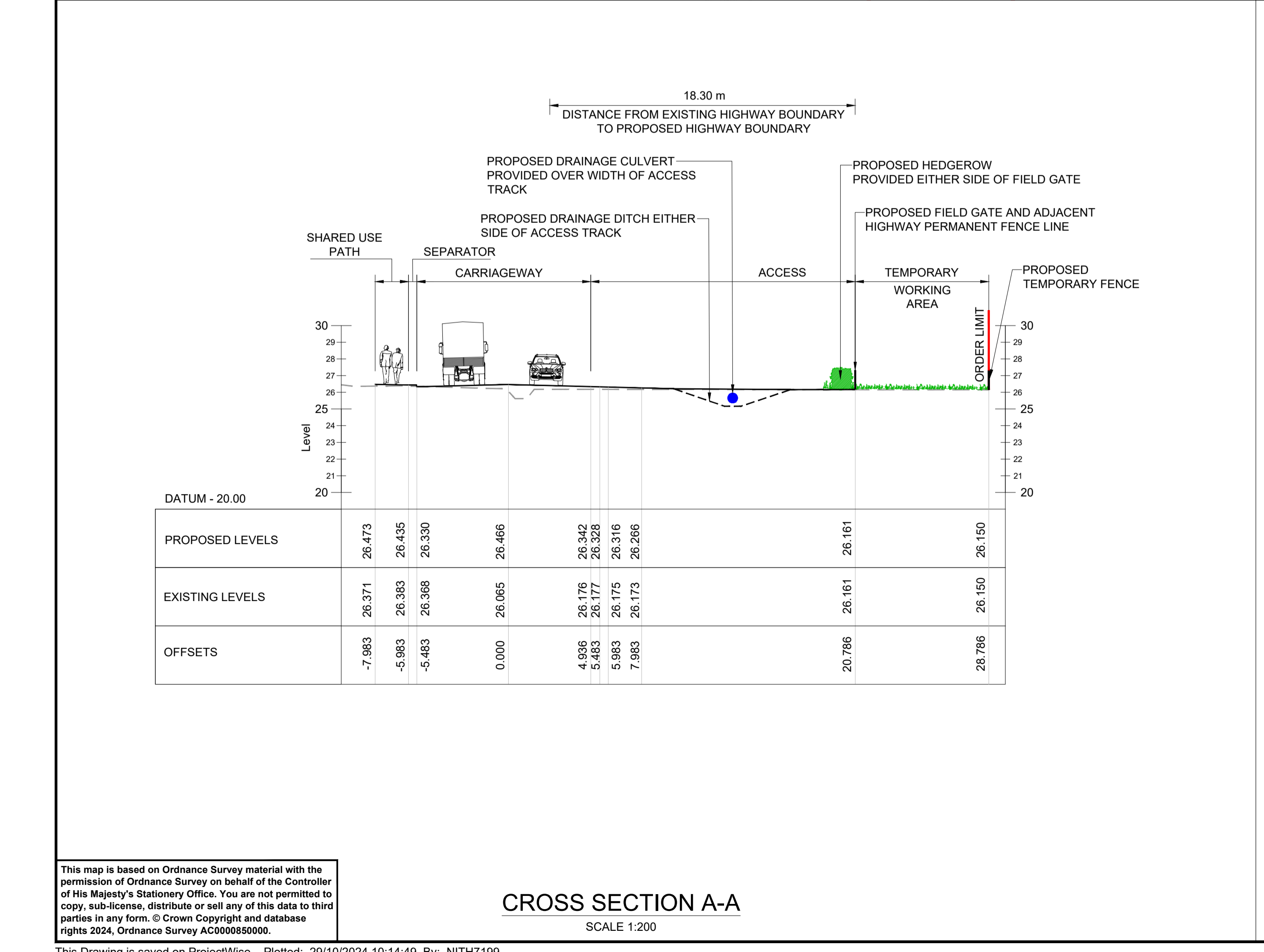
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Construction
(Enter "None" if applicable)

Maintenance / Cleaning
(Enter "None" if applicable)

Use
(Enter "None" if applicable)

Decommissioning / Demolition
(Enter "None" if applicable)



NOTE: DIMENSIONS SHOWN ARE IN MILLIMETRES

Description	Status	Revision	Drawn	Checked	Reviewed	Authorised	Issue Date

FINAL ISSUE

Status	Revision	Drawn	Checked	Reviewed	Authorised	Issue Date
A1	CO1	VN	CJ	CCR	LJ	28/10/24

APPROVED - PUBLISHED A1

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Gloucestershire
COUNTY COUNCIL

Project Title
M5 Junction 10 Improvements Scheme

Drawing Title
**LAND OWNER CONSULTATION PLAN
LINK ROAD (DF3 LAYOUT)
GR364928**

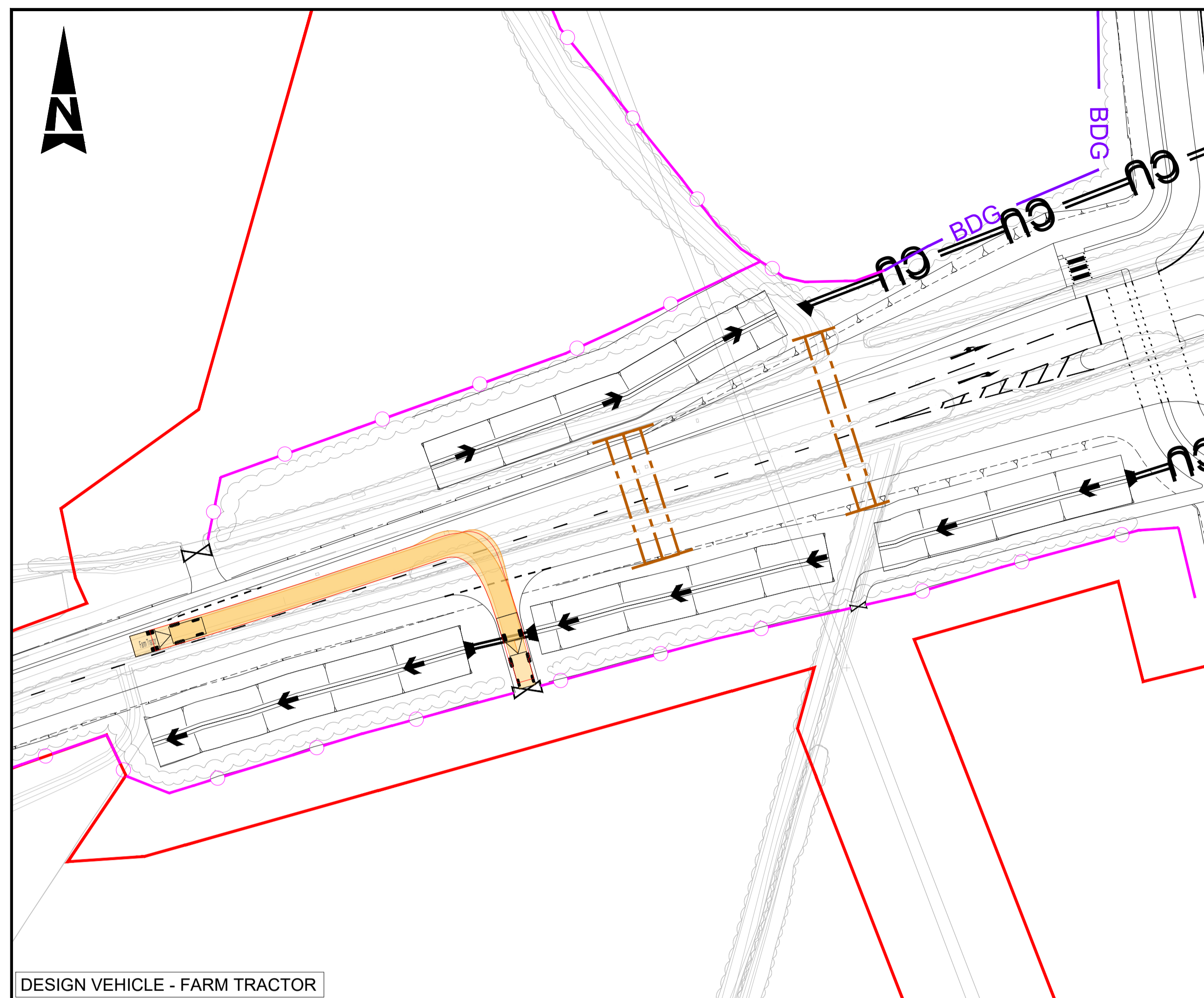
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L2	- SK	- CH	- 000001
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Original Size	Scale	Project Ref. No.	Sheet
A1	AS SHOWN	5197035	1 of 1
Rev.			
C01			

