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OUR REFERENCE:
M5J10.JC.D10.CL

YOUR REFERENCE:
TR010063

Date: 28 November 2024

Dear Mr Maund,

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

Submission made by the Joint Councils pursuant to Deadline 10 (D10) of the Examination of the M5 Junction 10 Improvements Scheme

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

This letter provides a summary of the Joint Councils' D10 submissions of which further details can be found within the following documents:

- Joint Councils' Written Submission of case put orally at the Hearings on 20 November 2024 – our document reference M5J10.JC.D10HS; prepared by AtkinsRéalis on behalf of the Joint Councils, dated 28 November 2024; and
- Joint Councils' Closing Submission – our document reference M5J10.JC.D10.CS; prepared by AtkinsRéalis on behalf of the Joint Councils, dated 28 November 2024.

The Joint Councils have also reviewed the submissions made by the Applicant and other Interested Parties at Deadline 9 (D9). Where a review of a submission item does not warrant a separate document, these are captured within this letter.

Joint Councils Written Submission of case put orally at the Hearings on 20 November 2024

The Joint Councils' written summary of the oral submissions made during Open Floor Hearing 2 (OFH2), Compulsory Acquisition Hearing 2 (CAH2) and Issue Specific Hearing 5 (ISH5) have been

set out in the titled submissions (our reference: M5J10.JC.D10HS) submitted at D10. This submission also comprises a summary of the Joint Councils' response to the following Action Point item:

Action Point item	Action By	Joint Councils' position at D10
ISH5 Action Point 8 – Confirmation of the list of specific properties to be provided to the Applicant and reasons why they are considered to be non-designated heritage assets?	Joint Councils	Please refer to Section 4.5 of the titled submission for a summary of the Joint Councils' response. For full details, please refer to the Joint Councils' submission at D9A [REP9A-008].

Joint Councils Follow-up Response to Issue Specific Hearing 4 [ISH4] Action Point 20

Following on from the Joint Councils' submissions at Deadline 7 (D7) and D9, the Joint Councils wish to submit the following updated response to Action Point item 20 arising from ISH4.

Action Point item	Action By	Joint Councils' position at D10
ISH4 Action Point 20 – JC to submit CIL Funding Policy agreed once relevant Joint Committee meeting has taken place 12 November 2024.	Joint Councils	The first CIL Joint Committee meeting was held on 12 November 2024. The Joint Councils will submit a copy of the meeting minutes once this is made available by the Democratic Services teams of the SLP authorities.

Joint Councils' comments on the D9 submissions made by the Applicant and other Interested Parties

The Joint Councils have reviewed the submissions made by the Applicant and other Interested Parties at D9 on 19 November 2024. In summary, the Joint Councils have no specific comments on the submissions made by other Interested Parties but would particularly like to highlight our comments on the following submission items made by the Applicant which are set out below.

Applicant Comments on Interested Parties D7 Submissions [REP9-008]

The Joint Councils have reviewed [REP9-008]. The Joint Councils noted that the Applicant has set out in Section 3 their responses to the following submission items made by the Joint Councils at D7:

- Cover Letter [REP7-017], which comprises the Joint Councils' comments on the Deadline 5 (D5) submissions made by the Applicant and other Interested Parties; and
- Joint Councils' written summary of the oral submissions made during Issue Specific Hearing 4 (ISH4) [REP7-018].

The Joint Councils broadly agree with the responses made by the Applicant in [REP9-008] and have no further comments to submit to Examination.

Applicant Response to Examining Authority's Third Written Questions (ExQ3) [REP9-011]

The Joint Councils have reviewed [REP9-011] and all other submission items from the Applicant that support their Response. The Joint Councils are broadly satisfied with the responses made by the Applicant. The Joint Councils only wish to provide the following remarks on the Applicant's response to question 9.0.1 regarding Non-Designated Heritage Assets:

"The Applicant has been provided with the criteria on which these additional 5 properties have been considered to be Non-Designated Heritage Assets. This information was provided to the Applicant on 21 November 2024. The Joint Councils have recorded this in our Deadline 9A submission [REP9A-008]."

Environmental Statement Chapter 11: Cultural Heritage [REP9-002]

The Joint Councils have invited the County Archaeologist to review [REP9-002]. The County Archaeologist is broadly satisfied with the updates made by the Applicant to [REP9-002]. There are only three minor comments from the County Archaeologist which the Applicant is suggested to address. These have been forwarded to the Applicant for consideration.

Environmental Management Plan Annex B17 – River Realignment and Channel Diversion Management Plan [REP9-006]

The Joint Councils have reviewed [REP9-006]. The Joint Councils' flood risk specialist would like to raise the following comment on the Management Plan:

"It is not clear whether any crossings of the temporary diversion channel are anticipated to be required to facilitate construction access. Can this be clarified please? If there is a need for temporary crossings then they need to be designed to meet hydromorphological, hydroecological and hydraulic capacity criteria."

The Joint Councils' geomorphological specialists have provided five comments which we are suggesting are addressed in the next iteration of the Management Plan. These have been forwarded to the Applicant for consideration. The Joint Councils will continue to engage with the Applicant in the detailed design stage of the Scheme as consultees under the provisions within the DCO.

Environmental Statement Appendix 11.5: Archaeological Geophysical Survey of Land around J10 of M5 – September-October 2024 First Interim Report [REP9-007]

The Joint Councils have received [REP9-007] from the Applicant prior to their submission at D9 and have invited the County Archaeologist to review. The County Archaeologist only raised a minor typographical comment and this has been passed to the Applicant to address. The County Archaeologist also requested the Applicant to provide an update on the progress with the remaining areas, which should be due by November 2024, and their reporting.

Other Submissions made by the Applicant at D9

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

Joint Councils' comments on the Deadline 9A (D9A) submissions made by the Applicant and other Interested Parties

The Joint Councils are aware of the submissions made by the Applicant and Mr Hadley at D9A on 26 November 2024. The Joint Councils are still in the process of reviewing these submissions and are not in a position to provide comments at D10. If the Joint Councils find it necessary to raise any comments following our review, these will be passed directly to the Applicant and Mr Hadley.

Updates on Environmental Management Plans Annex B8 – Archaeological Management Plan (AMP)

The Joint Councils are aware that the Applicant intends to submit a revised first iteration of the AMP at D10. The Joint Councils have received a draft AMP from the Applicant prior to their submission at D10 and have invited the County Archaeologist to review. A meeting was held between the Joint Councils and the Applicant on 25 November 2024 to go through the County Archaeologist's comments. All comments have been addressed and the County Archaeologist is broadly satisfied with the revised first iteration of the AMP. The County Archaeologist will continue to engage with the Applicant in the detailed design stage of the Scheme as a consultee.

The Joint Councils reiterate their support for the purpose of the Order and concur with the Applicant that works enabled by the Order will assist to unlock the development of additional housing in the Strategic Site Allocations and Safeguarded Land. The final SoCG sets out the Joint Councils' position on the Scheme upon the close of Examination. A summary of the Joint Councils' position is also provided in our Closing Submission at D10.

The Joint Councils would also like to thank the ExA and the Planning Inspectorate's Case Team for their time on this DCO Scheme. If further information is required, please do not hesitate to be in contact via the M5 J10 Joint Councils project team: M5J10JointCouncils@atkinsrealis.com.

Yours sincerely,



Lewis Oliver

Associate Planner for and on behalf of The Joint Councils