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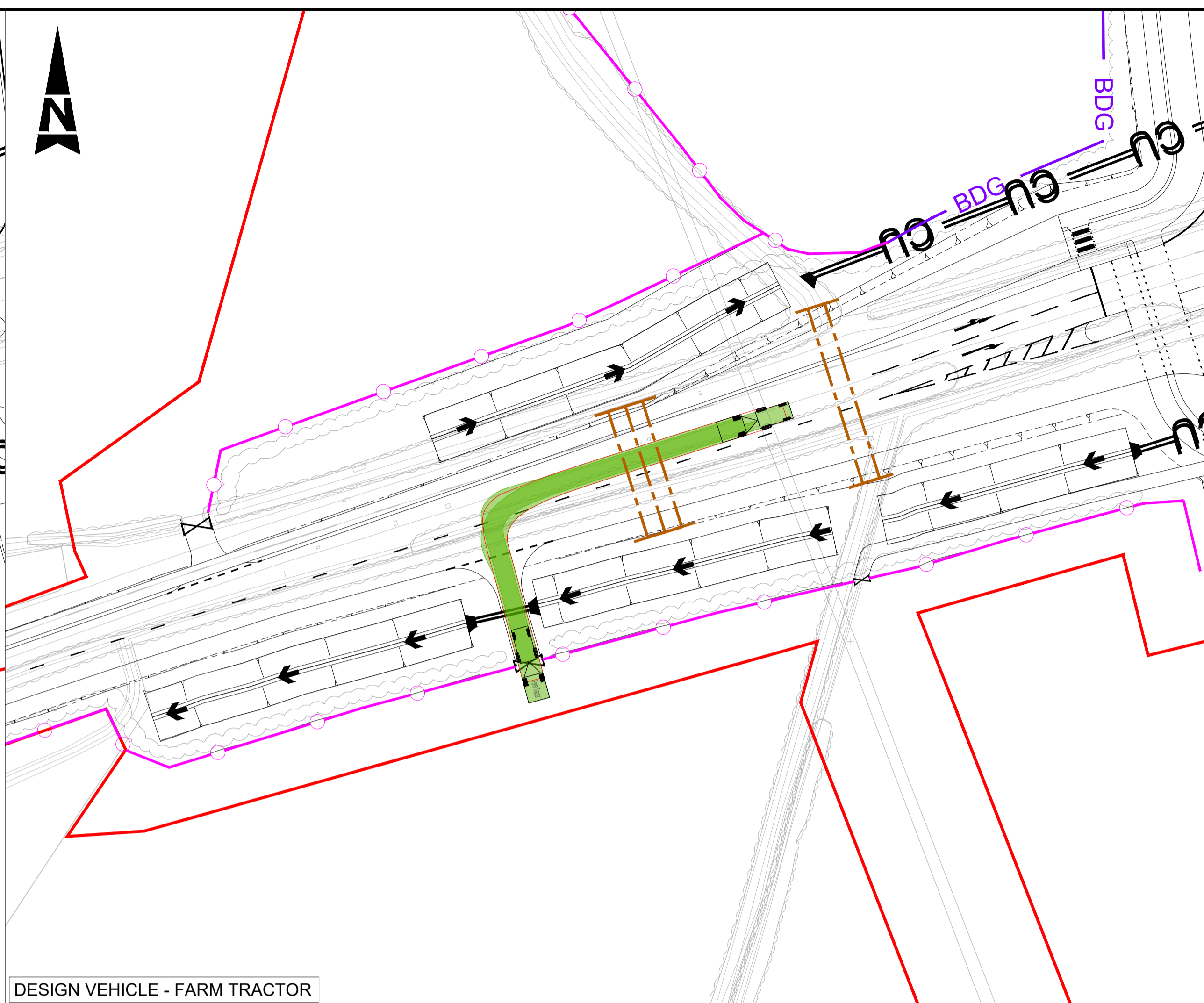
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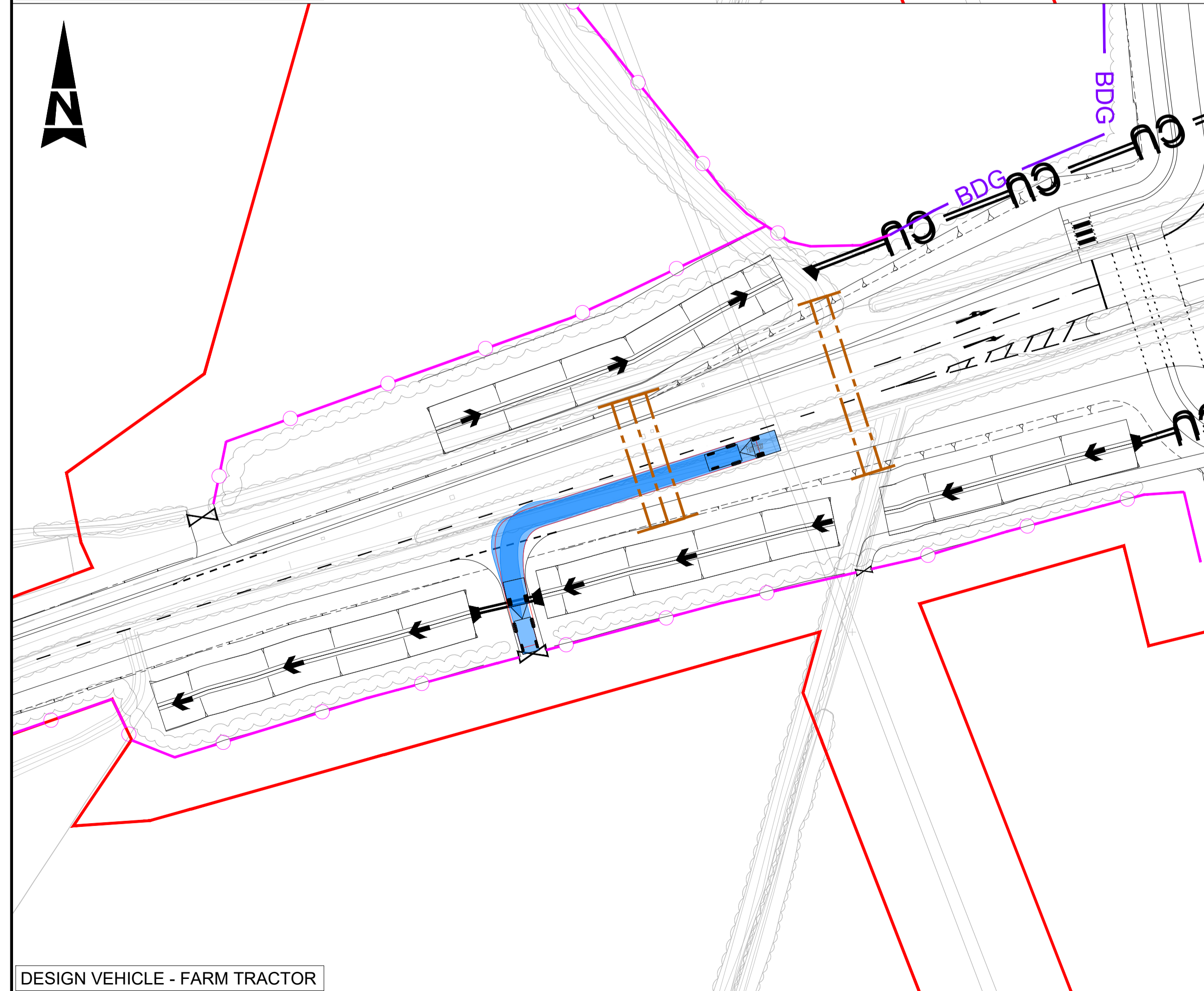
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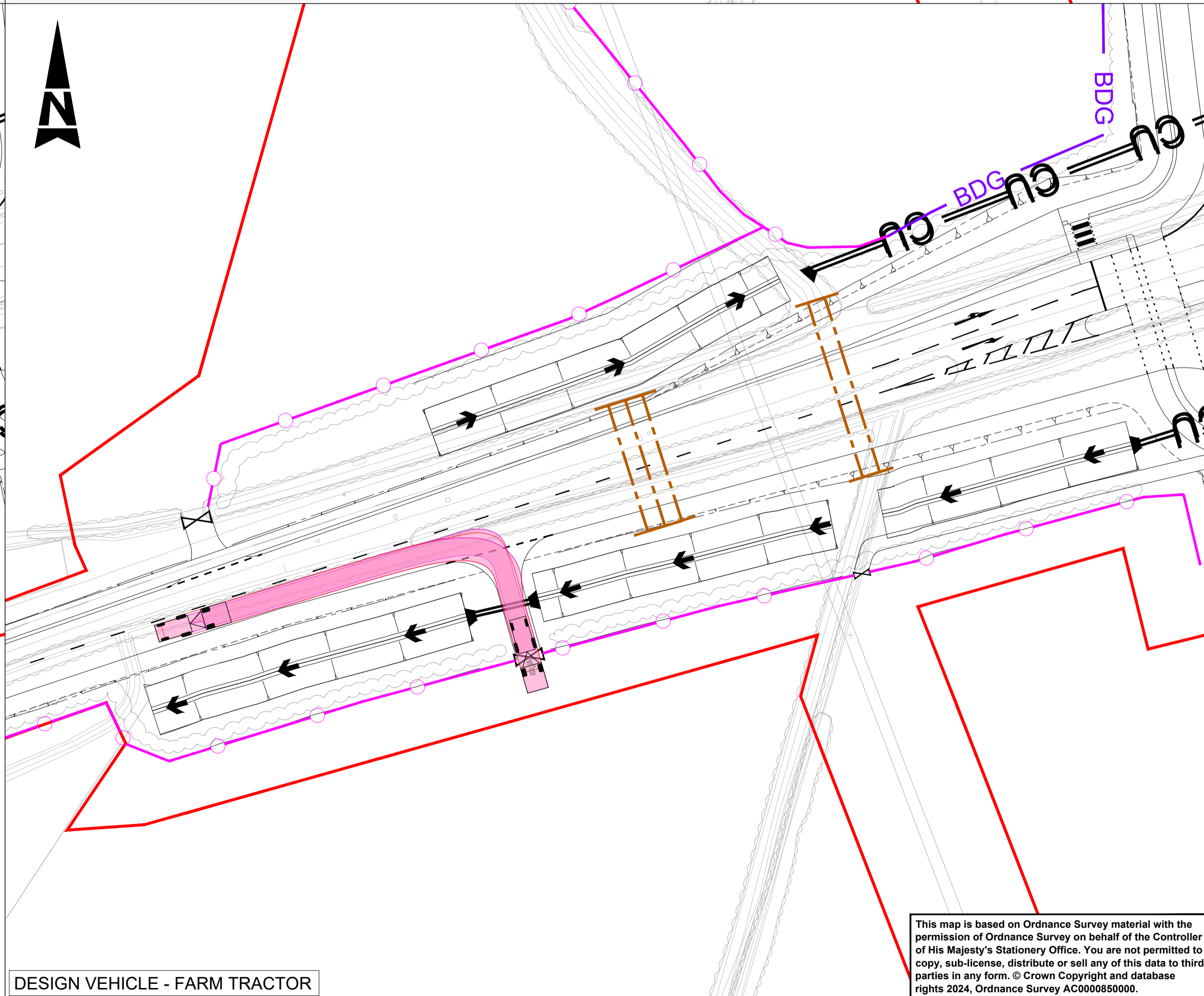
DESIGN VEHICLE - FARM TRACTOR



DESIGN VEHICLE - FARM TRACTOR



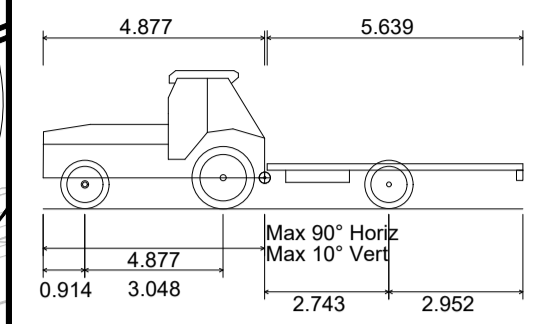
DESIGN VEHICLE - FARM TRACTOR



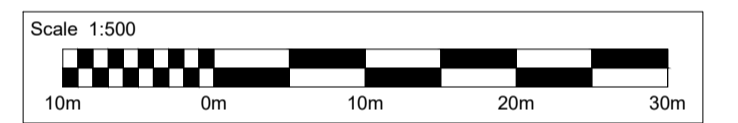
DESIGN VEHICLE - FARM TRACTOR

NOTE

1. ALL DIMENSIONS ARE IN METRES UNLESS OTHERWISE STATED.



Farm Tractor
 Overall Length 10.572m
 Overall Width 3.048m
 Overall Body Height 3.048m
 Min Body Ground Clearance 0.586m
 Max Track Width 3.048m
 Lock to lock time 4.00s
 Kerb to Kerb Turning Radius 5.700m



Description	Status	Revision	Drawn	Checked	Reviewed	Authorised	Issue Date
FOR REVIEW	S3		NKRP	CJ	CCR	---	23/10/24
FINAL ISSUE	A1		VN	CJ	CCR	LJ	29/10/24

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M5 Junction 10 Improvements Scheme

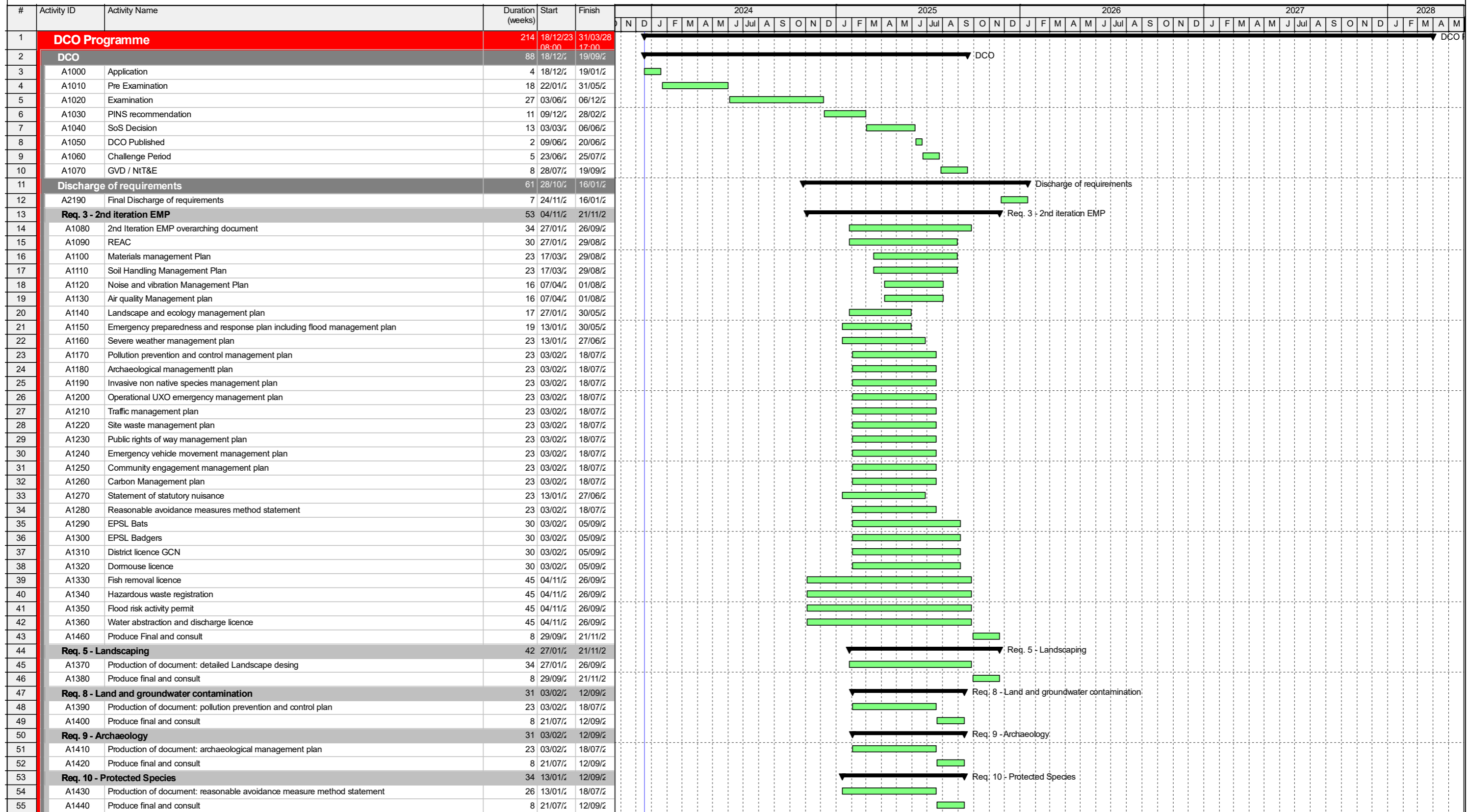
**SWEPT PATHS OF GR364928
 ACCESS AND B4634
 FARM TRACTOR**

Drawing Number	Project	Originator	Volume
GCCM5J10	L2	ATK	GEN
		- SK - CH - 000003	
Original Size	Scale	Project Ref. No.	Sheet
A1	1:500	5197035	1 of 1
			Rev: C01

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Appendix C. Response to Action Point 13: Construction Programme GANTT Chart

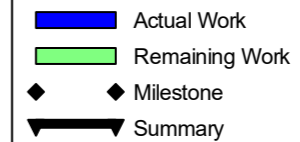
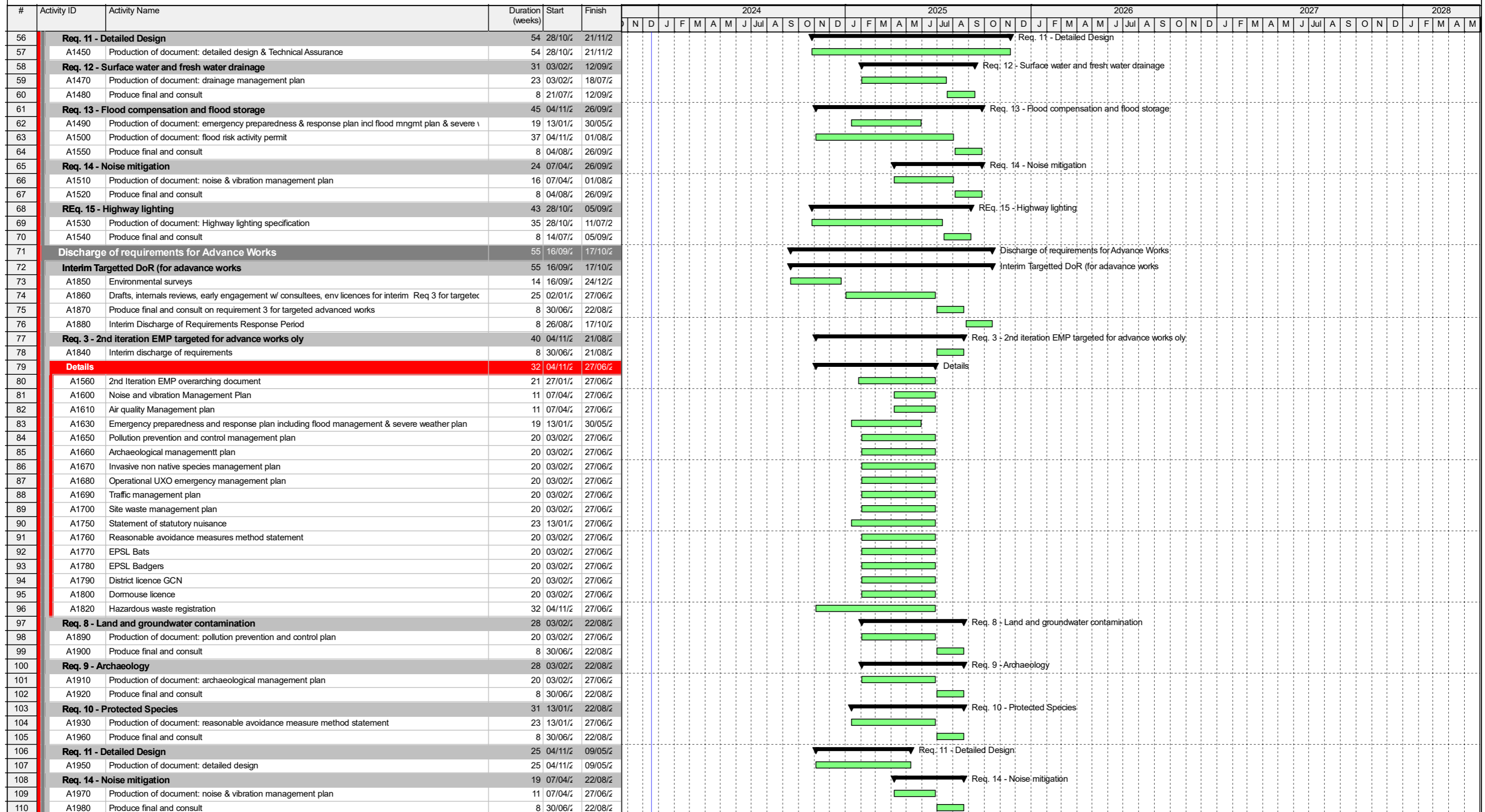
M5J10



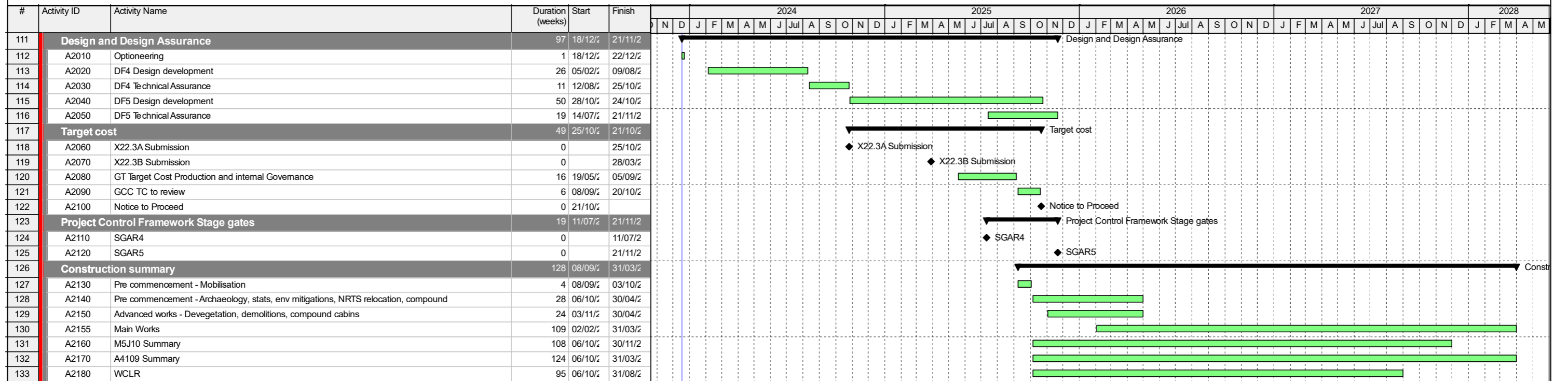
Project: DCO Programme
Programme Filter: TASK filter: All Activities
Data Date: 18/12/23
Page: 1 of 3

- █ Actual Work
- █ Remaining Work
- ◆ Milestone
- Summary

M5J10



M5J10

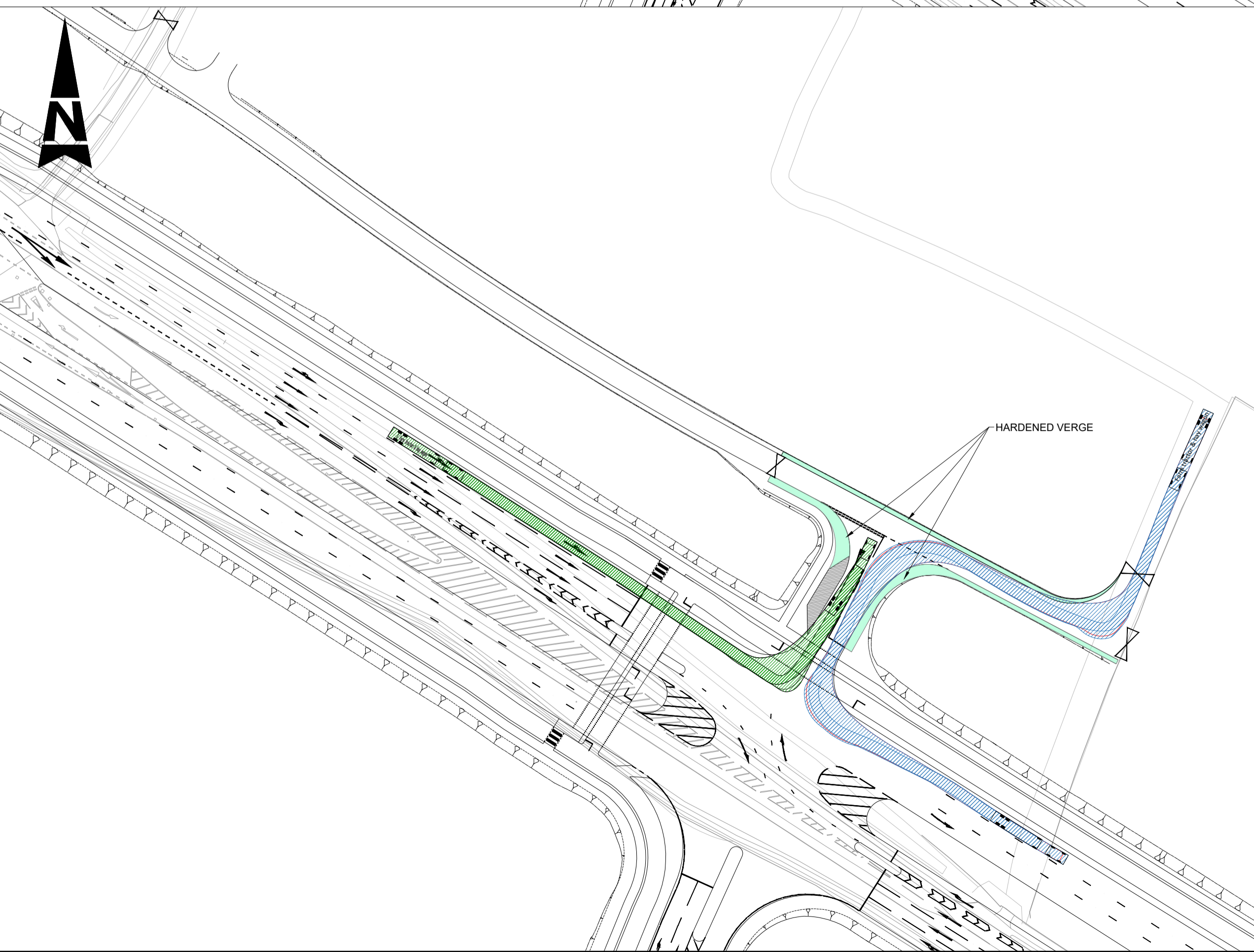
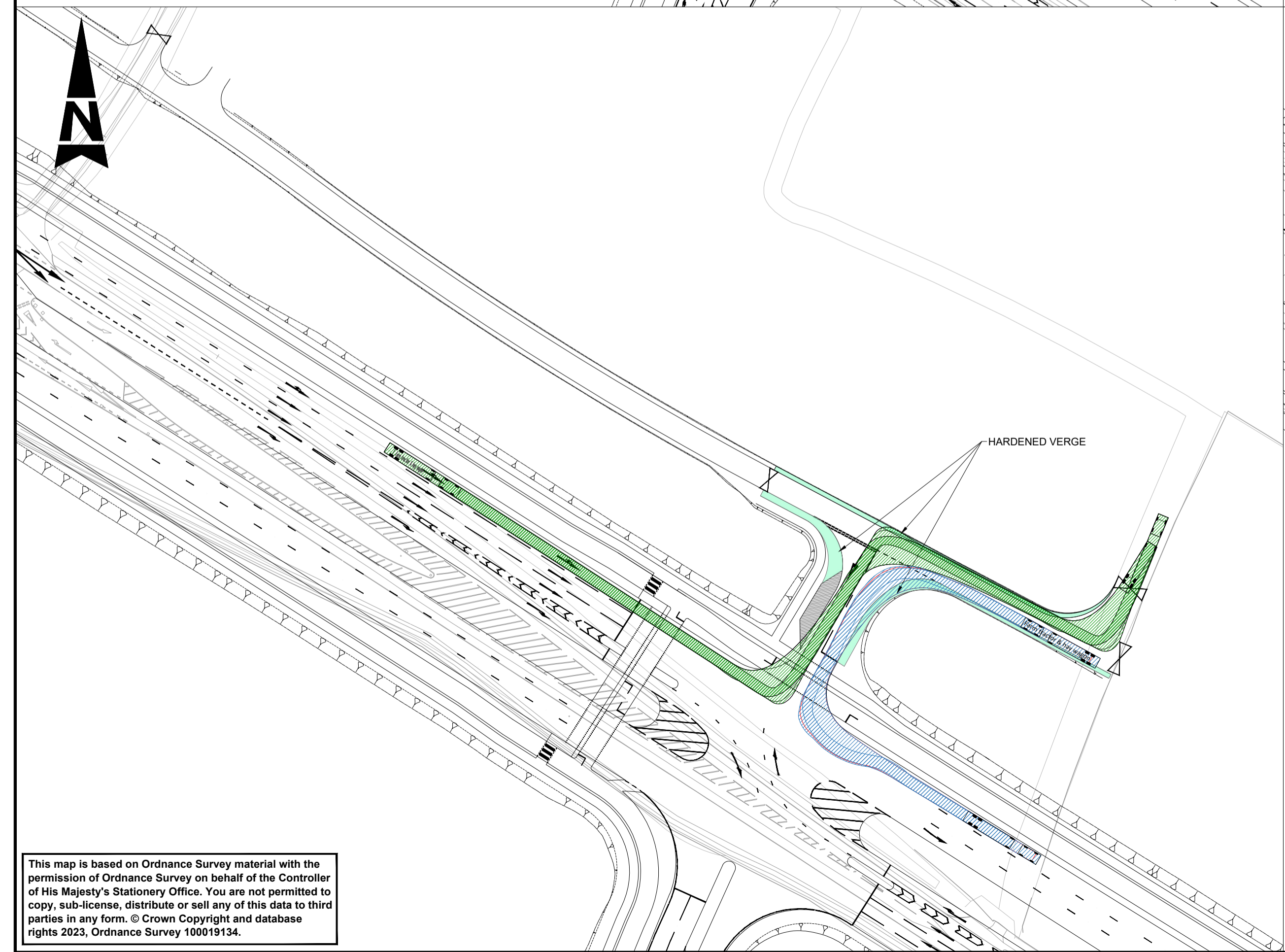
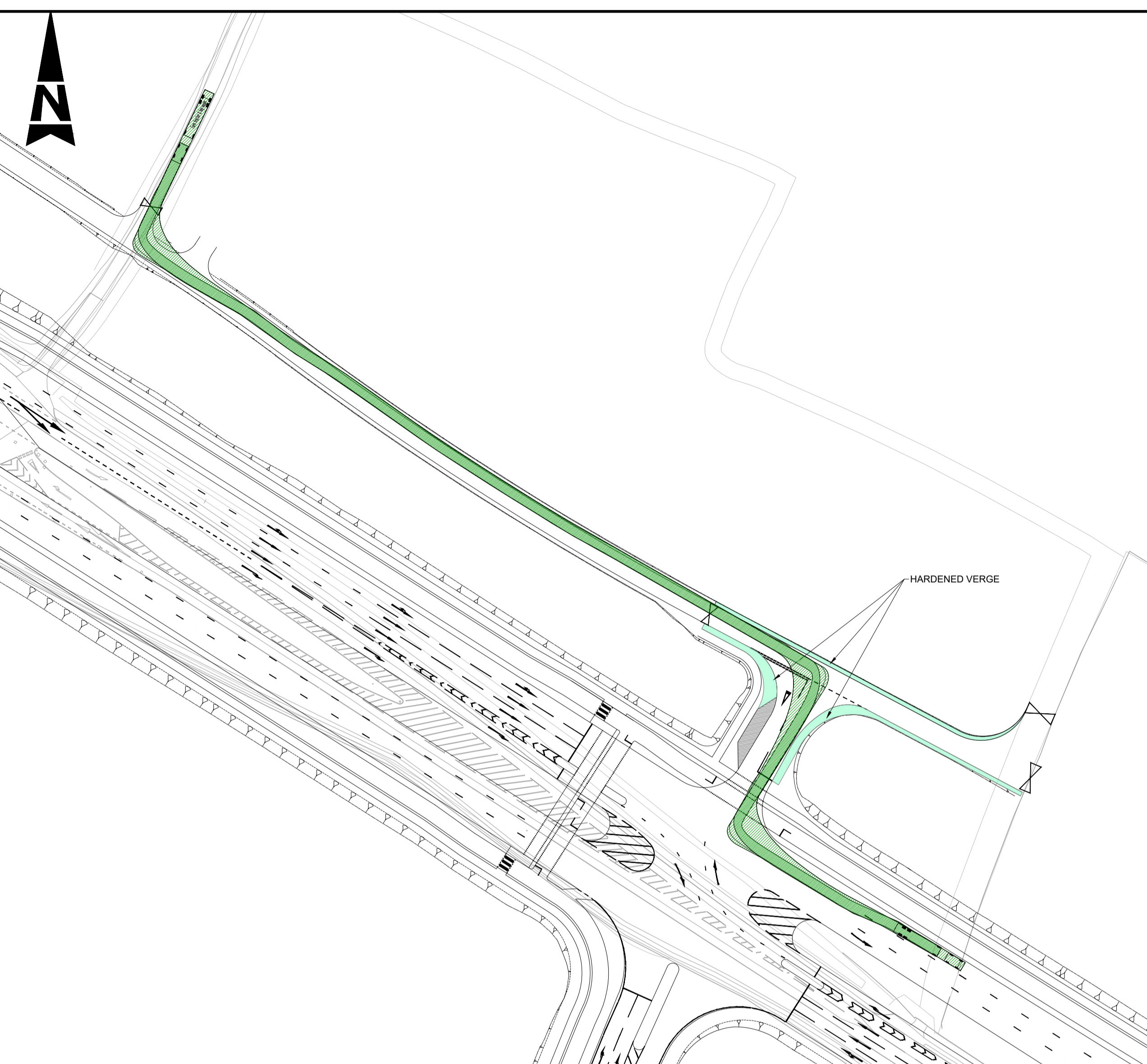
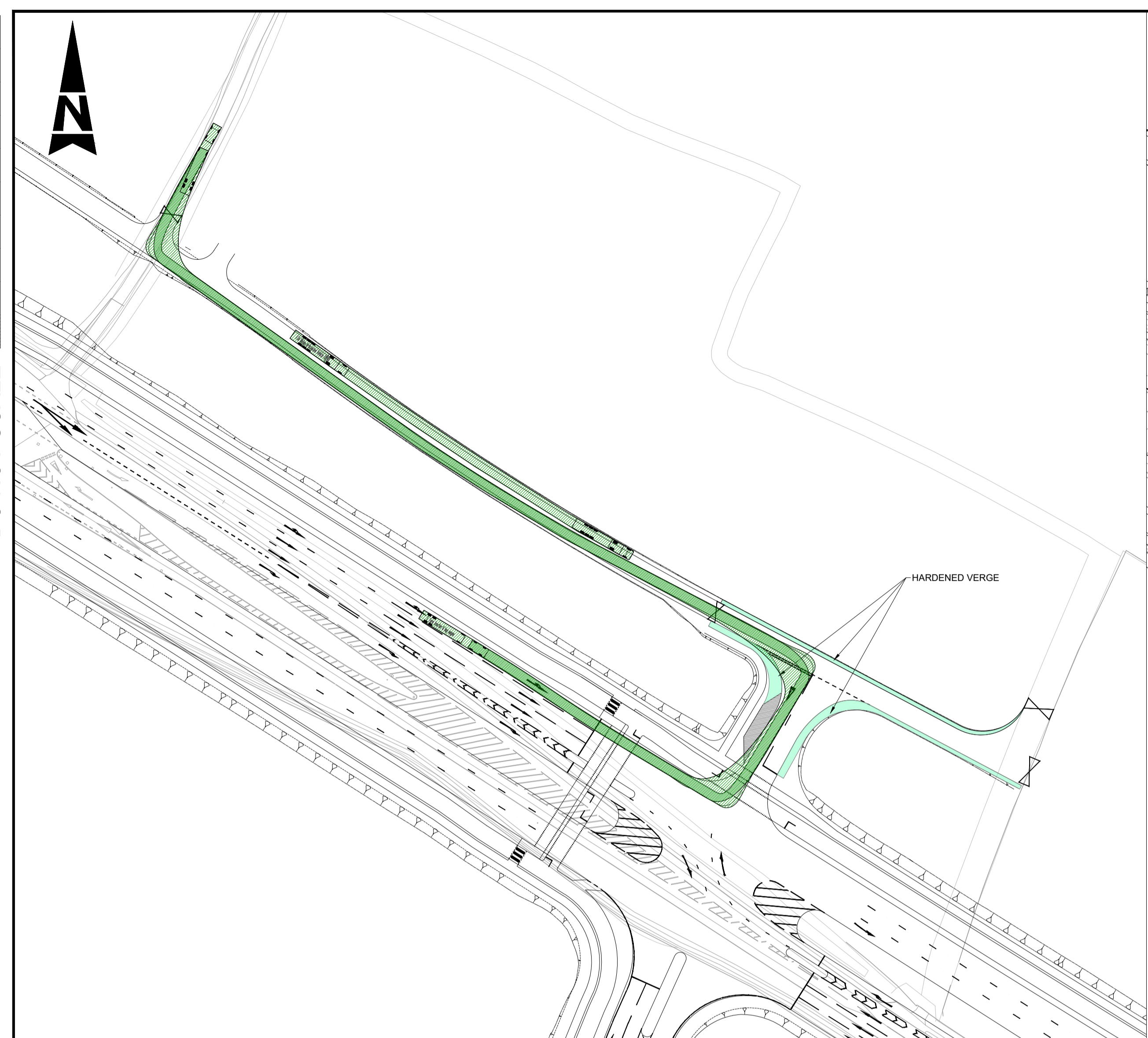


Appendix D. Response to Action Point 24: Agricultural access into the Bruton and Counsell land

DO NOT SCALE

Millimetres

0 10 100



NOTES

1. ALL DIMENSIONS ARE IN METRES UNLESS OTHERWISE STATED.
2. SWEEP PATH ANALYSIS WAS UNDERTAKEN FOR A NUMBER OF DIFFERENT VEHICLE TYPES. THE FARM TRACTOR WITH HAY WAGON WAS FOUND TO HAVE THE MOST ONEROUS MOVEMENTS HENCE HAS BEEN SHOWN ON THIS PLAN AS THE WORST CASE SCENARIO.

VEHICLE DETAILS :

Farm tractor & hay wagon

Overall Length 19.020m
Overall Width 2.500m
Overall Body Height 0.438m
Min Body Ground Clearance 0.398m
Max Track Width 2.500m
Lock to lock time 4.00s
Kerb to Kerb Turning Radius 4.620m

Description	Status	Revision	Drawn	Checked	Reviewed	Authorised	Issue Date
First Issue	A1	C01	NKRP	CJ	CCR	LJ	30/09/24

APPROVED - PUBLISHED A1

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Gloucestershire
COUNTY COUNCIL

Project Title
M5 Junction 10 Improvements Scheme

Drawing Title
SWEEP PATHS OF A4019/LINK ROAD JUNCTION FARM TRACTOR AND HAY WAGON

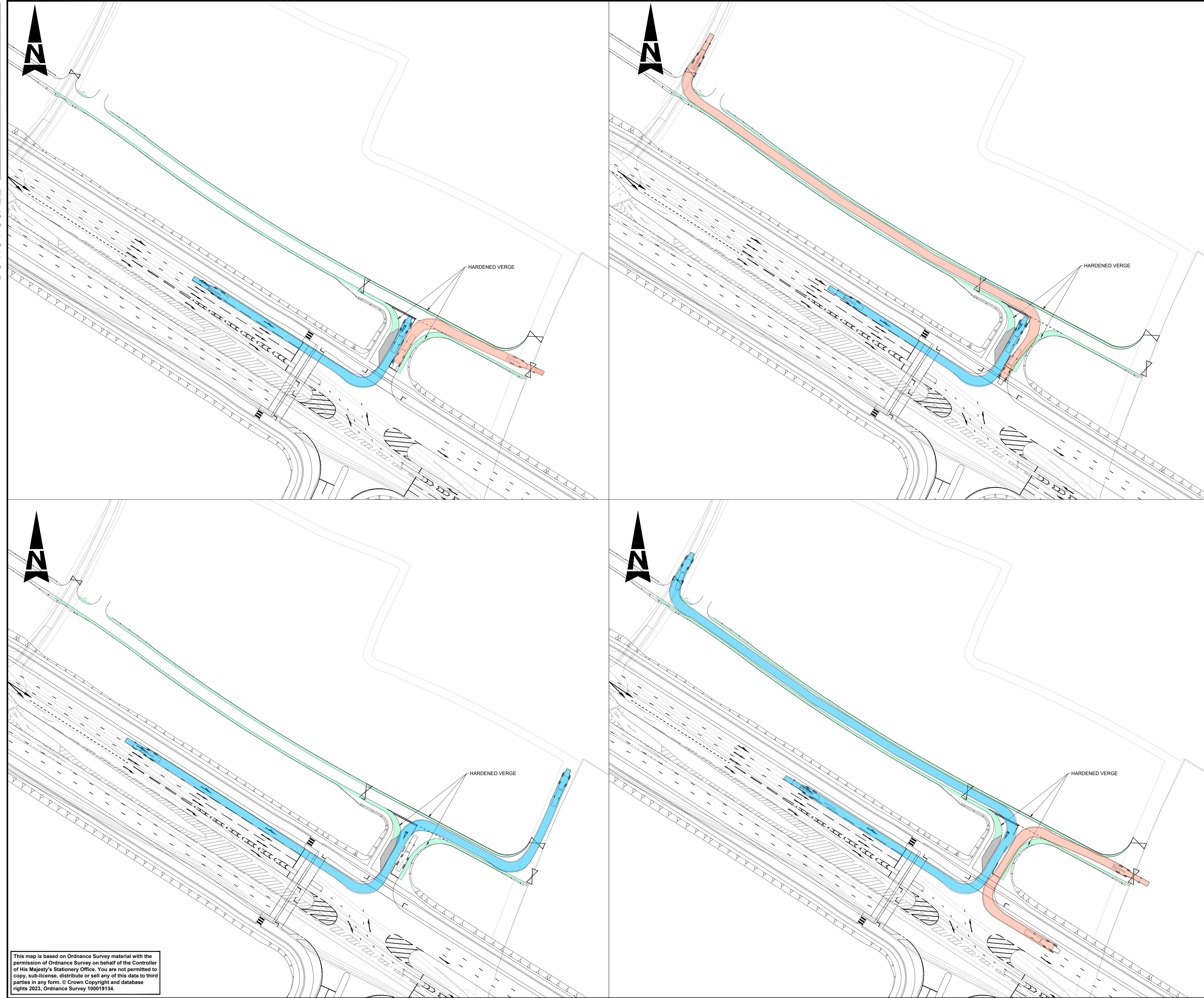
Drawing Number	Project	Originator	Volume
GCCM5J10	J2	ATK	HGN

- SK - CH - 000006

Location	Original Size	Scale	Project Ref. No.	Sheet	Number	Rev	Rev
A1	A1	NTS	5197035	1 of 1	1	C01	

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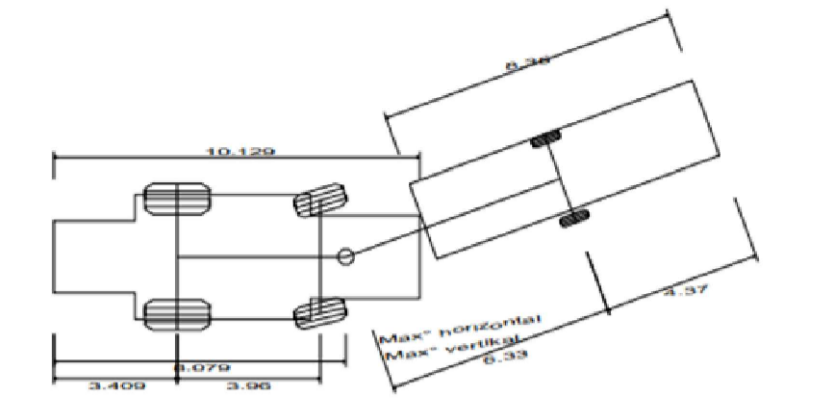
100
Millimetres
0 10
DO NOT SCALE



NOTES

1. ALL DIMENSIONS ARE IN METRES UNLESS OTHERWISE STATED.

VEHICLE DETAILS :



Massey Ferguson 7278 combine harvester and trailer
 Overall Length 18.779m
 Overall Width 3.460m
 Overall Body Height 0.805m
 Min Body Ground Clearance 0.400m
 Max Track Width 4.060m
 Lock to lock time 5.00s
 Kerb to Kerb Turning Radius 12.770m

Description						
Status	Revision	Drawn	Checked	Reviewed	Authorised	Issue Date
Description						
Status	Revision	Drawn	Checked	Reviewed	Authorised	Issue Date
Description						
Status	Revision	Drawn	Checked	Reviewed	Authorised	Issue Date
Description						
Status	Revision	Drawn	Checked	Reviewed	Authorised	Issue Date

Description						
FIRST ISSUE						
Status	Revision	Drawn	Checked	Reviewed	Authorised	Issue Date
A1	G01	NKRP	CJ	CCR	LJ	30/09/24

Drawing Suitability: APPROVED - PUBLISHED Status: A1

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Client
Gloucestershire
 COUNTY COUNCIL

Project Title
M5 Junction 10 Improvements Scheme

Drawing Title
SWEPT PATHS OF A4019/LINK ROAD JUNCTION COMBINE HARVESTER AND TRAILER

Drawing Number	Project	Originator	Volume
GCCM5J10	J2	ATK	HGN
		- SK- CH-	000008
Location	Type	Role	Number
Original Size: A1	Scale: NTS	Project Ref. No: 5197035	Sheet: 1 of 1 Rev: C01

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Appendix E. Response to Action Point 31: GCC Consultation Response

Cheltenham Borough Council
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Municipal Offices
Promenade
Cheltenham Glos
GL50 1PP

Highways Development
Management
Economy Environment and
Infrastructure
Shire Hall
Westgate Street
Gloucester
GL1 2TG

Date 12 September 2024
Your ref: 24/01268/OUT
Ask for: Simon Shapland

Dear Nicole Golland

**TOWN AND COUNTRY PLANNING ACT 1990
(DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND) ORDER 2015
ARTICLE 18 CONSULTATION WITH HIGHWAY AUTHORITY**

PROPOSAL: Outline planning permission (with all matters reserved) for a severable development to provide the following severable elements: flexible commercial uses (Use Class E and Sui Generis); healthcare centre (Use Class E); flexible community uses (Use Class F); new homes (Use Class C3); other associated infrastructure

LOCATION: Land At West Cheltenham Southern Parcel Fiddlers Green Lane Cheltenham Gloucestershire

Gloucestershire County Council, the Highway Authority acting in its role as Statutory Consultee has undertaken a full assessment of this planning application. Based on the appraisal of the development proposals the Highways Development Management Manager on behalf of the County Council, under Article 18 of the Town and Country Planning (Development Management Procedure)(England) Order, 2015 recommends that this application be **deferred**.

The justification for this decision is provided below.

Summary

The indicative masterplan for this application and the adjacent HBD application are not compatible in terms meeting the Golden Valley objectives for active travel and vehicle links. This lack of coordination is being driven by commercial land issues, which are not a material planning consideration. However, Policy SA1 of the Joint Core Strategy (JCS) refers to the requirement for a comprehensive masterplan. Ideally this should deal with internal and external Active Travel, Public Transport strategy, vehicle access, parking provision and parking restrictions between this application site and the adjacent HBD planning application. However, as a minimum it should address walking, cycling and vehicle access routes, otherwise it likely to prejudice the sustainable delivery of the entire allocation.

Email: [REDACTED]

The proposed M5 Junction 10 south facing slips roads scheme enables the redistribution of a significant amount of strategic traffic travelling between M5 Junction 11, the A40, Princess Elizabeth Way, Old Gloucester Road, Gloucester Road and north Cheltenham via the new Junction 10 slips roads. This redistribution significantly reduces traffic on these local roads. The West Cheltenham and North West Cheltenham growth allocations are unable to mitigate their severe cumulative impacts on these links between the A40 and A4019 and are to some extent reliant on delivery of the M5 Junction 10 scheme and the relief it provides. In the absence of the Junction 10 scheme, the County Council is recommending that a maximum total of development from the west Cheltenham and north west Cheltenham allocations cumulatively be restricted to 1711 residential units and 58,280 sqm of employment GFA.

The traffic modelling exercise apportioned this level of growth between West and North West Cheltenham in the manner set out below:

- West of Cheltenham: 481 dwellings, 34,845 sqm employment
- Elms Park: 1,230 dwellings, 23,435 sqm employment

However, it should be noted that individual sites will be considered on a case-by-case basis, as different sites will have different impacts depending upon what order they are consented and implemented. That is a decision for the respective LPA's to make, however the County Council can help test different scenarios.

The County Council are currently revising their methodology for funding this package of works and any planning consent on this site cannot come forward until there is a strategic solution to the cumulative impact of growth on the local road network.

The prospective developers in the west of Cheltenham area correctly point out that their schemes have a lesser impact at Junction 10 of the M5, when compared to the Elms Park proposal. However, this is a misunderstanding of the purpose and benefits of the Junction 10 improvement scheme, which actually provides relief at local roads elsewhere on the network such as the A40 Arle Court, Benhall roundabout, Princess Elizabeth Way, Coronation Square, Kingsditch roundabout etc.

There is some further information required concerning active travel, public transport, local road improvements, road safety, parking controls and travel plans as set out below.

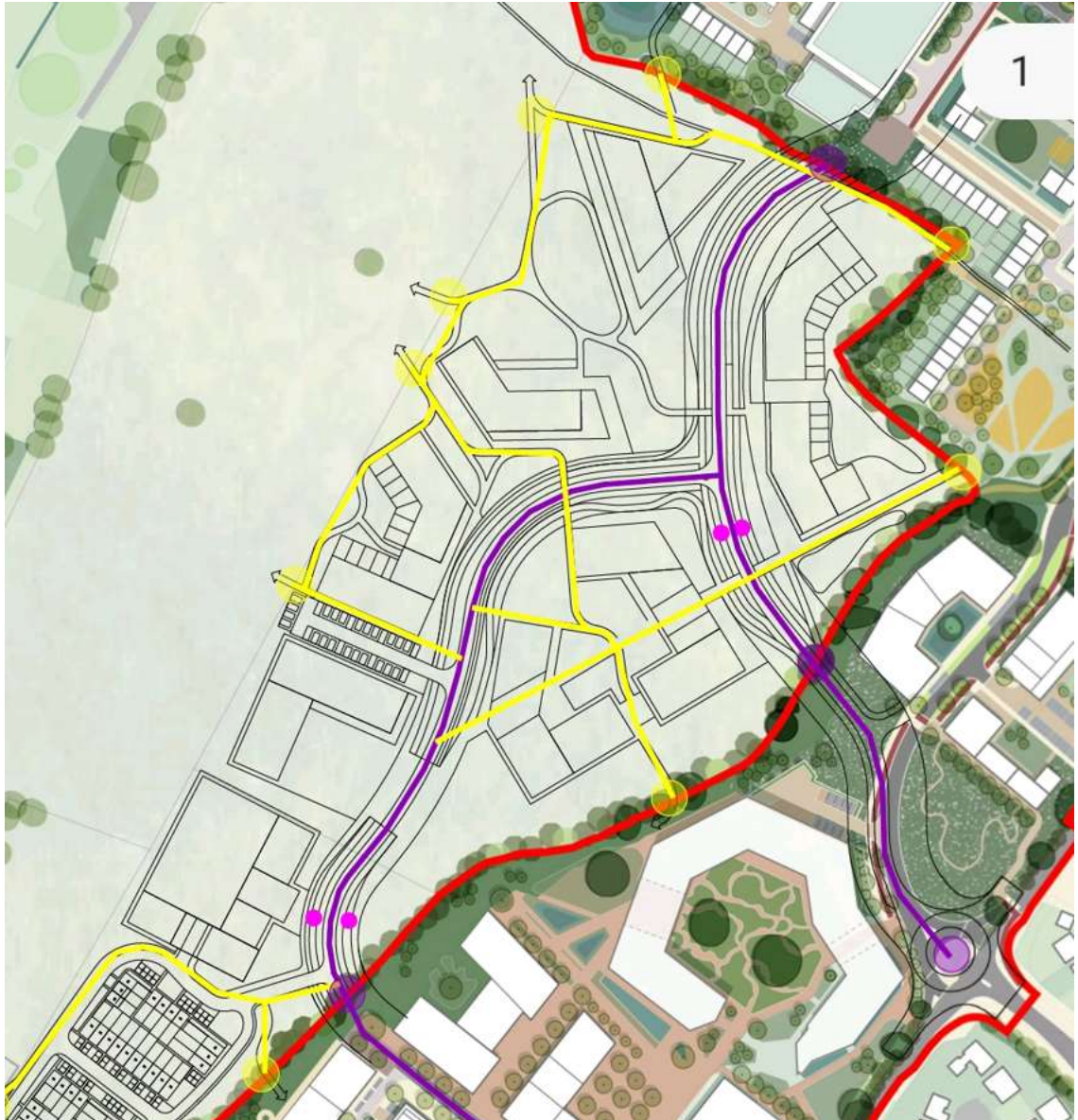
Internal Active Travel

The Golden Valley Supplementary Planning Document (SPD) sets out that a key objective of the GV Development is to deliver an *“integrated and connected extension of West Cheltenham through the establishment of an open and permeable network of streets, a connected network of green off-road routes encouraging greater walking and cycling; the design and delivery of streets and junctions which prioritise the needs of people and sustainable modes”*.

The Transport Assessment (TA) indicates that *“Three all movement accesses are proposed along with ten active travel accesses. The proposed accesses have been designed to ensure a high level of permeability and accessibility for the site as well as providing options for different types of routes”*. The TA for this application has shown five active travel accesses between the application site and HBD site and goes on to say these are indicatively where they are shown on the HBD application. The extract from Figure 10 of the TA below shows a relatively high level of permeability, that at

Email: [REDACTED]

best could be described as incidental connectivity and is a long way from “a *connected network of green off-road routes encouraging greater walking and cycling*”. This is not a criticism of this application, but rather a consequence of how it has responded to the HBD layout, which shows a convoluted green corridor on their perimeter of their ownership, rather than a illustrative strategic link as shown in the SPD.



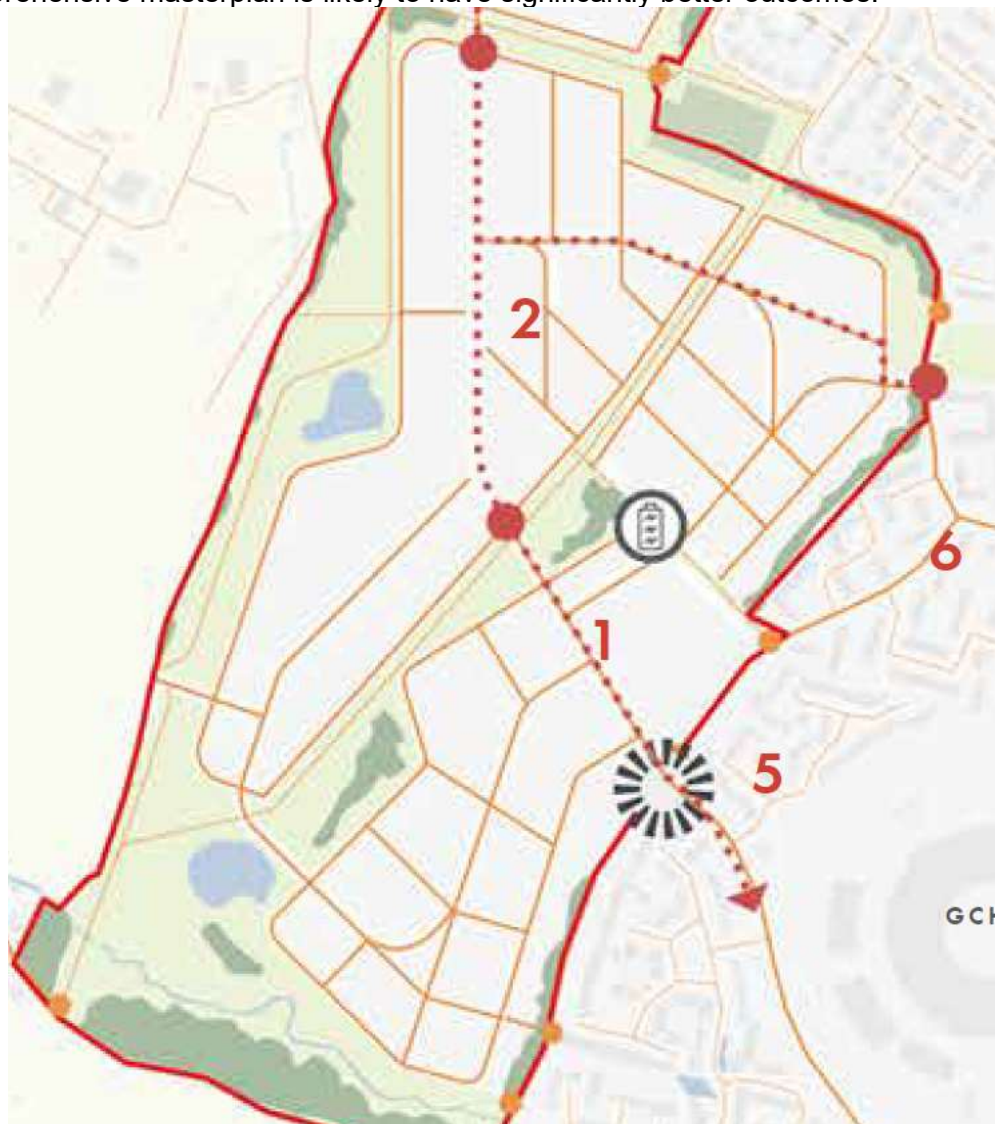
Policy SA1 of the JCS states that “*Proposals must be accompanied by a comprehensive masterplan for the entire Strategic Allocation. This should demonstrate how new development will integrate with and complement its surroundings in an appropriate manner, in accordance with Policy SD4. The JCS authorities will be flexible in considering different approaches to achieving a comprehensive masterplan providing that proposals still take fully into account the development and infrastructure needs of the wider allocation and demonstrate that it would not prejudice the sustainable delivery of the entire allocation*”.

The linkages between the sites are essential infrastructure and as set out in SA1 should be planned and provided comprehensively across the site taking into account

Email: [REDACTED]

the needs of the whole Strategic Allocation. There does not appear to be any cooperation concerning the form of these linkages, their frontage treatment and their purpose for onward movement.

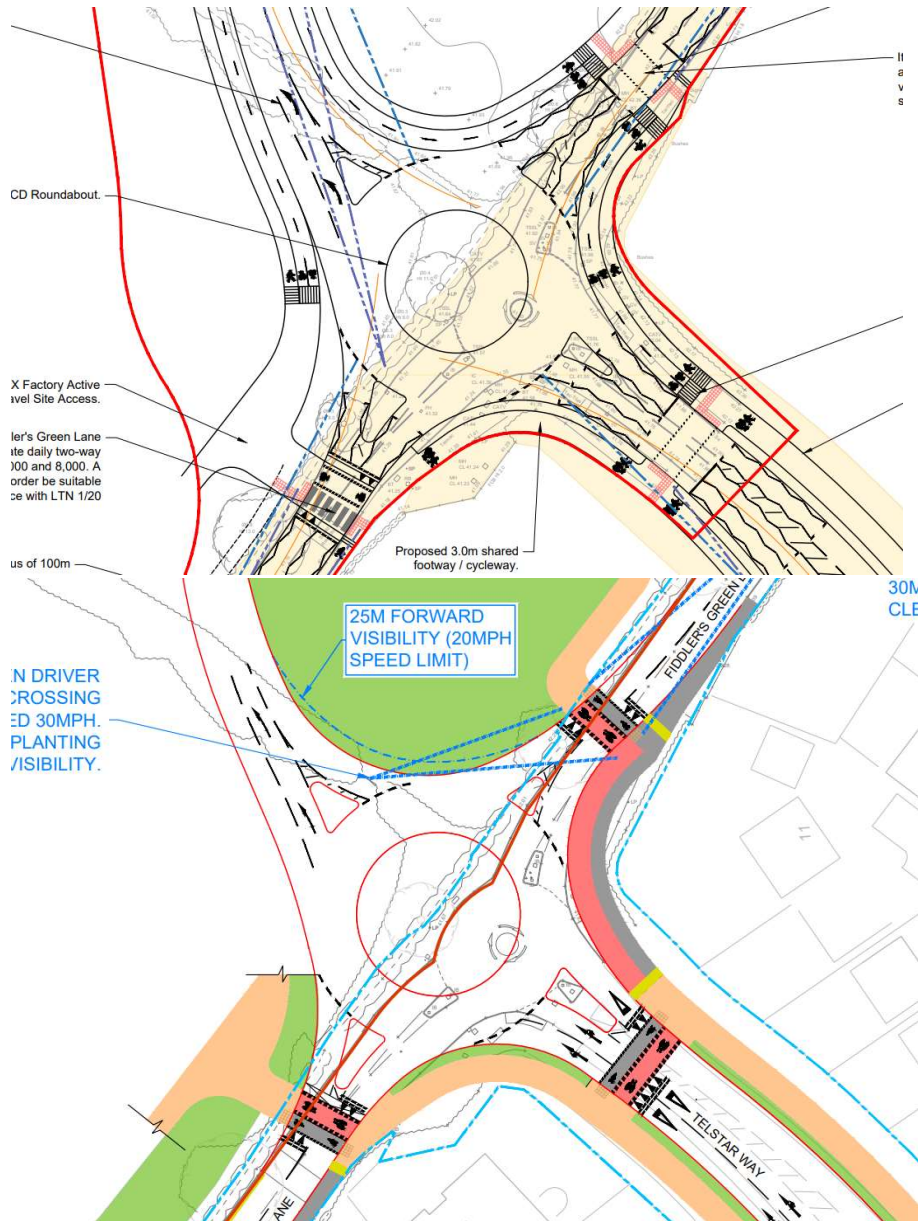
It is recommended that the JCS requirement for a comprehensive masterplan is followed. The SPD movement strategy was an illustrative framework and not a blueprint for development, however if the alternative road network that the HBD application proposes is consented, then that should be as part of comprehensive review of the linkages to this application site, so that still delivers the key objectives listed above. This would require cooperation on land boundaries. It should be noted that the SPD movements strategy illustrated a green corridor that does not respect land ownership boundaries as set out below. Adopting this approach through a comprehensive masterplan is likely to have significantly better outcomes.



This green corridor is broadly on the north/south alignment of the existing Springbank Way. This is partially replicated in the revised HBD revised masterplan. Although the SPD corridor not prescriptive, it is likely to have the best urban design outcome for the allocation as a whole. GCC are unable to recommend any meaningful planning conditions that help secure high-quality linkages without some form of joined-up plan.

Email: [REDACTED]

The above issue is not only present at the interface between the sites. At the site access the proposed Nema Option 2 roundabout which shows a 3m cycle track and 2m footway along their new access road to the proposed Telstar Way roundabout, with a potential onward link to the secondary access on Fiddlers Green Road. Whereas the HBD application shows no provision to walk or cycle alongside the site access road, (see image below), with their internal walking and cycling links being provided elsewhere.



External Active Travel

The Transport Assessment includes a Walking, Cycling and Horse Riding Assessment, (WCHAR). This looks at 4 routes:

- B4063 a Public Right of Way
- Arle Court Roundabout via Fiddler s Green Lane
- The A40 via Telstar Way
- Cheltenham Spa Station via Hesters Way Park.

Email: [REDACTED]

The WHCAR does not deal with external links to the north and north-east, in particular people travelling to and from the north on Springbank Way and Hesters Way Road (towards All Saints and Gallagher Retail) and through the Elm Farm Play area to Marsland Road and Coronation Square. It is noted that these other routes are included in the Appendix F of the TA showing the package of potential improvements identified by HBD. To resolve this the applicant could either amend the WCHAR to address these missing routes, or it might be easier to simply commit to a package of walking and cycling improvements that are necessary for their development in isolation, including these links to the north and north-east.

The only issue with this approach is that in the absence of the adjacent HBD site being implemented, this planning application would have to provide a walking and cycling route around the perimeter of the HBD site, along Fiddlers Green Lane linking to Springbank Way at Henley Road. Only part of this route is considered by the WCHAR, (Route 4).

Can the applicant provide supplemental information making clear the extent of their active travel commitments outside of the strategic allocation, so a recommendation can be made as to which elements should be secured with pooled funding with the HBD and St Modwen applications and which elements have to be delivered directly by the applicant. As a minimum, this should include routes to Arle Court, to the A40, to Marsland Road, Coronation Square and the Rail Station. Additionally, can the applicant review the route from the site access roundabout around the perimeter of the HBD site as far as Henley Road, in the unlikely event this application were to come forward in advance of HBD.

The Golden Valley SPD refers to a “*continuous and high quality off-carriageway link to Cheltenham Railway Station will be provided to the site from the southern access and via Telstar Way and the A40*”. The wider agreed package of works for the HBD site does not include the remaining missing link, which is along Gloucester Road, from the A40 to the Rail Station. The County Council are promoting an alternative link alongside the rail line from the A40 (opposite Shelburne Road) to the Rail Station. However, it is agreed that the more direct route to the Railway Station would use Shakespeare Road, Tennyson Road and Libertus Road. The County Council have prepared a design for an **on-road** cycle route in that area, however measures to traffic calm the road or discourage rat-running between Princess Elizabeth Way and Gloucester Road would make on-road cycling more attractive should also form part of the mitigation for the wider allocation. The County Council’s on-road scheme has been included in Appendix F of the TA.

The movement and access strategy (Appendix H of the TA) shows a number of active travel link to the land to the west of the site, however these are concentrated in the northern part of the site, with the exception of FP 6 to the south. Can the applicant consider a more evenly distributed pattern of active travel links to the west, or is there a good reason not to in this area?

Public Rights of Way

Para 4.19-4.20 of the Transport Assessment deals with public rights of way. Footpath 6 will need to be formally diverted prior to any development being implemented. It is assumed that the route will be subsumed onto one of the proposed internal paths. Any consent will need an informative setting out the requirement to legally divert this path.

Email: [REDACTED]

Road Safety

Para 3.15 of the Transport Assessment deals with road safety and the recorded injury accidents. It concludes that there are no existing highway safety patterns or concerns with the five-year study period in the vicinity of the application site. However, there are quite a high level of pedestrian and cycling accidents at specific locations. Can the applicant plot the pedestrian and cycling accidents only and determine whether these are at locations where there will be an intensification of use arising pedestrians and cyclist travelling to and from this site. There are a range of walking and cycling enhancements that have already been identified as part of the wider Golden Valley assessment as mentioned above, so it is likely that most areas of concern are being addressed.

Public Transport

Para 4.23 4.24 of the TA refers to the Fiddlers Green Bus Gate and HBD's proposals to divert Service A on that route. It is not clear whether this planning application is committing to bringing forward the Fiddlers Bus Gate works independently of HBD, if indeed they were to proceed in advance. Can this be clarified?

Para 5.52 – 5.64 deals with public transport in more detail and points out that the bus services will need to be implemented at the earliest opportunity in order to meet the overall transport strategy and overarching aims of the GV SPD. This planning application needs to make clear what phased stand-alone public transport mitigation it proposes in respect of pump-priming the diversion of existing services. If it assumed the HBD provision is in place beforehand then this should be made clear.

If the applicant proposes apportioning the costs of diverting Service A and C between themselves and the HBD site, could they please propose an apportionment methodology.

A vehicle access strategy that directly accesses this application site from the Telstar Way roundabout would on balance be more favourable overall, mainly because it would allow for better penetration of bus services. This is something that should be considered as part of a comprehensive masterplan.

The HBD northern access as shown on their indicative masterplan does not appear to make adequate provision for a bus route, if indeed this application were to route buses through the site via the central access from Telstar Way. This should be considered as part of a comprehensive masterplan.

Vehicle Access

The TA outlines two Roundabout Options for the main site junction with Telstar Way. A 50m diameter roundabout based on a higher level of potential combined development traffic and a smaller 36m diameter roundabout which assumes a lower level of traffic and the successful implementation of a Transport Strategy. The HBD application proposes a 36m diameter roundabout; currently the County Council are awaiting more information from HBD concerning their Framework Travel Plan and how their measures will achieve the anticipated lower level of traffic. The County Council consider that the smaller 36m diameter roundabout may be able to cope with the levels of traffic arising from the proposed vision for the sites, provided of course there are adequate measures to incentivise alternative means of travel and discourage car use. The same Travel Plan work needs to be undertaken for this application, establishing a

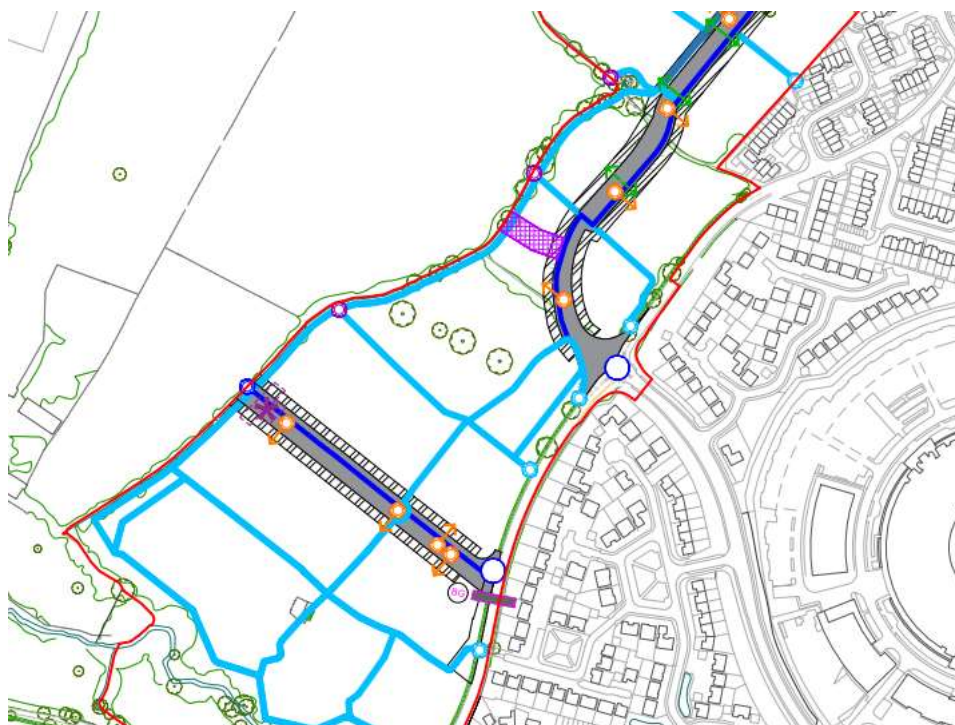
Email: [REDACTED]

clear link between the proposed sustainable transport intervention and the resulting anticipated change in travel behaviour. Therefore the County Council are currently unable to support either Option 1 or 2 until such time as the Travel Plan measures are finalised.

The proposed southern vehicle access onto Fiddlers Green Lane matches the alignment shown in HBD's proposal. Depending on the results of the Travel Plan discussions, it may be necessary to change the priority of traffic at the Fiddlers Green junction and the location of the bus gate, to distribute some of the site traffic to Arle Court roundabout rather than funnelling it all via Telstar Way.

The proposed southern vehicle access to Fiddlers Green significantly differs from the HBD proposals in terms of road width, footway, cycleway and verge provision, which appear completely different. This needs to be addressed through a comprehensive masterplan.

The proposed central vehicle access that links to the Testar Way roundabout does not appear to be compatible with the HBD layout. The adjacent HBD site has made a revised submission that includes a parameters plan for movement which does show a link to this application site as indicated below in purple. This is broadly in the correct location, however it still needs to resolve whether the active travel corridor will follow the road or be elsewhere as suggested by the light blue links below. This needs to be resolved through a comprehensive masterplan.



The proposed northern access to the HBD site significantly differs from the HBD proposals in terms of road width, footway, cycleway and verge provision, which are completely different. Indeed, the HBD indicative arrangement only shows a very minor access road in this location which is unlikely to be compatible with buses. This needs to be resolved through a comprehensive masterplan.

Email: [REDACTED]

Three access are not required for a site of this size and have only been shown indicatively. In terms of vehicle access considerations only, it would be preferable for a loop from the central access to the southern access. This would allow for resilience if the main access was obstructed in an emergency or for maintenance works.

It is not clear from the masterplan what provision is made for future potential vehicle access to land to west of this application site.

Highways mitigation

The M5 Junction 10 south slips enable the reallocation of a significant amount of strategic traffic travelling between M5 Junction 11, the A40, Princess Elizabeth Way, Old Gloucester Road, Gloucester Road and north Cheltenham via the new slip roads. The West Cheltenham and North West Cheltenham allocations are unable to mitigate their severe cumulative impacts on these links between the A40 and A4019 and are to some extent reliant on deliver of the M5 Junction 10 scheme. In the absence of the Junction 10 scheme, the County Council is recommending that a maximum total of development from the west Cheltenham and north west Cheltenham allocations cumulatively be restricted to 1711 residential units and 58,280 sqm of employment GFA.

The traffic modelling exercise apportioned this level of growth between west and north west Cheltenham in the manner set out below, however it should be noted that individual sites will be considered on a case-by-case basis, as different sites will have different impacts depending upon what order they are consented and implemented. That is a decision for the respective LPA's to make, however the County Council can help test different scenarios.

- West of Cheltenham: 481 dwellings, 34,845 sqm employment
- Elms Park: 1,230 dwellings, 23,435 sqm employment

You will note this is different from the National Highways limits on growth which are only in connection with the risk of queuing at the M5 Junction 10 south bound off-slip.

There is currently a funding gap for delivery of the M5 Junction 10 package of £81m. The County Council had developed a method of apportioning that funding gap amongst the dependent development sites. To comply with the policy tests for Section 106 contributions, the methodology excluded the 1711 units and employment land identified above that are not reliant on the scheme. The existing funding apportionment methodology uses the Saturn traffic model and a method called "select link analysis" to determine the level of dependent development traffic from the respective sites at the slips road of the M5 Junctions 10 and 11. This was considered to be the best proxy for the degree of benefit that arose from traffic switching from the existing heavily congested routes to and from Junction 11, to the new south facing slips at Junction 10. This was considered the best way to fairly and reasonably relate the contributions to the respective developments.

Following a meeting 18th of July 2024, it has been agreed with the site promoters' representatives that the County Council would investigate an alternative option to apportion the costs that might better meet the Section 106 tests. This will again be based on select link analysis, but this time at those locations where the County Council's more recent multi-modal traffic model shows would be severely congested with dependent development, but without the Junction 10 scheme. This work will also

Email: [REDACTED]

include a geographic “area of influence” to determine the area over which contributions will be levied more widely; this will establish the proportion of other growth which is not associated with west and north-west Cheltenham. This work is ongoing and is expected to report at the end of September 2024.

There is the potential need for this application site and the HBD site to implement some interim highways mitigation at local junctions, though it is the County Council’s preference that this disruption is avoided and investment is targeted at delivering the strategic solution at the M5 Junction 10. There is however the issue of the secondary access on Fiddler’s Green Lane and whether that directs traffic to the north or south. This will be dependent on the outcome of the final cumulative assessment and result of the Travel Plan measures, so that traffic can be managed at a level within the capacity of Telstar Way.

A significant amount of site traffic travelling to and from the north uses Princess Elizabeth Way via Fiddlers Green Road and Marsland Way to Coronation Square. This is unlikely to be significantly mitigated by the Junction 10 scheme and is likely to be a location where traffic calming will be considered in the future.

Traffic Modelling

The traffic modelling assessment report is included in Appendix X of the TA. Overall, the modelling assessment shows significant impacts on the level of congestion (queueing and delay) in the study area with the GV development in place. It provides a more detailed analysis on the modelling outputs as below.

- a) Network Wide Statistics (Network Wide Delay (seconds), Network Wide Speeds (kph) and completed Trips (Vehicles); and
- b) High Level Analysis (Hourly Queueing, Detailed Queue Analysis and Hourly Journey Times)

In terms of the network wide statistics, the modelling outputs were compared between various tested scenarios for the AM Peak periods (0700-1000) and PM Peak periods (1600-1900).

Can the applicant amend this with the model output analysis & comparison for AM Peak hour and PM peak hour in addition to Peak periods. The completed trips (vehicles) have been reported for each scenario.

Can the applicant also include the unreleased trips (vehicles) that are unable to enter the modelled network due to the congestion.

In terms of the hourly queueing analysis, it is not clear that the analysis is based on the average hourly queue or the hourly maximum queue. The hourly maximum queueing analysis is expected. In addition, the queue comparison criteria defined the ‘moderate development impact’ as increases in queue length of between 10 and 25 vehicles, ‘significant impact’ as increases in queue length of between 25 and 50 vehicles, and ‘very significant impact’ as increases in queue length above 50 vehicles. The following criteria more appropriate in an urban area when assessing queues. Can the analysis be amended to accord with these parameters.

- Moderate Increase (an increase in queue lengths of between 10 and 15 vehicles)

Email: [REDACTED]

- Significant Increase (an increase in queue lengths of between 15 and 25 vehicles)
- Very Significant Increase (an increase in queue length of over 25 vehicles)

Framework Travel Plan and Parking.

The County Council are currently working with the adjacent HBD applicant to arrive at some realistic Travel Plan interventions that could achieve the level of traffic reduction necessary. This will include parking restrictions to control displaced on-street parking and the measures to manage the mobility hubs alongside more basic issues like the proposed parking standards. It would be preferable to agree a joined-up approach to these issues between the two sites. Can the applicant confirm they would support joint approach to the Framework Travel and Parking strategy.

The Highway Authority therefore submits a response of deferral until the required information has been provided and considered.

Yours Sincerely

Simon Shapland
Highways Development Management Manager

Email: 

AtkinsRéalis

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GL1 2TH

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